

Homelessness NSW Submission to the NSW Independent Floods Inquiry



Homelessness NSW (HNSW) is a not-for-profit organisation that operates as a peak agency for its member organisations to end homelessness across NSW. Our members include small, locally based community organisations, multiservice agencies with a regional reach and large state-wide service providers.

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Key Recommendations

Homelessness NSW recommends that the NSW Government enact the following key recommendations.

Recommendation 1 Invest 2.6 billion per year for the next 10 years to grow social housing by 5,000 properties per year, including acquiring existing stock to fast-track housing of priority cohorts.

Recommendation 2 Commit an additional \$500 million to repair existing social housing stock.

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Recommendation 4 Fund an evidence based and data-informed comprehensive assessment of the Specialist Homelessness Service Program to determine investment increase as proportionate to need and cohort.

Recommendation 5 Increase Specialist Homelessness Service Program funding by 20% or approximately \$156 million over 3 years so that services can meet current demand.

Recommendation 6 Implement previous recommendations by Homelessness NSW in consultation with services following climate changed induced disasters in 2017 flooding, 2020-21 bushfires, and 2021 flooding incidents.

Recommendation 7: Implement future climate/public disaster management plans with the assistance of local services, and clear decisions on roles from each organisation, including a clear centralised list of people with higher needs in regions.

Recommendation 8: Implement trauma informed approaches to disaster management for people experiencing homelessness including accounting for surge in mental health assistance, people with additional needs, and the needs of people previously experiencing homelessness.

Recommendation 9: Direct community consultation in flood-affected communities with Specialist Homelessness Services and people with lived experience of homelessness, alongside other relevant services.

Recommendation 10: Enact a regional homelessness strategy in consultation with local Specialist Homelessness Services, with measurable outcomes to address the rising number of people experiencing homelessness. This should include:

- Trauma-informed, accessible Emergency Accommodation
- Exits into longer-term housing options

Recommendation 11: Adequately fund and support local Specialist Homelessness Services in flood-affected communities, (as opposed to only consulting with larger

charities) including financial compensation for additional work during the flooding incidents, and packages for staff to prioritise sustainability of local services.

Recommendation 12: Implement guarantees to protect and build housing stock for people at risk of homelessness including:

- Replacement of lost housing stock and additional housing stock to meet the needs of people experiencing homelessness
- Prevention of rent gouging and increasing insurance costs for Specialist Homelessness Services and Community Housing Providers

Introduction

Homelessness NSW welcomes the opportunity to provide a response to the NSW Independent Floods Inquiry.

The recent flooding events were a catastrophic event impacting entire regions of Northern NSW and South-Western Sydney. In consultations with Specialist Homelessness Services and other local services in the Northern NSW region, Homelessness NSW has heard the NSW Government failed to adequately plan and act in the event of an emergency. For example, SHSs working with people with high levels of disability or mental health needs reported that there was simply no communication for extended periods of time from emergency services prior to or during the flooding events - let alone delivery of the support needs to ensure the safety of the people they work with.

Prior to the failures of the emergency response system during the recent flooding events, the homelessness service system in NSW was already in crisis.

This is a critical part of determining how well NSW was and is placed to not only prevent and mitigate emergencies and disasters, but how well we were and are placed to respond.

It is important to note that the NSW flooding, and those it left homeless, occurred in the context of an ongoing crisis of homelessness in NSW:

- Between 2011 and 2016 the number of people experiencing homelessness in NSW increased by 37% from 27,479 to 37,715.
- Homelessness services have also experienced unprecedented demand with a 38% increase in clients from 2014 – 2016.
- This level of demand has been maintained since 2016. In 2018-19 homeless services across NSW saw over 73,000 clients. This is 27% more than they are funded to work with.
- NSW has now reached the point where more people who need crisis accommodation do not receive it (21,552) than those who do (18,000).
- And even if supported by a homelessness service, 2 in 3 clients will still be without long term accommodation or housing.¹

Our ability to respond to increased pressure on 'crisis' accommodation is severely hampered when the 'crisis' system itself constantly in crisis. If we don't start to build relief for the everyday person into our housing system – into affordable renting, social housing, housing security - there is very little resilience and flexibility in times of emergency and disaster.

¹ Homelessness NSW, 2016, 'Homelessness in NSW', <http://homelessnessnsw.org.au/wp-content/uploads/2021/03/Homelessness-in-New-South-Wales-.pdf>

Homelessness NSW welcomes further consultations to provide evidence.

Before recent flooding events

Absence of disaster planning lessons following recent climate induced disasters

Homelessness NSW advocated alongside other peak bodies and services for planning and preparedness to respond to climate change induced disasters following the the 2017 floods in the Northern Rivers region, the 2019-2020 bushfire events and 2021 floods in the Mid North Coast and Nepean-Hawkesbury areas.

Unfortunately, the recent flooding events do not indicate that feedback on the experience of recent disasters were considered or implemented in preparation for further climate change induced events in NSW. Further detail of the Homelessness NSW advocacy to call for this preparation is evidenced in our statement to NSW Government following the 2021 floods in the Mid North Coast.²

The Homelessness NSW statement called for:

...the development of emergency response planning that includes homelessness services and for the NSW Government to invest in:

- Resources to assist homelessness services to prepare and plan for extreme weather events and inclusion of homelessness services in emergency management prevention and preparation planning, with a focus on client safety and additional support requirements.
- Resources to support homelessness services in managing the influx of clients and increase in workload during an emergency and in the recovery period, including how staff might be redeployed from other areas to support the response to enable existing staff to support their own personal evacuation or property management response.
- Resources provided to Councils in areas with rough sleeper communities to plan for and lead a response to support people sleeping rough during hazardous periods to ensure that they remain healthy and safe.
- Resources to ensure that all low-cost housing, including social housing, can ensure a smoke free and healthy environment to protect the health of tenants.
- Aboriginal community led planning and resources to ensure that Aboriginal people are not displaced from their homes and community and are able to access affordable and appropriate housing.
- Resources to provide affordable housing for the most vulnerable members of the community during the recovery period

Examples in our statement on the experience in the 2021 floods included:

Hawkesbury

Homeless 'sites' on the Hawkesbury River and Caravan and Ski Parks being flooded with no initial plan in place to support people. Homelessness services and the Department of Communities and Justices worked collaboratively to support people by

² Homelessness NSW, 2021, 'Floods and Homelessness', <https://homelessnessnsw.org.au/wp-content/uploads/2021/04/Floods-Statement-April-2021.pdf>

going across in boats and ferrying them back across the river to where there are services, looking for accommodation options and providing ongoing support – but it was a rapid scramble to find accommodation, food and other supports with no pre-existing plan in place for this – and there will be limited long term options because there is no available social housing and no services in the area.

Mid North Coast

In the Mid North coast, it would be great see something specific about flexible and responsive access to Temporary Accommodation during severe weather events. We still faced the red tape of people not being eligible for TA due to breaches. Homelessness services paid for those people we connected with to access safe and dry accommodation. A localised Plan that was led by DCJ or Council and aimed at assisting those who are sleeping rough would be welcomed. The plan would be in place and communicated prior to a crisis. Homelessness drop-in services became the default evacuation centre for people sleeping rough. Pete's place was a natural point for people to go during the weather event in Coffs over the weekend. Port and Kempsey did have evacuation centres but people sleeping rough don't present to these locations. People sleeping rough are also unlikely to call Link2 Home. This is why there is a specific plan needed for those sleeping rough.

Since the recent 2022 flooding incidents, a Northern Rivers Specialist Homelessness Service reflected that previously available funding for training volunteers had been withdrawn from services since the 2017 floods, despite volunteers in the local area being critical to disaster responses. For example, they were previously involved in different workshops with Lismore City Council, SES, the Red Cross, and Rural Fire Services. A report into volunteering was produced to support this, but none of this was followed up, and no one funded to train and recruit volunteers in the region.

One service manager that responded to the 2020 fires in the Shoalhaven noted how similar their experience of emergency response to the bushfire disaster was to what Northern Rivers region is currently experiencing. In Shoalhaven area, meetings were held following the bushfires to reflect on the lack of response plans and how NGOs could be included. However, they commented that these lessons have not been implemented in the recent 2022 flooding incidents.

Housing and homelessness system in crisis

Prior to the 2022 flooding events, the housing and homelessness system was already in crisis, particularly in the Northern Rivers region where there is close to zero housing supply, skyrocketing rentals costs, and severely underfunded Specialist Homelessness Services.

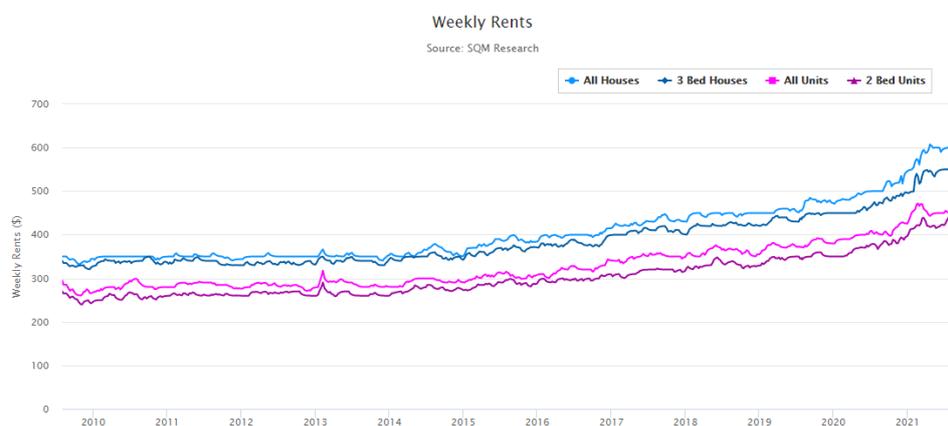
Unaffordability of the rental market

Figure 1 indicates that weekly rents in the North Coast of NSW have increased from \$350 for all houses in August 2009, to \$612 in August 2021.

Figure 1

WEEKLY RENTS

REGION: NORTH COAST NSW



SQM Research Weekly Rents Index									
Week ending		Change	Rolling	Rolling	3 year	7 year	10 year		
4 Aug 2021		on	month	quarter	%(pa)	%(pa)	%(pa)		
		prev week	% change	% change	% change	change	change	change	
North Coast NSW	All Houses	612.3	12.7 ▲	2.5% ▲	1.4% ▲	22.5% ▲	10.8% ▲	7.3% ▲	5.8% ▲
	3 br Houses	560.0	10.0 ▲	1.9% ▲	3.0% ▲	19.8% ▲	9.5% ▲	6.6% ▲	5.1% ▲
	All Units	455.6	4.4 ▲	1.3% ▲	2.0% ▲	12.2% ▲	7.5% ▲	6.2% ▲	4.6% ▲
	2 br Units	444.5	5.5 ▲	5.4% ▲	6.1% ▲	18.8% ▲	9.7% ▲	6.7% ▲	5.5% ▲

Source: SQM Research, 'Weekly rents region: North Coast NSW, no date, <https://sqmresearch.com.au/weekly-rents.php?sfx=®ion=nsw%3A%3ANorth+Coast+NSW&t=1>

Rental prices on the North Coast have climbed over 22 per cent in the past 12 months, surpassing those in all of Australia's capital cities.

Figures from CoreLogic show the median rent for houses in the Richmond/Tweed region is now \$699 per week. In comparison, Sydney houses are \$646pw, and the national median for house rentals is just under \$500pw.³

Data from the Department of Communities and Justice shows the median rent for the Port Macquarie-Hastings area increased about 15 per cent in the 12 months to March 2021, from \$395 to \$450.

A real estate agency reported that the number of available properties in Port Macquarie decreased drastically in the last 18 months. Roughly 350 rental properties were available before the pandemic, Ms Higgins said. Statistically October last year was the worst time. "We had a low of 41 properties available across Port Macquarie in total, across all the real estate agents. "One of my worst [the most in-demand] ones had about 120 people enquire on the one property."⁴

The head of Northern Rivers advocacy group and homelessness organisation Social Futures, Tony Davies, told the ABC that skyrocketing rents were damaging the "social fabric" of the region by pricing out long-term locals and modestly paid workers in industries like retail, hospitality, social services, and the creative arts. "It will absolutely disrupt the fabric of our community if we lose all of these vital parts of our community," he said. "That's why we have hundreds of women now sleeping in cars to keep their children in schools."⁵

Declining funding for social housing

When rental properties are unaffordable for those on lower, or even middle incomes, the only long-term housing solution for an increasing number of people is social housing.

However, according to the Centre for Social Impact, the total spending on social housing in NSW in 2019-20 was at its lowest in five years, down from \$1.71 billion in 2018-19 and further down from \$1.92 billion in 2017-2018.⁶

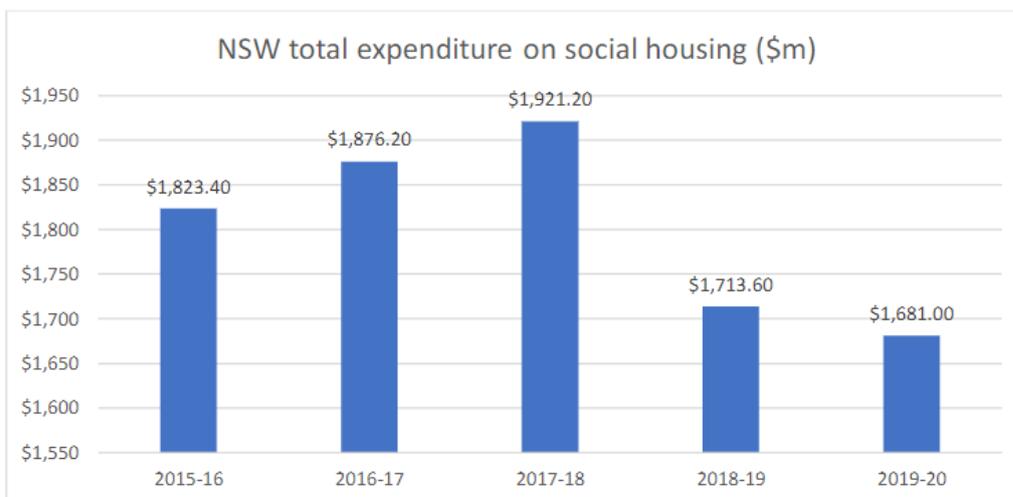
³ White, Leah, 'NSW North Coast rent prices "off the charts" as they surpass capital cities', ABC News, 20 July 2021, <https://www.abc.net.au/news/2021-07-20/north-coast-rent-prices-off-the-charts/100303728>

⁴ 22 Sati, Wiriya, 'Paying \$500 rent for a "glorified tent" as regional NSW housing shortage prices people out', ABC News, 8 July 2021, [Paying \\$500 rent for 'a glorified tent' as regional NSW housing shortage prices people out - ABC News](#)

⁵ Ibid.

⁶ Barnes, Emma, Writer, Thomas., Hartley, Chris, 2021, 'Social Housing in New South Wales: Report 1 Contemporary analysis', Centre for Social Impact, p.22 www.csi.edu.au/media/uploads/social_housing_in_nsw_contemporary_analysis.pdf

Figure 2



Source: Productivity Commission, 2021, in Centre for Social Impact, 2021⁷ in Barnes, Emma, Writer, Thomas Hartley, Chris, 2021, 'Social Housing in New South Wales: Report 1 Contemporary analysis', Centre for Social Impact, https://www.csi.edu.au/media/uploads/social_housing_in_nsw_contemporary_analysis.pdf, p. 23

The total expenditure on social housing per person in 2019-20 was the lowest in five years at \$205.84, down from \$211.14 in 2018-19 and from a high of \$239.74 in 2017-18.⁷

As the rental market has become increasingly unaffordable, social housing investment has dramatically decreased, creating a perfect storm for increasing homelessness. This is reflected in the waitlist time for social housing.

For many regional areas in NSW, wait times tend to be five years to ten years, and in some instances, are more than ten years.⁸

The waitlist times for social housing on the DCJ for social housing in the North Coast are below⁹:

- Lismore: 5-10 years
- Tweed Heads 10+ years
- Ballina 5-10 years for studio or 4+ bedroom, 10+ years for other properties

Severe underfunding of Specialist Homelessness Services

On 3 March 2021 Homelessness NSW held an online forum with over 50 Specialist Homelessness Services from across the state to discuss the current housing situation in regional and rural areas, the impact of the pandemic and to workshop

⁷ Ibid, p.23

⁸ NSW DCJ, 2020, in *ibid.* p.20

⁹ NSW DCJ, 'Guide to waiting times for social housing at 30 June 2020', <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>

possible solutions. It was clear that the housing/homelessness situation was worsening quickly, largely driven by impacts of the pandemic, and cuts to JobKeeper and JobSeeker.

There were stories of non-existent rental vacancy rates, rental auctions, increased numbers of people fronting homelessness services, and services losing valued staff who are exhausted from the 12 months of the pandemic.

This is evidenced by statistics on the further overservicing of Specialist Homelessness Services in NSW prior to and since the COVID-19 pandemic.

Of all organisations surveyed providing medium- and long-term housing in NSW, 48 per cent have reported an increase in the number of clients since the COVID-19 pandemic, while 12 per cent have reported a decline.¹⁰

A recent Productivity Commission report found that in NSW unmet demand for homelessness services had been increasing alarmingly prior to the pandemic, jumping 4.7 percentage points to 41.9% in 2017-2018 and 45.2% the following year.¹¹

This is despite the number of people seeking accommodation assistance from homelessness services in NSW remaining steady – hovering between 46,072 and 47,652 people a year over the past five years – and that state's investment in homelessness services also remaining flat at an average of \$34.96 a person, per support day.¹²

Specialist Homelessness Services were experiencing high demand during the COVID-19 pandemic, following years of underfunding, and therefore the ability to respond to any disaster such as the recent flooding incident was severely hampered.

¹⁰ Equity Economics, 2020, 'A Wave of Disadvantage across NSW: Impact of the COVID-19 recession', <https://homelessnessnsw.org.au/wp-content/uploads/2021/03/Oct-2020-Equity-Economics-Wave-of-Disadvantage-COVID-19.pdf> p.16

¹¹ Convery, Stephanie, 2022, 'Almost half of people seeking homelessness support did not get it, report finds', <https://www.theguardian.com/australia-news/2022/jan/25/almost-half-of-people-seeking-help-for-homelessness-in-nsw-in-past-year-did-not-get-it-report-finds>

¹² Ibid.

Chapter recommendations

Recommendation 1 Invest 2.6 billion per year for the next 10 years to grow social housing by 5,000 properties per year, including acquiring existing stock to fast-track housing of priority cohorts.

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Recommendation 6 Implement previous recommendations by Homelessness NSW in consultation with services following climate changed induced disasters in 2017 flooding, 2020-21 bushfires, and 2021 flooding incidents.

During the flooding incident

Absenteeism from Government and SES emergency response

Specialist Homelessness Services in Northern NSW reported that there was almost wholesale absence of responsibility by the Government and SES for responding to the flooding incidents and the safety of people experiencing homelessness.

Over eight weeks since the first flooding in Northern NSW, local services are still waiting for communication and assistance from government and SES.

Lack of communication

In the Northern NSW region people at risk of homelessness, people with higher support needs, and services were not adequately communicated to or warned of developing floods. Services reported that they were only able to learn of developments through local ABC Radio.

Services reported that communication was very poor in Lismore during the first round of flooding and in the second round of flooding in Ballina there was no communication given to services at all. At one point, there was no ability to communicate on the North Coast for six days.

The issues in communication include the examples from services below:

- Getting phone calls at 4am from physically impaired clients on balconies where water was up to their chest and wondering whether they were going to be saved or must break through their roofs - they got no response to SES line or were rarely able to get through.
- Service reporting vulnerable people had not been communicated with about the flooding. For example, one 94-year-old man went to sleep without his hearing aids on and woke up to flooding. He only survived by wading to the front door and by chance SES were on his street.
- Confusion over location of evacuation centres occurred, including changing locations of centres in the middle of the night because they had begun flooding. People also often couldn't get into Emergency Accommodation due to flooding on roads. There could have been better planning to ascertain setting up on higher grounds. People had to rely on having friends and family to couch surf or stay in their cars.

A service manager commented on the experience of working on the bushfire response in South Australia and cyclone response in North Queensland. The state government provided funding to local council areas to work with everyone and put plans in place. This worked very well with local stand-up committees and clarity of roles.

Confusion of roles

Services reported a confusion of roles and responsibilities throughout the flooding incident.

This included the experiences below:

- Services were not communicated to about what role they wanted to play in disaster management. Government, SES, and local services could have worked together to plan out different roles to safely act and benefit from local knowledge.
- A service said there were previously lists of vulnerable people and frameworks for responding in the Clarence Valley but there was no involvement with local services to organise this – and services said if this had occurred deaths could have been avoided.
- Whilst SES should have played the role of rescue, they told services that the situation was too dangerous for them to rescue people including clients, but this left rescue to ordinary untrained citizens who were probably in higher levels of danger.
- Services reported they would have lost 6-8 people if it was not for the efforts of the community.

Minimal resourcing for local Specialist Homelessness Services and people experiencing homelessness

Services reported that despite the lack of planning and resources from Government, they have undertaken extensive roles in flood response and recovery, with some services playing this role without financial compensation.

No trauma informed response to temporary housing and support

- Services are reporting that the primary need is for mental health support through counselling for those effected by floods. Specialist Homelessness Services are reporting that they are providing counselling support for flood survivors using their own brokerage and are unable to meet the overwhelming demand for counselling services. There is inadequate funding for mental health support and not enough money for NGOs who are already delivering these services.
- Evacuation centres were often inappropriate for people's needs. For example, people could not access medication and supplies that you would usually have ready for disasters, so services had to work out how to get that to people. In Lismore, there were only two supermarkets not flood affected, so it was difficult to get normal day to day supplies. Services said SES and Government should have been setting up resources and flood free emergency evacuation centres that could simply be opened when needed.

Emergency Accommodation was not suitable for many people. Examples included:

- Resilience NSW often housed people in inappropriate accommodation. For example, they put one client in a cabin in South Ballina, but because of flooding ferries could not travel across to the accommodation, and with no car it meant it cost \$200 to get to get taxis to the supermarket. Another example is that they placed families into motels with no cooking facilities.
- An example was given of a client with serious mental health needs being transferred away from existing support services to accommodation in areas with much less mental health support and to multiple locations from Lismore to Grafton, Woolgoolga.

Barriers to support for local services

Government Departments tended to consult with and fund larger charities at a national level, but this did not work during the flooding incident, particularly due the importance of local knowledge for the flood response.

Examples include:

- Employees flown in from larger charities left during the COVID-19 crisis due to the impacts of crises.
- Larger charities flown in to assist the response set up donation vans in areas which flood, but local services were already offering support through a warehouse they had set up ready for floods without being resourced to do so from the first day of flooding.
- Governments financed larger charities but did not resource local community services. For example, one large charity financed for flood recovery support only had crisis support for half an hour weekly, but a small-medium Specialist Homelessness Service unfunded for flood support was “one of the only services still delivering flood relief services, staff doing food, clothes, drops, doing deliveries from day one.”
- Specialist Homelessness services were directed to support people in makeshift camps without consideration of lack of resources or the need to request staff from other areas outside of their normal day jobs. One service did this for three weeks and provided supplies people needed. There was also little to no correspondence between Resilience NSW and camp providers such as caravan parks – a service said that every time they referred someone to Resilience NSW, they would just be referred back to us. This create a dangerous situation where staff were placed at risk due to unsafe working conditions with people experiencing homelessness without clear answers - one camp was almost shut down due to this.
- One service said their staff has had to meet clients in parks, cars, bowling clubs, because there was nowhere for impacted services to set up.

Chapter Recommendations

Recommendation 7: Implement future climate/public disaster management plans with the assistance of local services, and clear decisions on roles from each organisation, including a clear centralised list of people with higher needs in regions.

Recommendation 8: Implement trauma informed approaches to disaster management for people experiencing homelessness including accounting for surge in mental health assistance, people with additional needs, and the needs of people previously experiencing homelessness.

Recommendation 9: Direct community consultation in flood-affected communities with Specialist Homelessness Services and people with lived experience of homelessness, alongside other relevant services.

Ongoing and future issues for the homelessness sector and people experiencing homelessness

Communication and coordination of a recovery strategy

Services in the Northern Rivers region are still waiting for communication from the Government on major uncertainties such as the impact of flooding on the sustainability of their services and support for the people that they work with experiencing homelessness.

Issues with temporary accommodation/ suitability of Emergency Accommodation

There has been a steep increase in people experiencing homelessness, including people rough sleeping, and unsuitability or unavailability of Temporary and Emergency Accommodation. This includes:

- A significant increase in the number of people sleeping in vans - approximately 250 counted by Byron City Council at the end of March 2022, 363 counted observations of primary homelessness by End Street Sleeping coalition at beginning of June 2022.
- There is an obvious lack of services/facilities for people rough sleeping. For example, increasing numbers of people accessing existing services such as toilet or showers at Fletcher St/Orange Sky or public facilities means the facilities are unable to meet demand. This is something that will continue, or increase given the existing housing crisis compounded by floods and people relocating from surrounding LGAs.
- Ongoing issues with accessing temporary accommodation in the Byron shire is far worse than pre-flooding. The current situation means people are inappropriately being asked to relocate significant distances and in some cases interstate. The flooding incident was proof that hotels/cabins/caravan parks could be accessed when needed (outside of holiday period) yet very little of this accommodation was offered to rough sleepers or existing homeless people.
- Emergency Accommodation in Wollongbar is not accessible for many people without access to a car or who have lost their car during the floods. There is a little IGA but no real shopping and one small public primary school and no high school, so it is not a medium or longer-term solution.
- One service said they had been announced as managing temporary villages but that there has been no coordinated communication of this with the sector.
- A service raised that they had to advocate to change original plans for emergency housing from inhumane empty boxes without facilities which lacked a human response to assist traumatised individuals.

Challenges of housing stock

- Areas of Northern NSW previously used as rental properties have been flooded and therefore entire areas of rental properties have now been depleted.
- Specialist Homelessness Services with housing are concerned about their ability to replace damaged properties or existing properties due to the rising cost of insurance.
- Rent gouging has occurred since the flooding incident, with an example given of \$700 per night for a three-bedroom house in Byron Bay, and rental prices in Grafton have increased significantly. A service gave an example of mandated pegged increases in San Francisco so that rental gouging is prevented.

Challenges for Specialist Homelessness Services:

- Services are underfunded and understaffed and managers are concerned by ongoing vicarious trauma for staff living in the region and working in this area, particularly for staff now homeless.
- One service reflected that 70 staff had been affected by the recent flooding.
- Services have had to pay large sums of money to try to employ staff, have lost staff, will continue to lose staff, and find it difficult to recruit staff given the challenges of the region. They noted that if Specialist Homelessness Services are required to respond outside normal hours as they have been during the flooding incidents there should be additional funding.
- One service noted that just because they are financially stable it does not mean that they are not financially impacted, for example, this service lost 10-15 cars, but there were no grants that could access.

Chapter Recommendations:

Recommendation 10: Enact a regional homelessness strategy in consultation with local Specialist Homelessness Services, with measurable outcomes to address the rising number of people experiencing homelessness. This should include:

- Trauma-informed, accessible Emergency Accommodation
- Exits into longer-term housing options

Recommendation 11: Adequately fund and support local Specialist Homelessness Services in flood-affected communities, (as opposed to only consulting with larger charities) including financial compensation for additional work during the flooding incidents, and packages for staff to prioritise sustainability of local services.

Recommendation 12: Implement guarantees to protect and build housing stock for people at risk of homelessness including:

- Replacement of lost housing stock and additional housing stock to meet the needs of people experiencing homelessness

- Prevention of rent gouging and increasing insurance costs for Specialist Homelessness Services and Community Housing Providers

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