

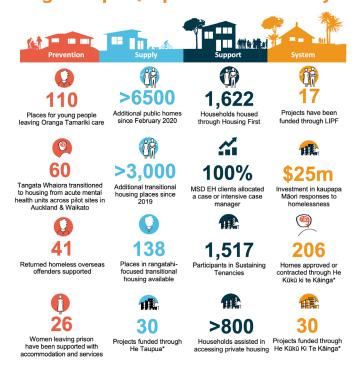
HOMELESSNESS & HOUSING DEPRIVATION

URGENT ACTION ON HOMELESSNESS

The Salvation Army has gone on record that the current state of housing in New Zealand, especially in the 'sharper end' of housing (ie, homelessness, overcrowding and emergency, transitional and social housing) is at catastrophic levels. The Homeless Action Plan (HAP) 2020–2023, accelerated during the Covid-19 lockdown periods, has had steady progress across its 18 key actions and four work streams: prevention, supply, system enablers and support. As **Figure 1** shows, the most recent HAP Progress Report highlights some encouraging changes.

But despite these changes, more is urgently needed. The 2022 Human Rights Commission's Housing Inquiry estimated there were over 100,000 people in severe housing deprivation including those without shelter, living in temporary accommodation, sharing accommodation or people living in uninhabitable housing. Numbers of public housing were at an all-time high, which the government has lauded. But the public housing supply per capita is still below the peak reached in the 1990s. Whatever way you cut the numbers, despite this steady progress on many fronts under the HAP, severe housing need and homelessness remain pressing issues, especially for our people using various Salvation Army services. This begs the question, are there other, new ideas that can help reduce rough sleeping, homelessness, and other forms of housing stress?

Figure 1: HAP Interagency Six-Month Public Progress Report | September 2022–February 2023



The following are some policy concepts or priorities that The Salvation Army promotes as key focus areas for the incoming government to focus on related to housing.

- Continue to urgently increase the supply of public housing and affordable rental options: To truly address homelessness and housing deprivation, we simply need more housing, both provided by the government and CHPs, and more affordable renting options for lower income households. We acknowledge that progress has been made, but more is needed.
- Intensive Case Managers (MSD) and Navigators (NGOs): Our 2022 paper Tales from the Trenches: The realities of housing in NZ highlighted the need for more ICMs in MSD and more housing navigators working in NGOs. We specifically

recommend that ICMs or Navigators are offered to all emergency housing special needs grants recipients, and specialised Navigators be assigned to those in severe housing need because of family violence and/or those who have children.

- Greater support for unique homelessness service providers: The unique work of groups like Orange Sky and some of the homelessness interventions within The Salvation Army need greater political support and funding, as well as increased promotion across corporate and philanthropic bodies.
- Strengthen Sustaining Tenancies programme/policy: Our people face massive issues when accessing private rental housing, particularly around high rents, and incurring debt to pay the rent. Strengthening the Sustaining Tenancies programme to help households keep their private rental or public housing tenancy is crucial, so that more families do not slip into housing stress and homelessness. At the same time, ensuring these tenancies function well with surrounding properties is vital too.
- Independent review of Housing First: The Housing First programme in New Zealand is based on international models, particularly the American Housing First policy that has been in place there for over 20 years. California has spent nearly \$4 billion on their Housing First policy since 2016. Yet, between 2016 and 2022, chronic homelessness increased by 93 percent in California, reaching levels not seen since 2005. Other similar, mixed findings have emerged across America. While there are clearly some successes in our Housing First programme, an independent review is recommended to complement the internal government evaluation and review process in place. We acknowledge Housing First is a fairly new policy for New Zealand, but robust monitoring and evaluation is vital given the investment into it and the complexity of homelessness.

STRENGTHENING TRANSITIONAL HOUSING

Transitional housing is now well-established in New Zealand, as this initiative provides temporary accommodation for individuals and whānau who don't have anywhere to live and urgently need a place to stay. Theoretically, transitional housing providers are contracted to provide appropriate housing for up to 12 weeks for clients, as well as offer other vital wraparound services where possible. The reality is that people are staying in transitional housing for significantly longer periods, simply because there are not enough long-term sustainable housing options available to transition them to. For example, in the year to June 2023, people staying at transitional houses managed by The Salvation Army stayed on average 18 weeks in our accommodation. We have also noted that in some extreme cases, people have stayed in our transitional houses for two to three years! Of course, there are several different and complex reasons and factors involved here. The major increases in transitional housing places (1100 places in June 2017 to 5900 places in June 2023) and public housing (over 13,000 new public houses cumulatively delivered since 2017) are to be acknowledged. But these surging numbers—as well as the wider context of high numbers on the social housing register, increasing numbers on sustaining tenancies and so on—all point to critical issues in our housing system, issues that we at The Salvation Army unfortunately know very well.

In this context, this raises the key question of whether increasing the number of places for transitional housing is the best policy moving forward? Clearly, transitional housing provision is one of many tools available to us. Any and all of these tools are needed given the current state of housing need in the sharper end of the housing continuum. Transitional housing in our view is definitely better than housing vulnerable whānau in emergency housing motels, campsites and so on. But in some respects, with the clogging up of the housing pipeline, as people often stay longer than the contracted 12-week time period, transitional housing almost acts as another temporary band-aid trying to cover massive fissures.

Our people using Salvation Army services need transitional housing. It is better than emergency housing in many ways. However, despite increasing supply, there's still not enough long-term appropriate public housing available to transition people to, as indicated by increasing lengths of stay in transitional housing homes. Building and delivering more public housing is the best solution. Are there other ideas?

- Entrenching the Transitional Housing Code of Practice: Since a law change in 2020, transitional housing is exempt from the Residential Tenancies Act 1986. The Code of Practice was subsequently developed. While this Code is a step in the right direction, we recommend that it is more beneficial that the rights of households are more clearly defined through legislation, with a mandated tribunal or judicial body to enforce and uphold the rights of all parties, rather than this Code for transitional housing providers to follow.
- Sunset strategy for transitional housing: Transitional housing exists because of the massive need identified and the failure of successive governments to commit to consistently build public housing for poorer people. But is there an actual end planned for transitional housing provision? Is there, to borrow and allegorise a legal term, a 'sunset clause' or an end planned for this transitional housing strategy? Or is the government going to endlessly increase transitional housing places and providers with little or no strategic planning?
- Alignment with Community Housing Provider (CHPs) processes: CHPs are rigorously regulated by the
 Community Housing Regulatory Authority. In their submission to the Code of Practice, Community
 Housing Aotearoa (CHA) noted that, 'by contrast, transitional providers have effectively received funding
 parity with CHPs, but the processes associated with TH contracting and policy/procedure auditing are
 far less rigorous'. We strongly recommend that greater alignment is needed between the CHPs system
 and the transitional housing providers system, in terms of regulation, contracting, policy and procedure
 review, and service monitoring/review processes.

MORE ACTION ON BOARDING HOUSES

The Loafers Lodge tragedy in May 2023 shone light on a dark area of our housing system in New Zealand—boarding houses. The Salvation Army has been 'fighting' in this space for several years—supporting our people living in boarding houses through our churches and social services, advocating for tighter monitoring and regulation for this accommodation, and trying to push government and media investigations into boarding houses. Many in our communities have been fighting these fights around the generally poor state of boarding houses. These are not new problems; Loafers Lodge showed us these problems tragically persist today. But it shouldn't have surprised us. According to MBIE figures, there are over 821 boarding houses across the country, with nearly a third of these located in Auckland. Figure 2 below, taken from Max Rashbrooke's excellent investigative article on boarding houses in North and South highlights some of the recent enforcement and regulatory actions against boarding houses nationally. Even these figures point to the fact that the scale of issues relating to boarding houses are huge but also difficult to properly assess.

We are confident that all New Zealanders do not want a repeat of Loafers Lodge. For the last 10 years, The Salvation Army has been engaged in an advocacy campaign against a massive boarding house in South Auckland. Our frontline staff have inspected the premises several times and found it to be unsafe, with numerous poor conditions for the vulnerable residents. We have provided ongoing food, counselling and other support services. We made formal complaints to government ministers, government officials, Auckland Council officials and the media. We even tried to help the boarding house providers apply for social housing accreditation with HUD. This was a gigantic tragedy in waiting and we warned others and prayed for some sort of intervention. The boarding house eventually shut operations in the South Auckland site. However, it has now morphed into a more organic and hard-to-detect network of smaller boarding houses in single dwellings scattered around Auckland, still full of vulnerable and high- or complex-needs residents. We are probably more worried with this outfit now than we were beforehand. Loafers Lodge has heightened these worries further. Urgent change is needed in this space before we have more repeats of that fateful event in Wellington at Loafers Lodge.

Figure 2: Enforcement actions against boarding houses

Enforcement actions taken against boarding house owners since 2017

	2018	2019	2020	2021	2022	2023	TOTAL
Compliance agreement	5	6	5				16
Enforceable undertaking				2	2		4
Improvement notice				8	11		19
Infringement notice				2	2		4
Self-resolution	1						1
Tenancy Tribunal	2	5					7
Warning	18	8	26	11	59	9	131
Grand total	26	19	31	23	74	9	182

There have been 474 cases, involving 2579 breaches, of which 182 have resulted in action being taken.

Enforcement actions taken specifically under the Healthy Homes standards since 2017

	2019	2020	2021	2022	2023	TOTAL
Compliance agreement	1	3				4
Enforceable undertaking			2	2		4
Improvement notice			8	11		19
Infringement notice			2	1		3
Warning		11	8	52	7	78
Grand total	1	14	20	66	7	108

There have been 215 cases involving 1436 breaches, of which 108 have resulted in action being taken.

Our people are frequently living in boarding houses, especially when other housing options in emergency or transitional housing are unavailable. What can we do about this accommodation? More public housing is clearly the main answer. But what else can be done?

- Establish a national register of boarding houses: Better data is needed on boarding houses, and a national register is a good starting point.
- Stronger and clearer regulations and licensing systems: The system to regulate this accommodation is messy and disjointed, with a three-tiered system involving private companies, local and central government theoretically involved.
- Shut down the worst performers: If the regulatory system was stronger, then shutting down the worst houses would be more straightforward. There is a trade-off here because this exacerbates the numbers without accommodation. But we need to stop and avoid any repeats of these tragedies as much as possible, from a regulatory and systemic perspective.

We welcome your comments on this *Pressing Issues* election series. Please contact the authors at social.policy@salvationarmy.org.nz

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