



YWCA CANBERRA

**Submission to the 2022-2023 ACT Budget**  
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## **Acknowledgement of Country**

YWCA Canberra proudly recognises the rights of Aboriginal and Torres Strait Islander peoples to own and control their cultures and pays our respect to these rights. YWCA Canberra acknowledges the need to respect and encourage the diversity of Indigenous cultures and to respect Indigenous worldviews, lifestyles and customary laws. We extend our respect to the Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and will continue to always be Aboriginal land.

## **About YWCA Canberra**

YWCA Canberra is a feminist not-for-profit organisation that has provided community services and represented women's issues in Canberra since 1929.

Our mission is 'We strengthen communities by supporting girls and women through our services and advocacy' and our vision is 'Girls and women thriving'.

We provide essential, quality services for women, girls and families in the ACT and surrounding regions. We work in the areas of children's services, community development, homelessness and affordable housing, youth services, personal and professional training, women's leadership and advocacy.

We are externally accredited against the [Quality Improvement Council \(QIC\) Health and Community Service Standards \(7th Edition\)](#). Accreditation against the QIC standards support us to improve client and community engagement, diversity and cultural appropriateness, management systems, governance and service delivery, while committing to a cycle of continuous quality improvement. In addition to the QIC standards, we are accredited against the following external client related service standards for our key areas of work:

- [Australian Charities and Not for Profit Commission](#)
- [National Quality Standard for Early Childhood Education and Care and School Aged Care](#)
- [National Regulatory System for Community Housing](#)
- [Registered Training Organisations Standards](#)

Through our national Affiliate Association with YWCA Australia, we are part of the World YWCA network, which connects 120 countries across the globe.

## Introduction

YWCA Canberra welcomes the opportunity to provide a submission for the 2022-2023 ACT Budget. We have been consistent contributors to the ACT Budget consultation process working across Government directorates to ensure quality and appropriate community service delivery and resourcing. As with earlier submissions we address gaps in our key service delivery areas and offer observations in how effective governance and gender-budgeting is fundamental to establishing ambitious gender-equality objectives.

YWCA Canberra's frontline service operations continue to bear witness to the growing number of Canberrans in need of support. A growing cohort of this client base are in steady employment and conventional housing tenure, but despite this, can simply no longer keep pace with the cost of living in Canberra. Despite Canberra's legacy as a progressive and human rights focused jurisdiction, the privation of some can become a footnote against the story of affluence that is enjoyed by many.

Recommendations made in this submission align with recommendations outlined in our election platform [Towards 2024](#) released in October 2020 in the lead up to the ACT Election. As a member of the Children's First Alliance, a network of for purpose providers of early learning and school aged care in Canberra, YWCA Canberra supports the priorities outlined in the Alliance's submission. This submission covers the following priority areas:

1. Gender responsive budgeting and governance
2. Safe secure and affordable housing
3. A life without violence
4. Valuing early childhood education

## Priority 1: Gender responsive budgeting and governance

### Wellbeing Framework Domain: Governance and Institutions

#### 1.1 Develop a best-practice Women's Budget Statement

YWCA Canberra has consistently called for the development and publication of a standalone Women's Budget Statement. As part of this advocacy, we have provided feedback through the 2019-2020, 2020-2021 and 2021-2022 Budget consultation and Estimates processes. During both the 2019-2020 and 2021-2022 Estimate process, we specifically gave evidence on notice of what a best-practice gender-informed budget would look like. Our evidence directed the Committee to the GBA+ Annex of the 2019-2020 Canadian Budget which

included a gender report analysing all measures against a possible gender impact.<sup>1</sup> Despite this advice, the ACT Women's Budget statement has not met the expectations of best practice gender-responsive budgeting. Related to this advocacy, YWCA Canberra has also consistently called for the ACT Office for Women to be relocated to the Chief Minister's, Treasury and Economic Development Directorate (CMTEDD). This would position the women's portfolio to a central economic agency with clout and oversight for the development, analysis, and release of future budgets.

We also note the Government's Gender Impact Analysis (GIA) tool was developed by the Community Services Directorate in 2017/2018. Originally rolled out to assist in applying a gender lens to government services, funding, and programs, the GIA tool has been made available across ACT Public Service. The tool represents an opportunity for the ACT Government to lay the groundwork for both a gender responsive budget and a best practice women's budget statement. Responses to Questions on Notice<sup>2</sup> regarding the impact and possible rollout of this tool reveal that all business cases prepared for the 2021-2022 Budget "were required to *consider* gender impacts", however the use of the tool is "not tracked across the service". Given this, it is difficult to determine the extent that this tool has either been deployed or been influential in the development of government programs and funding announcements given there is no requirement or effort to track its usage.

## 1.2 Accountability of the Safer Families Levy

YWCA Canberra supports the Safer Families Levy as a sustainable revenue source for the ACT Government to respond to domestic and family violence in the long-term without the uncertainty of Budget cycles. At \$5 million/year, the Safer Families Levy has enormous potential to tangibly change the lives of women and children escaping family and domestic violence. However, as it is resourced via a progressively increasing fee against all ACT rate payers, a robust level of transparency is necessary.

Demand on our domestic violence counselling service and by extension, our housing support services continue to exceed resource capacity. Our experience is not unique, and front-line reporting indicates that accessing support can be cumbersome for women living with violence. The Smart Accommodation Report released by DVCS ACT in 2020 highlighted cases where victim-survivors were forced into homelessness in order to become

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<sup>1</sup> Government of Canada, Budget 2019 <https://www.budget.gc.ca/2019/docs/gba-acs/gba-acs-chap01-en.html>

<sup>2</sup> [https://www.parliament.act.gov.au/\\_data/assets/pdf\\_file/0007/1903714/HCW-QON-04-ANSWER-CSD-Homelessness-Gender-Clay.pdf](https://www.parliament.act.gov.au/_data/assets/pdf_file/0007/1903714/HCW-QON-04-ANSWER-CSD-Homelessness-Gender-Clay.pdf)

eligible to access support for housing while others moved back in with perpetrators of violence as safe alternatives were not available.<sup>3</sup>

We are concerned with the proportion of the Safer Families Levy that goes towards ostensibly core government expenditure, staffing costs and professional development. The line items 'delivering the family safety hub', 'safer families team' which are almost entirely used to support salaries, as well as 'training' account for nearly half of the total annual revenue collected from the levy. YWCA Canberra questions the decision to fund operational costs through the levy which when introduced was earmarked to provide enhanced community support for survivors.<sup>4</sup> We are also concerned by the proportion of the levy which has been set aside for "future priorities" (more than \$9 million, or roughly 25% of the levy accrued, over the forward estimates) when the need for urgent sector resourcing is abundantly clear.

Previous Budget submissions by YWCA Canberra welcomed the move to provide training to frontline ACT Government employees to recognise and respond to family and domestic violence. Despite the training now being expanded to all ACT Government employees, regardless of their engagement with the public, there has been no effort to revisit the funding rationale and whether the Safer Families Levy is an appropriate means to resource professional staff development. We note that the Safer Families Levy has been included as part of the 2021-2022 Audit Program and will follow the findings of this report closely.

**Recommendation 1.1a: Develop a robust 2021-2022 Women's Budget Statement in line with best practice examples.**

**Recommendation 1.1b: Track the use, effectiveness, and evaluation of the Gender Impact Analysis tool.**

**Recommendation 1.2a: Review the allocation of the Safer Families Levy with a view to improved resourcing for front-line services and their clients.**

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## **Priority 2: Safe, secure, and affordable housing**

### **Wellbeing Framework Domains: Housing and home, living standards, and social connection.**

#### 2.1 Measures to increase the supply of affordable rentals under the land tax exemption program

Since the commencement of the land tax exemption program in 2019, 100 affordable rentals have been made available through community housing providers on behalf of philanthropically focused property investors. YWCA Canberra proudly leases 62 of these affordable rentals to clients. Through this program we have seen the role this initiative can play in positively transitioning someone's life and with the provision of affordable rent we have clients who have returned to the workforce and been able to establish positive social networks.

Since the onset of COVID-19 however, the benchmark for affordable rent has dramatically increased. Unit rents are no longer insulated from these affordability pressures likely reflecting the perception of units being cheaper overall. Canberra rentals are now patently unaffordable to an increasing number of people, including individuals and families on modest incomes. The situation for renters who rely on the pension or income support is dire.

With each increase in market rents, we see an impact on the affordable programs run by community housing providers including where leases at 75% of market rate are no longer 'affordable' to the target client demographic. The ACT Government must explore levers to reduce rental pressures to tenants in the program while also incentivising greater uptake among investors. A rates exemption applied to those properties leased under the scheme at a substantially more affordable rental bracket could encourage more investors into the scheme and guarantee affordable rents for tenants.

Furthermore, while the land tax exemption program has been operational for three years now, a cap on the number of properties available under the scheme (250 dwellings) remains in place. The shortfall of affordable rentals in Canberra however remains significant with the rental affordability index indicating that as affordability issues move beyond the inner suburbs, renter efforts to avoid unaffordable rent are futile.<sup>5</sup> Canberra remains one of the country's most unaffordable metro centres for hospitality workers, couples on low incomes

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<sup>5</sup> [https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning\\_Rental-Affordability-Index-2021.pdf](https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning_Rental-Affordability-Index-2021.pdf)

and single part-time working parent on benefits.<sup>6</sup> By lifting the cap and incentivising greater uptake of the scheme, particularly among institutional investors such as super-funds, in a way that passes on rental reductions to tenants, the ACT Government can make some progress in meeting its target for affordable housing dwellings.

**Recommendation 2.1a: Remove the dwellings cap to the land tax exemption program for properties being managed by Community Housing Providers for affordable rental purposes.**

**Recommendation 2.1b: Explore the viability of a total rates exemption for investors who lease properties through community housing organisations at a substantially lower rate than that already applied.**

## 2.2 Reforms to third party appeals against social housing proposals

We note the recommendation from the Legislative Assembly Standing Committee on Planning and Urban Renewal *inquiry into engagement with development application processes in the ACT* from April 2020, which recommended the ACT Government continue to support third party appeals for planning decisions related to Development Applications. While the right to appeal decisions of government is a function of democracy, we believe the administrative review processes related to planning and development are uniquely susceptible to vexatious claims. The process is one that can be gamed by those who are motivated by delaying or scuttling approved proposals, particularly for social or affordable housing developments, rather than upholding a genuine interest in due process.

Many community groups to the 2020 inquiry raised the prohibitive cost of appeals, particularly when community groups appeal outcomes in favour of commercial development. This reality does not account for those social and community housing organisations with limited budgets, without in-house legal expertise and who are transparently operating in good faith to deliver on their mission. Further it ignores the reverse of this situation where a small number of well-resourced and organised community members access the appeals process, as well as other disingenuous claims processes, to burden community housing organisations with vexatious appeals and significant costs that mean responding to each appeal and claim ad infinitum is unviable. The low-cost barrier to begin an appeals process does not appear to be a sufficient barrier to preventing vexatious claims, and the significant cost of responding falls to the planning authority and the proponent.

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<sup>6</sup> Ibid

Tribunal reviews related to planning and development constitute the most significant portion of the Administrative Reviews undertaken<sup>7</sup> and there is a pressing need to balance the finite land resources of Canberra against the needs of a growing population. The ACT Housing Strategy sets a path for managing this growth across diverse dwelling types and affordability options. Community Housing Providers are fundamental to this strategy, yet we are subjected to expensive appeals that primarily serve to knobble our role in the strategy, providing affordable, safe, or supported housing.

**Recommendation 2.2: Third parties be precluded from appealing previously approved social and community housing development applications that have met the applicable requirements of the development application process.**

### 2.3 Affordable release of land to Community Housing Providers

The first months of 2021 saw the biggest spike in Australian house prices of the last 17 years.<sup>8</sup> This trend continued throughout the year and the price index on houses in Canberra peaked at nearly 29% by the December Quarter.<sup>9</sup> More tempered growth (+9%) was seen in unit prices. For many single parents, older women and nuclear families on modest incomes trying to compete in rental or buyer markets, the unaffordability of housing is precluding them from achieving greater wellbeing rather than the presentation of any underlying complex needs.

Community housing providers are well-positioned to meet this growing need with high levels of tenant satisfaction for community housing providers relative to public housing.<sup>10</sup>

Community housing developments, like our proposed Y-Homes build for older women and women escaping violence in Ainslie, can play a significant role in lifting supply but require substantial amounts of capital.

We support the National Housing Finance and Investment Corporation (NHIFIC), an Australian Government initiative established in 2018, to incentivise investment in social and affordable housing by lowering the cost of finance for community housing providers. The NHIFIC funding model presents a valuable opportunity for community housing providers to increase the supply of affordable housing by accessing land packages. In most states and territories these land

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<sup>7</sup> [https://www.acat.act.gov.au/\\_data/assets/pdf\\_file/0005/1887404/ACAT-Annual-Review-2020-21\\_FINAL.pdf](https://www.acat.act.gov.au/_data/assets/pdf_file/0005/1887404/ACAT-Annual-Review-2020-21_FINAL.pdf)

<sup>8</sup> <https://www.canberratimes.com.au/story/7147311/biggest-spike-in-house-prices-in-17-years-recorded/>

<sup>9</sup> [https://www.treasury.act.gov.au/\\_data/assets/pdf\\_file/0007/399985/RESPROP.pdf/\\_recache#:~:text=Residential%20property%20prices%20in%20Canberra,in%20the%20September%20quarter%202003](https://www.treasury.act.gov.au/_data/assets/pdf_file/0007/399985/RESPROP.pdf/_recache#:~:text=Residential%20property%20prices%20in%20Canberra,in%20the%20September%20quarter%202003)

<sup>10</sup> Report on Government Services (2021) Table 18A. 42 <https://www.pc.gov.au/research/ongoing/report-on-government-services/2021/housing-and-homelessness/housing>

packages are released to CHOs, at affordable rates which assist in managing the ‘funding gap’ between the operational costs and the tenant’s rental payment.

In the ACT however, where the release of land packages to the market constitutes a significant revenue source, the accessibility and usefulness of NHFIC is variable. It is our view, that the relationship between land release and the Territory’s bottom line creates strong reluctance on the part of the Territory Government to release packages at affordable rates to CHOs and to date no NHFIC finances have been released for community housing use in the ACT. This substantial barrier effectively holds up community housing investment across a growing Canberra meaning more people whose only need is affordable rent are subsisting in unaffordable private rentals or turning to other forms of housing assistance at cost to both the government and broader community wellbeing.

We urge the ACT Government to explore opportunities for NHFIC financing to be made available for Community Housing Organisations on terms that provide immediate capital relief for providers while also achieving some sustainability for the ACT Government revenue stream.

**Recommendation 2.2: Lift the supply of properties available through community housing providers by implementing strategies that lead to more affordable purchasing, shared equity or improved targeting of affordable releases.**

### **Priority 3: A Life without violence**

**Wellbeing Framework Domains: Safety and health.**

#### 3.1 Implementation of the “Listen. Take action to prevent, believe and heal” report.

YWCA Canberra was a member of the Sexual Violence Prevention and Response taskforce, established by the Minister for Women in 2021, and was invited to participate in the Prevention working group. We also welcomed the final report developed by the taskforce and handed to the government. The *“Listen. Take action to prevent, believe and heal”* found the justice system frequently retraumatised survivors of sexual violence, that confidence in acceptable and proportional criminal justice outcomes was diminished among survivor advocacy groups and that system wide reform would be needed to change this story for future generations.

We support the 24 recommendations presented to the ACT Government which present an opportunity for reform across education, legislation, justice responses, government funding agreements and workplace safety more broadly. As a feminist organisation with a focus on

providing leadership and empowerment opportunities to young women and non-binary people, we have been longstanding advocates for legislative reform and have participated in previous consultation rounds on amendments to the Crimes Act, including on stealthing and positive consent. And we have welcomed the recent passage of these amendments into the ACT Crimes Act.

Legislative reform should not exist in a vacuum, however. Rather, an understanding of an individual's rights when it comes to negotiating the terms of a sexual encounter as well as accommodating access to justice following an alleged sexual assault demands both a legislative and social response. The "*Listen. Take action prevent, believe and heal*" report acknowledged this and called for comprehensive and best practise relationships and sexuality education to be rolled out across ACT schools. Given the longstanding public advocacy on this issue from several sector networks including the Relationships and Sexuality Education Alliance as well as the scope of inquiries and reports which have made similar recommendations, including the *Respect@Work* report we urge the ACT Government to implement this recommendation without delay.

**Recommendation 3.1a: Implement and resource the recommendations of the *Listen. Take action prevent, believe and heal* report into sexual violence prevention and response.**

**Recommendation 3.2b: Given the already substantial evidence base, progress implementation of Relationships and Sexuality Education in the ACT as recommended by the *Listen. Take action prevent, believe and heal* and the *Respect@Work* report.**

## **Priority 4: Valuing Early Childhood Education and Care Wellbeing Framework Domains: Education and lifelong learning**

### 4.1 Children's First Alliance

As a member of the Children's First Alliance, we contributed to the Alliance's Budget submission. We support their calls for greater investment in early learning to improve access and service sustainability and to value early educators.