



Gender, Safety, and Specialist Disability Accommodation in Victoria

Submission to the Draft Specialist Disability Accommodation Tenancy Matching Policy Consultation

26 MAY 2025



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Language Note

This submission is informed by and reflects the lived experiences of women and gender diverse people with disabilities. It draws on two consultations in March and April 2025 and eight survey responses from women and gender diverse people with disabilities.

We acknowledge that while some concerns raised are shared across gender-marginalised communities, the experiences of gender diverse people warrant specific and direct exploration, particularly regarding safety, autonomy, and systemic barriers in housing. **Women with Disabilities Victoria (WDV)** does not seek to speak for or replace the role of organisations led by and for LGBTIQ+ people with disabilities. Instead, we aim to work in coalition with them and amplify areas of shared concern.

This submission uses 'person first' language (women and gender diverse people with disabilities). We acknowledge that people describe their experience of disability in different ways, and for many people, 'identity first' language is a source of pride and resistance.

Acknowledgment of Country

WDV respectfully acknowledges First Nations people as the Traditional Custodians of the lands and waters on which we work, rest, and continue to benefit from. We pay our respects to the Elders, past and present, of First Nations communities across Victoria and acknowledge that their continued strength and resilience are built upon more than 60,000 years of history. The WDV community is committed to honouring the unique cultural and spiritual relationship First Nations peoples have with the land and waters, and their rich contribution to society.

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About the Authors

WDV is a not-for-profit Disabled People's Organisation (DPO) representing women and gender diverse people with disabilities in Victoria. The organisation is operated by and for women and gender diverse people with varied disability experiences. WDV has a diverse membership of people from different backgrounds. Women and gender diverse people with disabilities face intersecting forms of structural gender and disability discrimination. WDV actively advocates for our rights to safety and respect, with particular emphasis on disability policy, health services, violence prevention, workforce development, and leadership. WDV



envision a world where all women and gender diverse people are respected and can fully experience life.

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Executive Summary

This submission responds to the Draft Specialist Disability Accommodation (SDA) Tenancy Matching Policy. It is informed by consultations with our Gender and Disability Experts by Experience Advocates and Regional Hub members, and a targeted survey of eight WDV members with lived experience of SDA (See Appendix 1). We aimed to assess how the draft policy aligns with and addresses the needs of women and gender diverse people with disabilities.

While the Government's draft policy articulates a commitment to choice, control, and safety, it lacks the structural safeguards required to genuinely protect and empower women and gender diverse people with disabilities.

WDV welcomes the policy's direction, but recommends several changes to support the needs, experiences, and concerns of people navigating the SDA system.

The recommendations below aim to embed a people-centred, rights-based, and gender-responsive framework in the tenancy matching process—one that prioritises safety and autonomy for all SDA residents.

Key Recommendations:

Recommendation 1: Make House Inspections and Compatibility Meetings Mandatory

These must occur before applications are submitted, with meaningful input from applicants (or their representatives) and current residents.

Recommendation 2: Embed Gender-Responsive, Trauma-Informed Risk Assessment

Introduce and embed specific safeguards to address gender-based violence and trauma histories when matching tenants to homes.

Recommendation 3: Extend follow-up meetings and support

Include multiple non-intrusive follow-up meetings and transparent mechanisms for raising concerns for new and established residents. Include clear provisions for relocation and mechanisms to learn from tenancy breakdowns.



Recommendation 4: Provide Contextual Information on Local Services and Neighbourhoods

Include detailed, accessible information about proximity to healthcare, cultural, community, and transport services so that applicants can make informed decisions about their compatibility with an SDA home and the broader community in which it is located.

Recommendation 5: Fund Peer and Advocacy Support

Ensure home seekers have access to independent advocates or peer workers throughout the entire process of looking, applying, visiting, moving, and settling into a new home.

Choice, Control, and Compatibility

WDV Member Insight

"[My experience of SDA] was positive at first, until the National Disability Insurance Scheme (NDIS) put a person with severe behaviours of concern into housing designated for people with physical disabilities. The person is now putting residents at risk. They feel unsafe, as do their support workers. They don't feel safe going outside their property into the common area."

The draft policy commendably centres choice and control by including steps such as house inspections and meet-and-greet opportunities. However, these actions are presented as optional ("where possible") rather than required, leaving gaps in accountability.

Meaningful choice must be underpinned by:

- Mandated compatibility meetings before application submission
- Transparent information about who currently lives in the home and their needs
- The ability for both current and prospective residents to decline placements based on incompatibility

Recommendation 1: Make House Inspections and Compatibility Meetings Mandatory

These must happen before application submissions and include both applicants and current residents.

Compatibility should be considered holistically, including lived experience, gender, and trauma histories.

A similar process should apply to staff, especially those who stay in accommodation overnight.



Safety and Risk Management

WDV Member Insight

“The government needs to ensure that people will be safe in shared homes or shared properties. They are placing people who are potentially dangerous to others with vulnerable people, with no thought or concern for their safety.”

The policy includes safety as one of five assessment criteria, but it does not explicitly address gendered risks, trauma histories, or the need for gender-responsive housing options. WDV does not believe that people with disabilities are vulnerable people; rather, they are made vulnerable by the systems and processes with which they engage. Safety and risk management must consider and be responsive to the lived experience and intersecting marginalisations experienced by people with disabilities.

WDV urges the Department of Families, Fairness, and Housing (the Department) to include mandatory gender-responsive and trauma-informed safeguards to protect residents from:

- Placement with people who exhibit behaviours that jeopardise the psychological and physical safety of others.
- Staff or co-residents who may trigger trauma responses
- Unsafe neighbourhoods or inaccessible services

Recommendation 2: Embed Gender-Responsive, Trauma-Informed Risk Assessment

Develop specific tools to assess and address risks of gender-based violence (including coercive control) and trauma.

Ensure applicants and residents have privacy, autonomy, and the right to opt out of placements without compromising their ability to access other SDA homes.

Recommendation 3: Extend follow-up meetings and support

Conduct multiple follow-up meetings and ensure a pathway for residents (both new and established) to raise concerns, request relocation, or access support.

Track and report on tenancy breakdowns and reasons for incompatibility to strengthen future tenancy matching.



Informed Decision-Making and Peer Support

WDV Member Insight

"[Potential residents] definitely need to meet all the people they will be sharing the home with. They need to know that if at any time the mix of residents changes [...] there is someone to speak to if they start feeling unsafe in the home, and that they will be listened to and their concerns will be validated..."

The draft policy provides for a six-week follow-up meeting after a move. While positive, this is insufficient given the risks and often lengthy adjustment period. Our members report feeling uninformed about services, staffing, and housing rights until it was too late.

WDV Member Insight

"It is scary when you are trying to get into something like this, trust me, but with support from people who have done it themselves, like myself, this would make the process a lot easier"

The policy is also silent on access to independent advocacy or peer support during the matching process.

Our members stressed that navigating SDA requires experience, systems knowledge, and confidence—which many applicants, especially those with cognitive or psychosocial disabilities, may not have. While Specialist Housing Coordinators can provide some support to residents and applicants, peer support and independent advocates provide a distinct and essential role that is better equipped to centre lived experience and individual rights.

Finally, housing should support connection and community integration, not isolation. Feeling comfortable, safe, and connected in your home is about more than compatibility with your co-residents and support workers; it is also about inclusion within the wider community. Tenancy-matching must take community and service accessibility into account to support community integration.

WDV Members want:

- Clear, detailed information about housemates, staff, and local services
- Input into staff selection
- More follow-up check-ins after moving in
- Access to peer support and independent advocates



Recommendation 4: Provide Contextual Information on Local Services and Neighbourhoods

Include service access (e.g., transport, health, culture, community) in home listings.

Ensure residents can make informed decisions about lifestyle fit, not just clinical match. This could include information relevant to sexuality, religion, language, and culture, as requested by applicants. It should also include information about accessibility, local services, and communities near the SDA home.

Recommendation 5: Fund Peer and Advocacy Support

Independent advocates and peer workers must be embedded at all stages of the tenancy matching process.

Conclusion

While the draft policy outlines positive procedural intentions, it lacks the structural and cultural safeguards necessary to ensure safety and autonomy for women and gender diverse people with disabilities.

We urge the Department to strengthen the policy by embedding a rights-based, gender-responsive, trauma-informed framework that is co-designed with people who have lived experience of SDA.



Appendix 1: Member Survey Data

Purpose and Structure

This appendix supplements the submission made by WDV to the Victorian Government's Draft SDA Tenancy Matching Policy Inquiry, presenting insights from members of our organisation based on their lived experience of SDA.

Comments and responses are presented to illustrate member experiences and to share their suggestions for system improvement firsthand.

Methods

Data Collection and Participant Recruitment

A short 13-question survey was developed, combining questions from the Victorian Government's open SDA survey with additional questions focused on the needs and experiences of women and gender diverse people with disabilities.

The survey was open for one week. Participants were recruited via a single email to the WDV Members' mailing list. An email was also sent to WDV staff, including our Youth and Gender and Disability Experts by Experience Advocacy teams, requesting that staff who were also WDV Members complete the survey. The survey received eight responses.

Limitations

Due to short Government consultation timeframes and WDV staffing constraints, our SDA member survey was only open for one week and received eight responses. As such, the data collected does not reflect the breadth of women and gender diverse people with disabilities' experiences of SDA in Victoria. Nonetheless, our findings are consistent with consultations with our Experts by Experience Advocates and Regional Hub members, who have identified housing access, safety, and autonomy as critical issues.

Member Insights

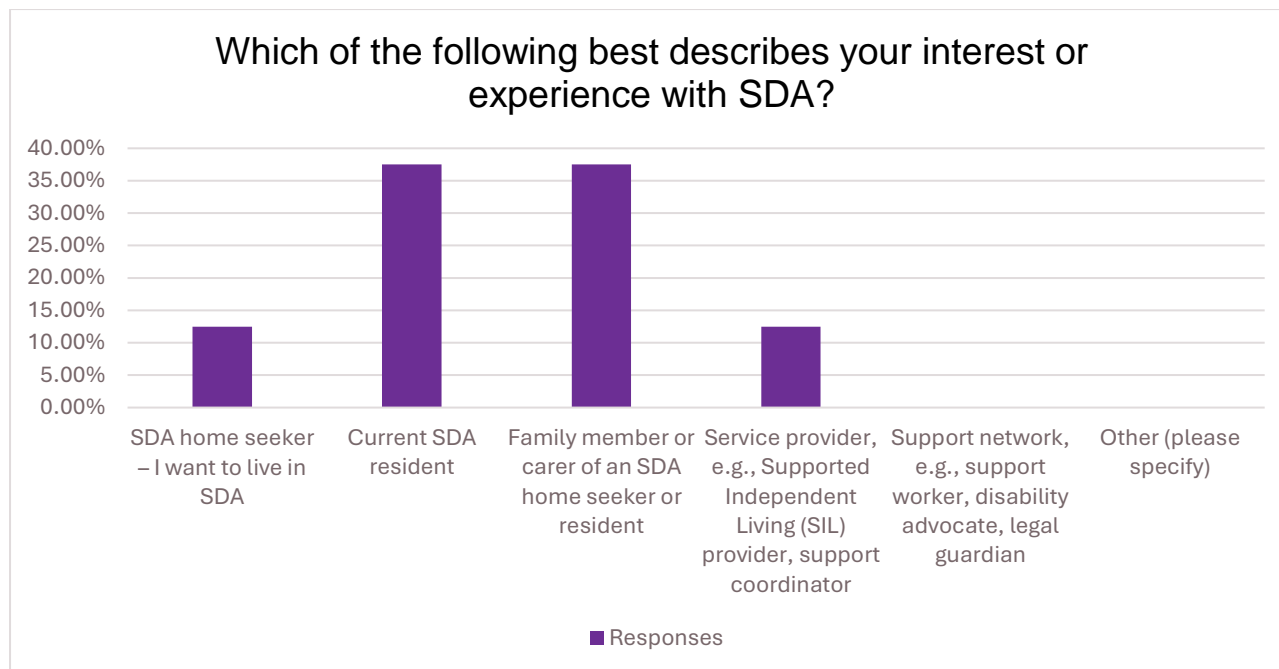
Question 1

Respondents were asked to describe their interest or experience with SDA

- SDA home seeker – I want to live in SDA, 12.5%
- Current SDA resident, 37.5%
- Family member or carer of an SDA home seeker or resident, 37.5%
- Service provider, e.g., Supported Independent Living (SIL) provider, support coordinator, 12.5%



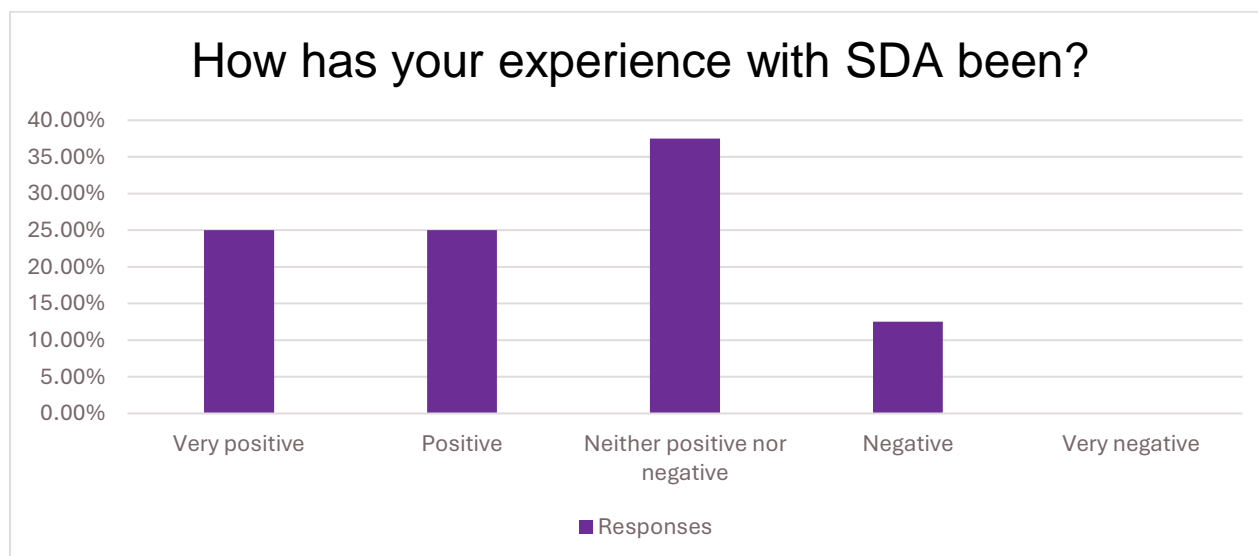
- Support network, e.g., support worker, disability advocate, legal guardian, 0.0%
- Other (please specify), 0.0%



Question 2

Respondents were asked how positive or negative their experience with SDA has been

- Very positive, 25.0%
- Positive, 25.0%
- Neither positive nor negative, 37.5%
- Negative, 12.5%



Respondents commented:

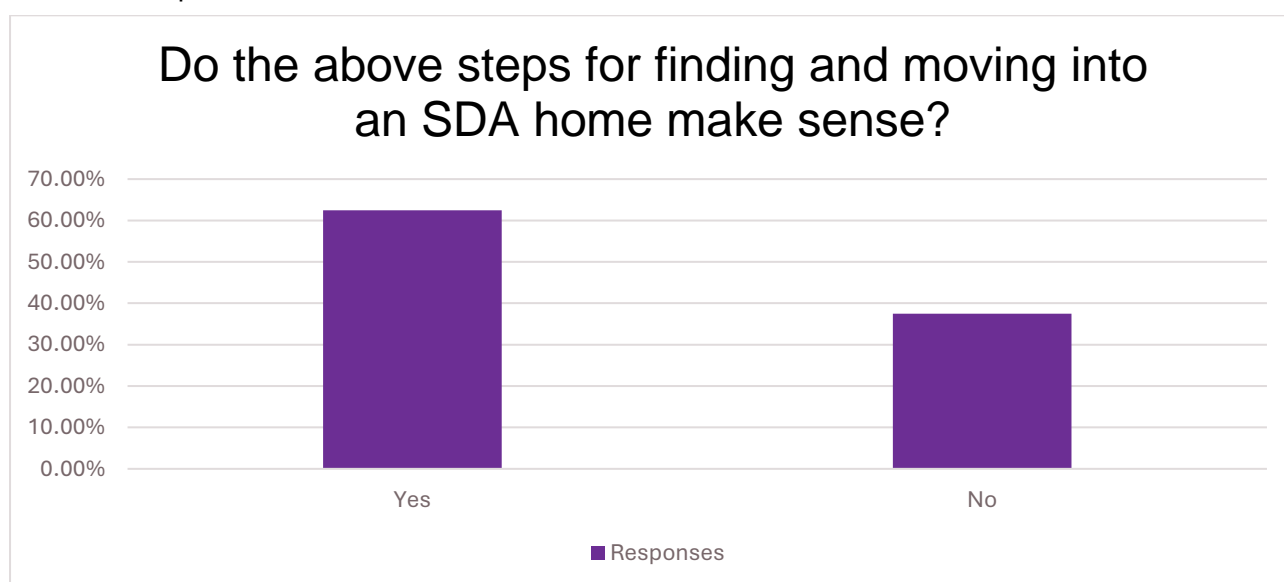
- “I have worked my whole career (over 30 years) in SDA and supporting SDA. While there are pockets of great homes, supported by great staff, these are the exception to the rule.”
- “My daughter's SDA experience was generally positive, although she was moved around a lot from one house to another.”
- “Information on housing choices should be aligned and linked to services accessible in the area. It's been problematic finding out what day programs, social and recreational activities, etc, are available in that housing area.”
- “Lovely apartment, although being between a busy road and a railway line can make it very noisy when the balcony doors are open.”
- “Better training of in-house support needed.”
- “Was positive at first, until the NDIS put a person with severe behaviours of concern into housing designated for people with physical disabilities. The person is now putting residents at risk. They feel unsafe, as do their support workers. They don't feel safe going outside their property into the common area.”

Question 3

Respondents were asked whether the Victorian Government's steps for finding and moving into SDA homes made sense.

Of the respondents,

- 62.5% responded, 'yes'
- 37.5% responded, 'no'



The respondents who answered 'no' commented:



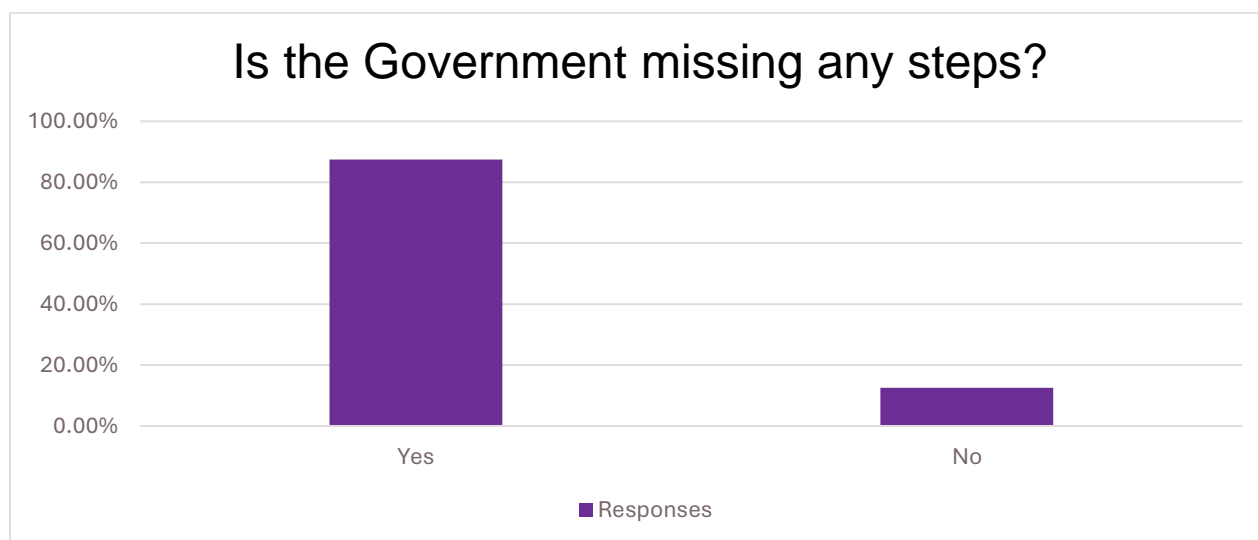
- “It does not include considering the funding you have to find the right home, or the overwhelming, difficult and lengthy process to secure adequate funding for the right home.”
- “[...] service provision should be linked to housing choices. How can I decide which home to place my brother into, if I am struggling to locate information on what services he can access if living in said location?”
- “Getting NDIS funding comes before that and is the hardest part.”

Question 4

Respondents were asked whether the Victorian Government was missing any steps.

Of the respondents,

- 87.5% responded, ‘yes’
- 12.5% responded, ‘no’



Respondents commented:

- “Securing funding for SDA or sufficient funding for your needs. Also safeguarding: choosing a safe home, choosing a safe, skilled service, choosing the right staff to meet your preferences, etc.”
- “It should be an easier process and a lot less confusing, designed by people with disabilities who want to move into SDA.”
- “Finance and cost.”
- “Service provision (adult day training services, free or subsidised social and recreational activities [run by community or not-for-profit groups] as well as organisations offering private support, and any other relevant information such as healthcare providers [General Practitioners, medical specialists, allied health, etc.]). Plus, [potential residents] need to meet all existing residents.”
- “Multiple visits with trials of all common spaces.”



- “The government needs to ensure that people will be safe in shared homes or shared properties. They are placing people who are potentially dangerous to others with vulnerable people, with no thought or concern for their safety.”

Question 5

Respondents were asked about the problems they thought women and gender diverse people with disabilities experienced when they needed a new home. For example, their parents/guardians don't want them to leave their current home.

Respondents commented:

- “Caregivers fear. Well-meaning, but damaging perceptions that people with intellectual disabilities are 'eternal children', preventing independence and age-appropriate risk taking.”
- “Funding constraints and overly burdensome fight to get appropriate funding (only possible if you have strong advocates, who know the system and are generally not from a Culturally and Linguistically Diverse Background).”
- “Not enough understanding about why women need accommodation because we are more vulnerable, for example, I needed to get out of where I was living from the Department of Human Services housing because there was drug dealing and knife attacks. [There were] gunshots around my area and instead of taking a month of moving it took six months which almost destroyed me because I was so anxious because I didn't know if I was gonna live or die so that's why women need to be protected and that's why I want to be a part of change.”
- “Safety issues. Parents/guardians wanting to protect people with disabilities from harm or abuse.”
- “Resistance from support.”
- “They need to be safe. They need to not have men with behaviours of concern living with or near them.”

Question 6

Respondents were asked about the problems they thought women and gender diverse people with disabilities experienced when they looked for a new home. For example, applying for a new home is difficult

Respondents commented:

- “Lots and lots of dodgy providers, who are now in the system for profit, or have very limited disability experience.”
- “NDIS states the [person with disabilities] has 'choice and control'; however, this is only for those who have the agency to exercise it.”



- “Families and supports for the person often do not have the skills or capacity to know what a good service should look like. To know whether what is being promised is real or not.”
- “Not enough women with disabilities are getting more employment to [...] help out other women. People [without disabilities] are put in this employment situation and not knowing about people with disabilities, and how to help. If more employment opportunities around this area were offered to women with disabilities, then this would dramatically change [SDA housing], and [bring] a different perspective. For example, women with cerebral palsy like myself, women that are blind helping people with disabilities who are blind, and so forth.”
- “Government red tape. Understanding the system. Safe neighbourhood. Access to services and amenities. Privacy.”
- “Getting funding.”
- “[Potential residents] must be provided with transport and assistance to help them visit, inspect and make a decision on their potential new home. They should feel that they will be comfortable and safe living in their new home.”

Question 7

Respondents were asked about the problems they thought women and gender diverse people with disabilities experienced when visiting a new home or meeting other people living there. For example, the new home is inaccessible.

Respondents commented:

- “You are not meeting the staffing team who will [be] your support. You often have very limited time to make a real choice. Are you provided with accurate information about who you will live with? How do you know if there will be safeguards in place if things don’t go well?”
- “Accessibility to get into places and [...] people not having a disability and not understanding women’s needs, you need to have women with a disability to help other people with disabilities, and this is called meaningful employment.”
- “Home not accessible. Limited privacy. Shared facilities. Housemates don’t get along. Size of the house and yard. Parking for visitors. Access (door keys, etc.). Pets.”
- “Incompatible personalities.”
- “[Potential residents] definitely need to meet all the people they will be sharing the home with. They need to know that if, at any time, the mix of residents changes, and that doesn’t suit them, they will be assisted in finding somewhere else to live. They need to know that there is someone to speak to if they start feeling unsafe in the home, and that they will be listened to and their concerns will be validated. If the house is inaccessible and changes can’t be made, then they can’t live there. They also need to know any house rules, how privacy is provided, etc.”



Question 8

Respondents were asked about the problems they thought women and gender diverse people with disabilities experienced when moving into a new home. For example, it is difficult to organise movers.

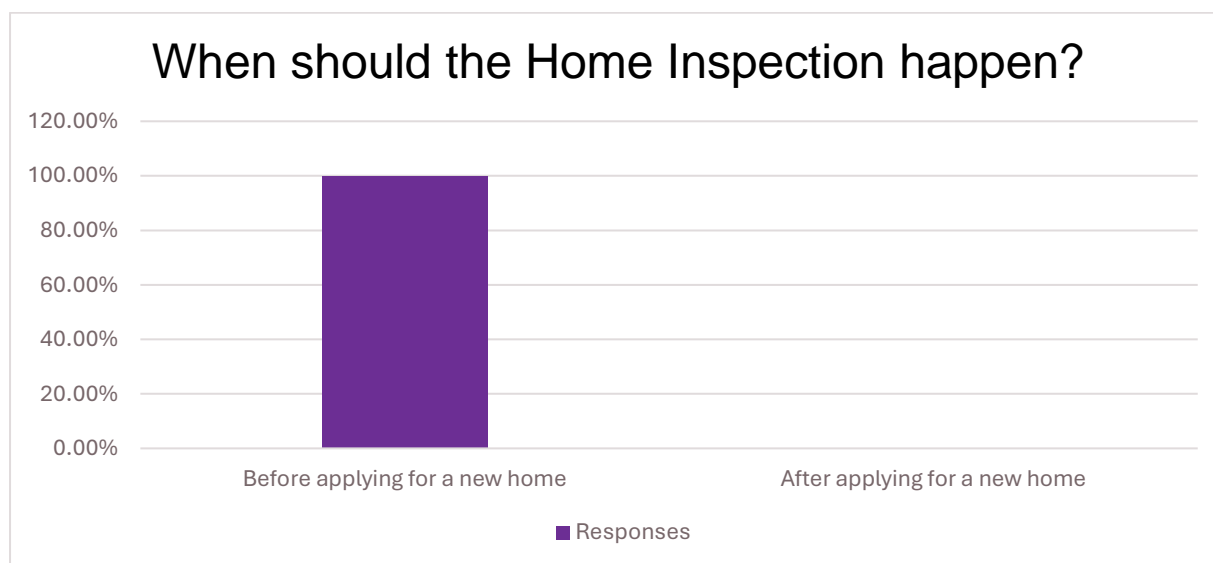
Respondents commented:

- "Lack of staff education, skill and oversight, for example, one SDA [staff] were forcibly shaving a female's pubic hair as it is 'cleaner' for over 2 years, with no one questioning the impact on her (she was resistant but non-verbal)."
- "High risks of assault and sexual assault in SDA."
- "Transitions are often not planned well or planned by people with (lived) experience. Staff have limited training in how best to support you. Providers prefer profit over actual support needs, and this is a highly difficult time."
- "It is scary when you are trying to get into something like this [...] but with support from people that have done it themselves, like myself, this would make the process a lot easier."
- "Will their furniture fit? Will it be safe? Is the house already furnished?"
- "Funding the move."
- "Finding someone to do everything that an abled person would have no problems with is difficult. There needs to be an easier way to find people who can pack, move belongings, and unpack at the destination. The government needs to make it much easier for people with disabilities to do the things that others take for granted."

Question 9

Respondents were asked when the home inspection should happen.

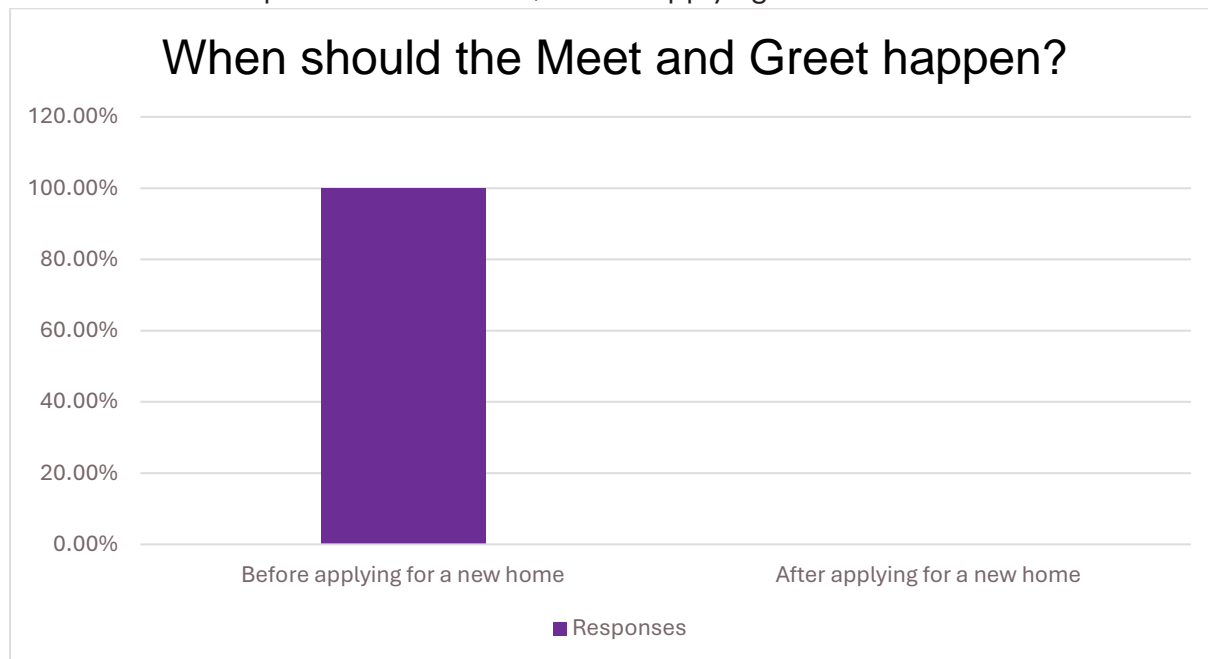
- 100% of respondents answered, 'before applying for a new home.'



Question 10

Respondents were asked when the Meet and Greet should happen.

- 100% of respondents answered, 'before applying for a new home.'

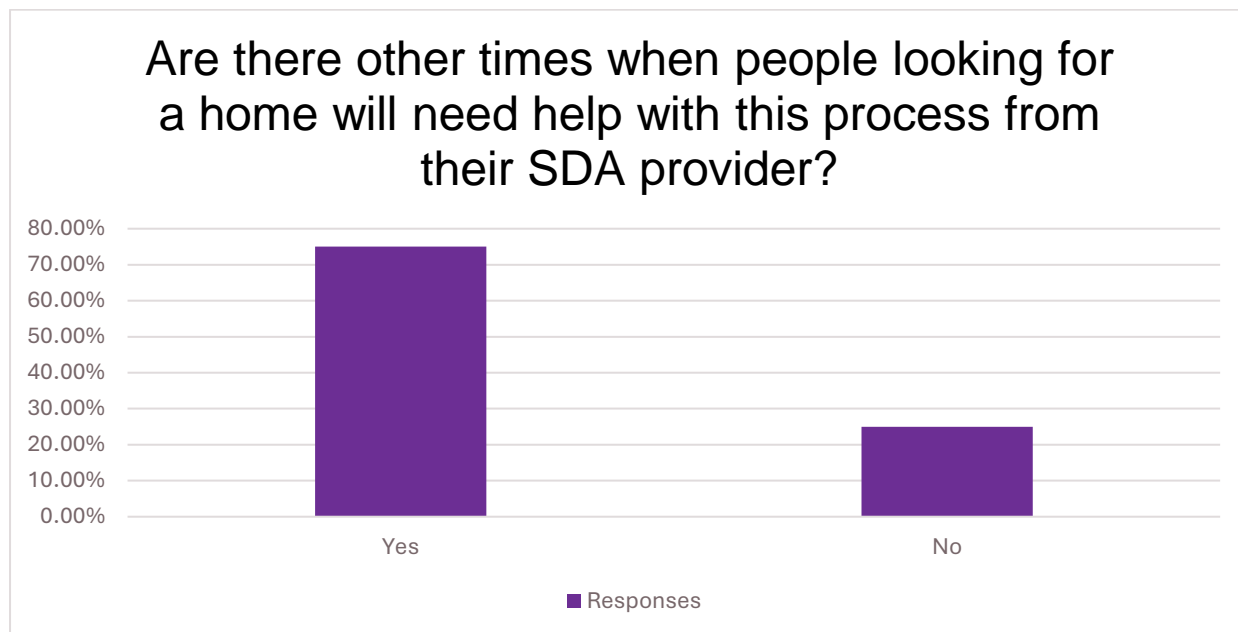


Question 11

Respondents were asked whether there were other times when people might need help from their SDA provider.

75% of respondents answered 'yes'

25% answered 'no'



Respondents commented:

- “Confirming the person’s SDA and roster of care needs with the NDIS.”
- “[SDA homes] should be compliant with [needs outlined by your] occupational therapist and your support coordinator, as well as someone with a disability that has done it before, sort of like an advocate.”
- “If [the applicants] need or want to move to another home.”
- “Getting DETAILED information about services in the area.”
- “Getting NDIS funding.”
- “Once the person has moved in, [Specialist Housing Coordinators] should check in on them in a few weeks to see if [the new resident] made the right choice.”

Question 12

Respondents were asked if there was anything else Specialist Housing Coordinators should do.

Respondents commented:

- “Report and raise concerns about providers to the NDIS. Capture reasons why SDAs fail. Work with the NDIS Quality Safeguards to identify and enable dodgy and unsafe services to cease – to protect our most vulnerable population. This is everyone's responsibility and is very difficult for the [person with disabilities] and their informal supports to navigate – as well as their biggest fear.”
- “Talk to the person with a disability who is trying to move out a lot more, and get them to meet someone who has done this before and work with them to answer questions. [Talk about] any anxieties that go with this.”
- “[...] I think it’s important that potential and existing residents get to meet each other before it's decided that a person moves in.”
- “Keep checks on people, to ensure they're safe and happy with a good quality of life where they're living [in the SDA].”

Question 13

Respondents were asked whether there was anything else they wanted the Government to think about relating to SDA.

Respondents commented:

- “What happens to those SDA residents who have very high and complex support needs? When services swoop in because of the large funding plans attached but then fail [to provide support] as they do not have the resources, skills or experience – these vulnerable residents get bumped from service to service and fall through the cracks.”
- “[content redacted for privacy] ...I know there’s a need in this department, especially having a disability and being a woman, I can understand and relate to the problems outlined for all women with disabilities and diverse backgrounds...”



- “The impact of transport costs on the persons’ ability to access services... the availability of all services [...]”
- “The Department needs to consider invisible disabled people.”
- “We don’t force able-bodied people to live with people they don’t know, unless they’re criminals. For some reason, it seems okay to put people with disabilities in with a group of strangers. This practice is so wrong on so many levels.”
- “If people with disabilities want to live alone, they should be allowed to. They shouldn’t be prevented from living alone because they have disabilities and, in most cases, are living on the poverty line. They do matter. They have rights and should be able to make a choice that suits them, not one that’s easier for the National Disability Insurance Agency!”

