## **Statement from Women with Disabilities Victoria on the Australian Building Codes Board Options Paper on Accessible Housing**

**Introduction**

Women with Disabilities Victoria (WDV) welcomes the opportunity to contribute to the Australian Building Codes Board (ABCB) Options Paper on Accessible Housing. WDV supports submissions on the Options Paper by the Australian Network for Universal Housing Design’s (ANUHD). For women with disabilities to have increased access to secure, affordable and appropriate housing, we agree with ANUHD that:

* Regulation to make new housing accessible for everyone is critical to the achievement of the Council of Australian Government’s (COAG) goal of social inclusion and livable communities in Australia;
* Given the anticipated demographic changes in the next 30 years, most housing will need to be accessible at some time during its life-cycle to meet the needs of residents and their visitors;
* Despite the lack of comprehensive quantifiable data, there is ample evidence on the need for accessible housing, including the need to mandate it without delay;
* That the National Dialogue for Universal Housing Design’s agreement in 2010 to provide accessibility in new housing voluntarily has failed;
* The barriers to the voluntary provision of accessible housing cannot be ascribed simply to a lack of demand - the real causes are varied and complex and are inextricably tied to how the current housing market works, and the powerlessness of the people who need accessibility the most; and
* Previous cost/benefit analyses in Australia have supported the mandating of accessibility standards to at least the LHDG Silver Level. Given the ageing of Australia’s population and the decade of delay, further cost benefit analyses, we support mandating accessibility at the LHDG Gold Level (Option 3).

**The impacts on women with disabilities**

Compared to men with disability and women without disabilities, women with disabilities experience substantial housing risk, are more likely to experience and face homelessness and are much more likely to be affected by the lack of affordable housing.[[1]](#footnote-1) Women with disabilities are over-represented in the main factors that increase the risk of homelessness, including: lack of affordable, secure housing, unemployment, inadequate income and superannuation, and exposure to high rates of family violence.[[2]](#footnote-2)

We also make the link between a lack of housing choices and the rates of family violence experienced by women with disabilities. Recently, the Victorian Royal Commission into Family Violence found that women with disabilities experience all kinds of violence at higher rates, increased severity and for longer than other women. Having better access to a range of suitable, safe and accessible housing choices can prevent family violence. Women with disabilities who have physical access requirements and/or on lower incomes have reduced housing options, with many options being neither accessible, nor adaptable. This issue is evident at the response end of the family violence system, where family violence refuges report that while it is difficult to find exit options for all women leaving refuge, this is even more difficult for women and children with disabilities. Without any other accessible options, particularly in the private rental market, women are moved into hotels, rooming houses and supported residential services, which are often unsuitable and unsafe. Further, the lack of exit options also act as a deterrent for family violence refuges to accommodate women with disabilities in the first place.

This situation is exacerbated by acute lack of accessible public housing stock. In the private rental market, which is not covered under the *Disability Discrimination Act* 1992 (Cth), many women with disabilities experience discrimination from private landlords and real estate agents, or if they do secure rental properties, security of tenure, expensive modifications and location, are all factors of concern.

**Housing affordability**

We also make the connection between housing accessibility and affordability. Anglicare’s [Rental Affordability Snapshot](http://t.ymlp272.net/mehwuaaaesueqazaumsalabms/click.php) (2015) showed less than two per-cent of Australian rental properties are affordable for people with disability. In metropolitan areas the situation is even worse, with just 51 of 51,357 Australian properties affordable for people on the Disability Support Pension (DSP).[[3]](#footnote-3) Most of these affordable properties are inaccessible for people with disabilities. Many will also not be near accessible transport, employment opportunities and services. Additionally, seeking affordable housing often means moving away from friends and supports and becoming isolated. In Victoria, women comprise the majority of adults living in poverty (54.1% or 311,800 women) and more than one third of adults living in poverty have a disability (34.3% or 197,600 people).[[4]](#footnote-4)

**Conclusion**

One of the policy directions in the National Disability Strategy (NDS) includes “improv[ing] access to housing options that are affordable and provide security of tenure.” By mandating minimum accessibility features at the LHDG Gold Level (Option 3), the NCC will work towards COAG’s goal of creating social inclusion and livable Australian communities, and supports the Australian Government’s policy objectives of ‘ageing in place’. Women with Disabilities Victoria joins other organisations and individuals in support of ANUHD’s call for Gold Level (Option 3) minimum access features to be included in the National Construction Code (NCC) for all new and extensively modified housing.

## **About Women with Disabilities Victoria**

Women with Disabilities Victoria is a membership-based organisation run by women with disabilities for women with disabilities. Our members, board and staff live across the state and have a range of disabilities, lifestyles and ages. We are united in working towards our vision of a world where all women are respected and can fully experience life.

To advance real social and economic inclusion for women with disabilities in Victoria, we act as a voice for women with disabilities, create opportunities to be visible and to be heard, build partnerships and engage the community to challenge attitudes and myths about women with disabilities.

Our gender perspective allows us to focus on areas of particular inequity to women with: access to women’s health services, gendered National Disability Insurance Scheme (NDIS) services and safety from gender-based violence. We undertake research and consultation. We provide professional education, representation, information and leadership programs for women with disabilities.

We have dedicated particular attention to the issue of men’s violence against women with disabilities, due to its gravity and prevalence in our lives. Since 2009 we have had a Policy Officer, funded by the Victorian Government, to focus on violence against women with disabilities. This has been a valuable resource for the community sector and government. Our representation at the Royal Commission into Family Violence in Victoria (RCFV) contributed to sixteen RCFV recommendations with specific disability content, and our representation to the Victorian Parliamentary Inquiry into Abuse in Disability Services resulted in a chapter on gender in the Committee’s final report.

We also work to make the NDIS relevant and responsive to women with disabilities, empower women through our Enabling Women Leadership and Enabling Women Mentoring Programs and promote access to health services for women with disabilities. In focusing on these areas, we are guided by our members. We will wherever possible respond to new and emerging issues to stay relevant and reflect the concerns of women with disabilities.

Pictured: Women with Disabilities Victoria members, associate members, board, staff and supporters.

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1. Australian Human Rights Commission (2010) Australia’s Implementation of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). See also: Australian Cross Disability Alliance (ACDA) (2016) Submission to the CRPD Committee 14th Session ‘Day of General Discussion (DGD) on the right of persons with disabilities to live independently and be included in the community’; 19th April 2016; Prepared by Carolyn Frohmader for the Australian Cross Disability Alliance (ACDA). Women with Disabilities Australia (WWDA), 2018. The Status of Women and Girls with Disability in Australia (2018). WWDA: Hobart, Tasmania. [↑](#footnote-ref-1)
2. Homelessness Australia, ‘Homelessness and Disability’, (2016), <https://www.homelessnessaustralia.org.au/sites/homelessnessaus/files/2017-07/Homelessness%20and%20disability_0.pdf>. [↑](#footnote-ref-2)
3. People with Disabilities Australia, ‘Snapshot a wake-up call on affordable, accessible housing.’ PWD. 30th April, 2015. [↑](#footnote-ref-3)
4. Tanton, R., Peel, D. and Vidyattama, Y., (2018), ‘Poverty in Victoria’, NATSEM, Institute for Governance and Policy Analysis (IGPA), University of Canberra. Report commissioned by VCOSS. [↑](#footnote-ref-4)