

27 May 2025

HUD2025-006999 HUD2025-007148



Tēnā koe s 9(2)(a)

On 30 April 2025 Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (the Ministry) received your request for the following information under the Official Information Act 1982 (the Act):

7/04/2025 HUD2025-006730 Information on the First Home Loan: Income caps, historic uptake, and current performance

7/04/2025 HUD2025-006835 Access to Kainga Ora vacant land by Community Housing Providers

9/04/2025 BRIEFING-REQ-0011955 Monthly Report— Temporary Accommodation Service (TAS) and Tenancy Services

11/04/2025 HUD2025-006842 HUD Weekly Report

11/04/2025 HUD2025-006630 Initial advice and scope on early interventions to prevent the need for emergency housing

On 1 May 2025 you were notified that the Ministry had transferred part of your request, seeking 9/04/2025 BRIEFING-REQ-0011955 Monthly Report—Temporary Accommodation Service (TAS) and Tenancy Services, to the Ministry of Business, Innovation and Employment as the information is held by that agency.

Four documents have been found to be within scope of the remainder of your request.

In regards to the paper 'HUD2025-006842 HUD Weekly Report', we are refusing this part of your request under section 18(d) of the Act on the grounds that the information will soon be publicly available. Once publicly released, this paper will be available under the name 'Weekly Report to Ministers 11 April 2025' at: www.hud.govt.nz/search?sort=latest& type=&q=weekly+report.

Three documents are being released to you and are detailed in the attached document schedule. Some information has been withheld under the following sections of the Act:

Section of Act	Reason to withhold
9(2)(a)	To protect the privacy of natural persons.
9(2)(f)(iv)	To maintain the constitutional conventions for the time being which protect the
	confidentiality of advice tendered by Ministers of the Crown and officials.
9(2)(g)(i)	To maintain the effective conduct of public affairs through the free and frank
	expression of opinions by or between or to Ministers of the Crown or
	employees of the Ministry.
9(2)(i)	To enable a Minister of the Crown or any public service agency or organisation
	holding the information to carry out, without prejudice or disadvantage,
	commercial activities.

On 20 May 2025 the Ministry received an additional request for the following information under the Act:

I request a copy of any advice given to the Associate Minister of Housing on phase two of early interventions work under the Emergency Housing prevention work.

Two documents have been found to be within scope of this request. One of these documents is released to you under your first request above and is included in the attached document schedule, 'HUD2025-006630 Initial advice and scope on early interventions to prevent the need for emergency housing'.

The second document, '*Target 8: Fewer People in Emergency Housing Delivery Plan, July 2024*', is available on the Ministry's website at: <a href="www.hud.govt.nz/assets/Uploads/Documents/Proactive-Releases/09-Target-8-Fewer-people-in-EH-Final-Delivery-Plan-7-July-2024-REDACTED.pdf">www.hud.govt.nz/assets/Uploads/Documents/Proactive-Releases/09-Target-8-Fewer-people-in-EH-Final-Delivery-Plan-7-July-2024-REDACTED.pdf</a>. We are therefore refusing this part of your request under section 18(d) of the Act on the grounds that the information is publicly available.

In terms of section 9(1) of the Act, I am satisfied that, in the circumstances, the decision to withhold information under section 9 of the Act is not outweighed by other considerations that render it desirable to make the information available in the public interest.

You have the right to seek an investigation and review of my response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website at: www.ombudsman.parliament.nz.

As part of our ongoing commitment to openness and transparency, the Ministry proactively releases information and documents that may be of interest to the public. As such, this response, with your personal details removed, may be published on our website.

Nāku noa. nā

Mansen

Jenna Bottcher Hansen

Manager, Government Services

Te Tuāpapa Kura Kāinga – Ministry of Housing and Urban Development

#### **Annex A: Document schedule**

	Documents released – HUD2025-006999 and HUD2025-007148						
	Date	Document	Section of the Act applied				
1	7 April 2025	HUD2025-006730 Information on the first home loan: income caps, historic uptake, and current performance	9(2)(f)(iv)				
2	7 April 2025	HUD2025-006835 Access to Kainga Ora vacant land by Community Housing Providers	9(2)(a), 9(2)(f)(iv), 9(2)(i),				
3	11 April 2025	HUD2025-006630 Initial advice and scope on early interventions to prevent the need for emergency housing	9(2)(a), 9(2)(f)(iv)				



## Aide mémoire

INFORMATION ON THE FIRST HOME LOAN: INCOME CAPS, HISTORIC UPTAKE, AND CURRENT PERFORMANCE					
To Minister	Hon Chris Bishop Portfolio Housing				
Date	07/04/2025 Priority Routine				
Tracking number	HUD2025-006730				

CONTACT FOR DISCUSSION				
Name	Telephone	1st contact		
Julia Pearce	Manager, Social Housing and Other Supports	+64 4 832 2504	1	
Alex King	Advisor, Social Housing and Other Supports	+64 4 832 2553		

OTHER AGENCIES CONSULTED		
N/A		



#### **Purpose**

- 1. This aide mémoire provides the following information you requested on the First Home Loan (FHL) on 28 March 2025:
  - a. The current state of FHL income caps, including when these were last adjusted;
  - b. The agency's view on adjusting income caps; and
  - c. Overview of the current performance and uptake of the FHL.

#### **Background**

- 2. The FHL was introduced in 2019<sup>1</sup> and supports first home buyers to overcome the deposit barrier to home ownership. The FHL reduces the minimum deposit required to five percent, which is lower than what is normally required by banks.<sup>2</sup>
- 3. To qualify, buyers must meet the FHL eligibility criteria and bank lending requirements. The buyer must also contribute to the FHL insurance premium, either by paying 0.5 percent of the total loan value<sup>3</sup> upfront or having it added to their loan. The premium underwrites borrower obligations to the lender in case of a mortgagee default.

#### Information on the First Home Loan

What is the current state of the First Home Loan income caps?

- 4. As well as having the required five percent deposit available, and meeting general eligibility requirements<sup>4</sup>, FHL borrowers must meet the following income eligibility requirements:
  - a. A before-tax income from the last 12 months of \$95,000 or less for an individual buyer without dependants; or
  - b. \$150,000 or less for an individual buyer with one or more dependants; or
  - c. \$150,000 or less (combined) for two or more buyers, regardless of the number of dependants

When were the First Home Loan income caps last adjusted?

5. HUD used to review the FHL settings, including the income thresholds, every six months. The last review was in April 2023, where only changes to the FHL insurance

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<sup>&</sup>lt;sup>1</sup> Previously, the FHL was known as the Welcome Home Loan (WHL) from 2006 – 2019.

<sup>&</sup>lt;sup>2</sup> The 'standard' deposit rate from banks is 20 percent, but banks may offer lower deposits based on the borrower's financial profile and risk assessment.

<sup>&</sup>lt;sup>3</sup> Cost towards the FHL insurance premium is currently 1.2% which is shared between the borrower and the Crown, with the Crown paying the remaining 0.7 percent of the loan value.

<sup>&</sup>lt;sup>4</sup> An applicant must be a New Zealand citizen, permanent resident, or a resident visa holder who is "ordinarily resident in New Zealand", and be a first home buyer, or a previous home owner in a similar financial position to a first home buyer.



premium were made (implemented in June 2023). The FHL income caps were last adjusted in June 2022, where a new cap was introduced for an individual buyer with one or more dependants which was set at \$150,000 or less. This was introduced to reflect the changing demographics of first home buyers. Income caps remained the same for other buyers.

- 6. At the time of the review, these income caps were above the estimated median household income of \$89,867 (before tax) for the year 2021. The most recent median household income (for the year 2024) is \$105,278 (before tax), an increase of approximately 17 percent.
- 7. Annex A outlines all FHL income cap adjustments since its inception in 2003.

What is HUD's view on adjusting the First Home Loan income caps?

8. HUD's initial view is that adjusting the FHL income caps may not directly improve targeting of first home buyers who require support the most. Increasing the income caps by too much could open the FHL to those who are closer to homeownership and need less support to get over the deposit barrier, however, further analysis is required to inform this advice.

9. s 9(2)(f)(iv)

The income cap requirements are designed to support first home buyers on relatively modest incomes into homeownership of a lower quartile house.

10. s 9(2)(f)(iv)

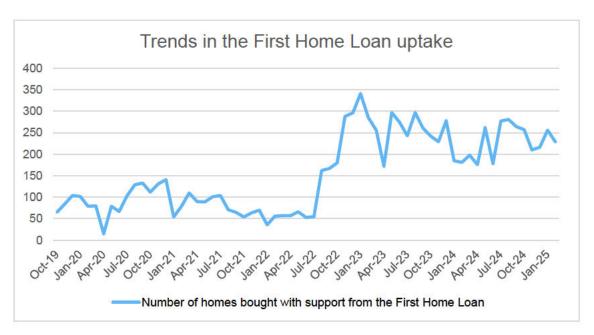
What is the historical context regarding the uptake of the First Home Loan?

11. The FHL has had consistent uptake since its inception<sup>6</sup>. Between October 2019 and February 2025, a total of 10,128 homes were bought with support from the FHL. The following graph depicts the trends of the number of homes bought since 2019.

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<sup>&</sup>lt;sup>5</sup> Which was the data utilised in establishing these most recent income caps. Data obtained from the Stats NZ Household Economic Survey.

<sup>&</sup>lt;sup>6</sup> This dataset refers to the period following the rebranding to the FHL in October 2019.



12. The peak in mid-late 2022 denotes the period following the most recent changes to the income cap.

#### What is the current performance of the First Home Loan?

- 13. The past six months has seen 1,432 homes being bought with support from the FHL with an average of 238 houses bought per month. This indicates that the FHL is assisting people into housing at a rate consistent with previous years.
- 14. The full impact of removing the First Home Grant (FHG) in 2024 has yet to be analysed. However, it is likely that this is impacting the number of people accessing the FHL there was an observed increase in people accessing the FHL in the months following the announcement in May 2024.

#### Annexes

Annex 1: First Home Loan Income Cap Adjustment Chronology



# **Annex A: First Home Loan Income Cap Adjustment Chronology**

The following table outlines all FHL income cap adjustments since its inception.

DATE	ADJUSTMENT	NOTES
September 2003	Home Ownership Mortgage Insurance Scheme (MIS) pilot is introduced and sets income caps at \$50,000 for an individual buyer, or up to \$100,000 if there are more than two main sources of household income and they are all co-borrowers on the loan.	People who would not usually be able to access a home loan because they had an insufficient deposit or did not meet bank lending criteria could apply for an 'In Reach Loan' from KiwiBank under the MIS pilot.
July 2005	MIS is extended and income caps are set at \$85,000 annual income for a household with one or two borrowers and \$120,000 for households with three or more borrowers.  The scheme enabled people modest incomes who were outside standard lending or to get a home loan with little deposit and reflected increase housing costs since the programme inception.	
September 2006	Welcome Home Loan (WHL) introduced to replace the MIS and sustains income caps of one or two people earning up to \$85,000 per annum, or three or more people earning up to a total of \$120,000 per annum.	The increase in lower quartile house prices had effectively hindered the scheme's usefulness. Adjustment was made to combat this.
October 2013	Income limits were set at \$80,000 for a single person and \$120,000 for two or more buyers.	The change in income limits was introduced in conjunction with criteria changes for the KiwiSaver Deposit Subsidy and sought to streamline programmes.  This change expected to triple the uptake of the WHL from 845 to 2,500 per year as the previous



		income caps were seen as unrealistic, particularly in Auckland.
August 2016 WHL income caps were increased from \$80,000 to \$85,000 for a single person and from \$120,000 to \$130,000 for a couple.		The change in income limits to the WHL was introduced in conjunction with changes to the KiwiSaver HomeStart Scheme (introduced in 2015) to reflect the ongoing increases in the national median house price.
October 2019	First Home Loan (FHL) introduced, and income caps maintained at \$85,000 for individual buyers and \$130,000 for two or more buyers.	Introduction of the FHL was a rebranding of the WHL and was announced as part of the Government's KiwiBuild reset.
April 2021	The income caps were increased from \$85,000 to \$95,000 for individual buyers and from \$130,000 to \$150,000 for two or more buyers.	The caps were increased to reflect the increased cost of housing and to encourage uptake.
May 2022	A new income cap category was introduced for an individual buyer with one or more dependants, with the following caps applied:  individual buyer - \$95,000;  individual buyer with one or more dependants - \$150,000; and  two or more buyers - \$150,000 (regardless of the number of dependants).	The caps were adjusted to more accurately reflect the population accessing homeownership.



## Aide mémoire

ACCESS TO KĀINGA ORA VACANT LAND BY COMMUNITY HOUSING PROVIDERS				
To Minister	Hon Chris Bishop Portfolio Housing			
CC Minister		Portfolio		
Date	7 April 2025	Priority	High	
Tracking number	HUD2025-006835			

CONTACT FOR DISCUSSION						
Name	Telephone	1st contact				
Adam Brown	GM, National Settings	s 9(2)(a)	✓			
Angela Burke	Angela Burke Manager, Delivery Strategy s 9(2)(a)					

OTHER AGENCIES CONSULTED	



#### **Purpose**

 To provide you with background information on potential options for divestment of Kāinga Ora land holdings to Community Housing Providers (CHPs), ahead of your meeting with the Kāinga Ora Chair Simon Moutter on Thursday 10 April 2025.

#### **Background**

- 2. You are meeting with Simon Moutter on Thursday, 10 April 2025, at 8.45am to discuss the turnaround plan progress update they provided you on 31 March 2025.
- 3. Although not on the agenda, the topic of divestment of vacant Kāinga Ora land holdings could be raised. If raised, it will likely include a discussion on options for divestment, including whether vacant Kāinga Ora land holdings should be divested to CHPs, and at what price.
- 4. This paper provides background information and a HUD perspective on this question.

#### Issues/Discussion

Kāinga Ora are identifying surplus land for divestment as part of the turnaround plan

- 5. As part of the turn-around plan, Kāinga Ora have been undertaking a review of current land holdings and paused projects with a view to selling surplus land that no longer meets their objectives. The aim is to reduce debt and provide opportunities for market-driven housing delivery.
- 6. We understand that Kāinga Ora are looking to phase divestment over several years, with a first tranche of divestment recently commenced.

CHPs in \$ 9(2)(i) have been encouraged to explore whether vacant Kāinga Ora sites could support social housing delivery

- 7. There have been initial discussions between HUD and Kāinga Ora, and the CHP sector on divestment opportunities in \$ 9(2)(i)
   8. \$ 9(2)(g)(i)
- 8. s 9(2)(g)(i)
- 9. To date, we are aware of one site in Rotorua s 9(2)(i)

for them to purchase the site and complete the development. There have been no discussions regarding sale price as disposal of the site is contingent upon the resolution of a contractual matter with the main contractor.



10. s 9(2)(i)

that could deliver around 80-90 social homes. It is understood that most of these sites have preliminary plans in place, but further work would be required to confirm the total yield and build ready status of these development opportunities.

11. Specific purchase price(s) have not been discussed, but final valuations will have an impact on CHPs ability to satisfy HUDs value for money requirements.

#### HUD's view is that Kāinga Ora divestment should proceed on a market basis

- 12. If vacant Kāinga Ora land is divested to CHPs, expectations on return (market vs sub-market) will be at the forefront of negotiations.
- 13. For Kāinga Ora, we expect their approach to start from a market basis, given their need to achieve greatest return and reduce debt. For CHPs, we expect project viability to be reliant on getting land at a discounted price, with a sub-market basis as their starting point.
- 14. HUD's view is that the starting point for Kāinga Ora divestment of vacant land should proceed on a market basis, as this:
  - a. aligns with Government expectations for Kāinga Ora to reduce debt
  - avoids additional subsidy to CHPs and an expectation for future IRRS funding without considering where future investment is needed.
- 15. Due to the timeframes involved, the ability of CHPs to purchase vacant Kāinga Ora land and then construct and deliver social homes by June 2027 would also be limited. s 9(2)(i)
- 16. Notwithstanding the above, under current delegations, the Kāinga Ora Board has authority to sell below market value. As this would impact their deficit, they are unlikely to proceed with this option without testing it with responsible Ministers first.
- 17. The other option for a sub-market approach is for Kāinga Ora to seek an appropriation from HUD to address the difference between market value and sale value from the CHP. However, HUD does not have a facility to do this without Cabinet (and The Treasury) approval.

s 9(2)(	(f)(iv)				
	s 9(2)(f)(	iv)			
	s 9(2)(f)(	iv)			



#### **Next steps**

- 20. HUD will continue to work with partners in \$ 9(2)(i) on the delivery of social housing places and provide you with an update if access to Kāinga Ora sites becomes a barrier to delivery.
- 21. If Kāinga Ora consider sub-market sales to CHPs, we expect this to be done on a case-by-case basis and that they would notify you first.



## **Briefing**

INITIAL ADVICE AND SCOPE ON EARLY INTERVENTIONS TO PREVENT THE NEED FOR EMERGENCY HOUSING						
To Minister	Hon Tama Potaka Portfolio Associate Minister of Housing					
CC Minister	CC Minister Hon Chris Bishop Portfolio Minister of Housing					
Date	11/04/2025 Priority Routine					
Tracking number	HUD2025-006630					

ACTION SOUGHT		
Action sought	Note that this briefing provides you with information on early interventions and opportunities to reduce demand for emergency housing.  Agree that HUD will work with other agencies to identify operational and process opportunities to improve early intervention initiatives.  Note you may wish to discuss this proposed approach with relevant Ministerial portfolios.	

CONTACT FOR DISCUSSION			
Name	Position	Telephone	1st contact
Laura Miller	Policy Manager (Responding to Severe Housing Needs)	s 9(2)(a)	✓
s 9(2)(a)	Senior Advisor (Responding to Severe Housing Needs)		

#### OTHER AGENCIES CONSULTED

Ara Poutama Aotearoa - Department of Corrections, Oranga Tamariki, Ministry of Health, Te Whatu Ora - Health New Zealand, Whaikaha - Ministry of Disabled People, Kāinga Ora, Ministry of Social Development, Social Investment Agency, Police, Te Puni Kōkiri, Ministry for Women, Ministry for Pacific Peoples, Te Puna Aonui, Ministry of Justice, and the Ministry of Education.



REC	RECOMMENDED ACTIONS			
It is r	It is recommended that you:			
1.	<b>Note</b> the early interventions workstream is part of the Emergency Housing Target 8 focus area aimed at reducing demand for emergency housing and ensuring it is only used when necessary.	Noted		
2.	<b>Note</b> that while a range of initiatives already exist, there are some issues with the way these are delivered which limit their effectiveness.	Noted		
3.	Agree that HUD focus work on operational and process improvements to current initiatives that could be advanced in the short-medium term to reduce the need for emergency housing.	Agree/Disagree		
4.	s 9(2)(f)(iv)	Noted		
5.	Agree to engage with your Ministerial colleagues regarding their endorsement for the proposed approach, starting with:	Agree/Disagree		
	<ul> <li>a. Minister of Corrections and Minister of Police: Hon Mark Mitchell;</li> </ul>			
	b. Associate Minister of Health: Hon Matt Doocey; and			
	c. Minister for Children and Minister for the Prevention of Family and Sexual Violence: Hon Karen Chhour.			

Laura Miller
Policy Manager,
Responding to Severe
Housing Needs
11 / 04 / 2025

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Hon Tama Potaka
Associate Minister of
Housing

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#### **Purpose**

- This paper provides you with an update on Phase Two of the early interventions workstream under the Emergency Housing Target 8 delivery plan.
- 2. The paper also seeks your agreement to focus work on operational and process improvements to current initiatives that could be advanced in the short-medium term.

#### **Executive summary**

- 3. Responsibility for the early intervention workstream is shared between the Ministry of Housing and Urban Development (HUD) and the Ministry of Social Development (MSD). Early intervention to reduce the need for EH will likely also support maintaining the EH target and support other government targets.
- 4. Early intervention refers to policies, practices, interventions and supports targeted towards people displaying evidence of imminent or potential risk of homelessness.
- 5. Responsibility for policies and initiatives which directly and indirectly promote housing stability are spread across several agencies, with support from community providers. While a range of initiatives already exist, there are issues with the way these are delivered which limit their effectiveness.
- 6. For early intervention measures to be effective it is important that the full range of a person's needs are considered and the responses to those needs are coordinated and connected. Isolated interventions will have limited effectiveness, and it becomes more likely crisis responses are required.
- 7. We recommend exploration of a coordinated combination of approaches to improve early intervention and ensure people receive the right support at the right time to reduce the need for emergency housing.

#### **Background**

- 8. The early interventions workstream is part of the Emergency Housing Target 8 focus area aimed at reducing demand for emergency housing and ensuring it is only used when necessary.
- 9. The EH target was achieved in early 2025. A focus on preventing the need for EH is crucial for sustaining Target 8 outcomes.
- 10. Māori have remained overrepresented in EH. Providing early interventions that are effective for Māori is important to support the reduction of these inequitable outcomes.
- 11. Phase one of the early interventions workstream was led by the Ministry of Social Development (MSD), which considered interventions within MSD's housing processes. MSD recommended that phase one not be progressed further at this time. [MSD REP/24/11/1050 refers].



- 12. Phase two builds on phase one and is led by the Ministry of Housing and Urban Development (HUD) focusing on identifying system-level opportunities for intervention to prevent the need for EH, including potential synergies with other work programmes.
- 13. There are close connections with HUD work on improving transitions outcomes for people exiting state care and custody [HUD2024005759 refers] s 9(2)(f)(iv)
- 14. There is also strong alignment with Government targets for health (Target 1), crime (Targets 3 and 4), employment (Target 5), and education (Target 6), as well as aims around social investment, given links to prevention and potential to achieve cross sector outcomes.

#### Early intervention is critical for an enduring response to homelessness

- 15. For the purposes of this work we have defined early intervention as:1
  - a. Policies, practices, interventions and supports targeted towards people displaying evidence/indicators of imminent or potential risk of homelessness.
- 16. Early intervention is distinct from prevention and crisis responses. However, all three elements delivered in coordination are necessary for an effective and enduring response to homelessness.

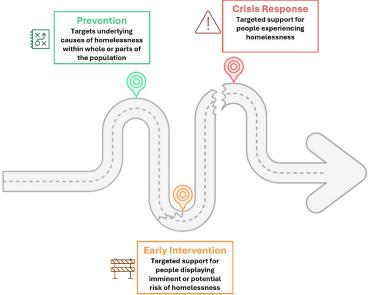


Diagram 1: Three elements of homelessness response

17. This definition is intended to be flexible to allow for consideration of other factors, such as prioritising interventions based on the degree of urgency in relation to intensity of

<sup>&</sup>lt;sup>1</sup> This definition has been informed by our review of international research and homelessness approaches. Please note, this definition may not reflect diverse perspectives of homelessness. For example, the Kāinga Kore Stage One Report (Wai 2750) outlined a lack of Māori involvement or representation in the definition of homelessness.



need. Please refer to **Annex A** for additional information on the definition of early intervention.

- 18. There is growing international evidence that suggests the costs in public funding to prevent homelessness are substantially less than the costs to respond once homelessness has occurred.<sup>2</sup> This is consistent with Government priorities to invest in earlier and better prevention to break cycles of dependence, intergenerational poverty, and disadvantage<sup>3</sup>.
- 19. Evidence also indicates earlier intervention is effective at reducing the impact on individuals through stopping the deterioration of health and wellbeing often associated with chronic homelessness.<sup>4</sup> This is reflected in the reduced intensity of intervention required at an earlier stage.

#### **Known interactions prior to emergency housing entry**

- 20. The need for EH is rarely caused by one isolated factor. Homelessness is driven by structural and system failures, such as poverty, supply and access to affordable housing, employment, health care. On an individual level, family breakdown, loss of employment or income, health conditions, and trauma such as family violence or other forms of victimisation are some of the many and complex causes of homelessness.
- 21. s 9(2)(f)(iv) that prior to entering EH, people have often had an increased level of interactions with government services, such as via acute hospitalisation, mental health and addiction services, and police proceedings.<sup>5</sup> While these factors may not necessarily reflect an actual need for housing, they do suggest potential opportunities for earlier intervention.

#### A cross-sectoral approach to early intervention

- 22. Effective early intervention requires a cross-sectoral approach, with action from the full range of agencies whose policies and initiatives impact on the need for EH support.

  Annex B outlines the importance of a connected, cross-sectoral approach.
- 23. Different outcomes are highly interconnected and dependant. For example, while access to healthcare and educational attainment can contribute to housing instability, housing instability is also known to increase the probability of poorer health and educational outcomes.
- 24. For early intervention measures to be effective it is important that the full range of a person's needs are considered and the responses to those needs are coordinated and

<sup>&</sup>lt;sup>2</sup> <u>Homelessness Prevention: Final Business and Regulatory Impact Assessment</u> (Scottish Government, October 2024).

<sup>&</sup>lt;sup>3</sup> Cabinet Paper: CAB-24-SUB-0140: Accelerating Social Investment (April 2024)

<sup>&</sup>lt;sup>4</sup> Research indicates that sleep rough reduces life expectancy by over 25 years (Auckland City Mission, 2024).

<sup>&</sup>lt;sup>5</sup>s 9(2)(f)(iv)



- connected. Isolated interventions will have limited effectiveness, and it becomes more likely crisis responses are required.
- 25. For example, as well as impacting on the need for EH, intervening earlier and at key trigger points in people's lives could also impact other government target areas such as efforts to address unemployment, student attendance, youth offending, and discharge from emergency departments.
- 26. From a social investment perspective, identifying opportunities to improve early intervention is critical to delivering more effective services.

#### There are a range of opportunities to improve early intervention

- 27. There are a number of initiatives and policies currently available that directly and indirectly promote housing stability and can be considered early interventions in terms of risk of needing EH. These are spread across a number of agencies, with support from community providers. Some examples of these are listed in **Annex C**.
- 28. However, through our work with agencies<sup>6</sup>, we have identified some general pain points in current systems:
  - a. Reluctance to engage: people may be reluctant to engage with the system for a number of reasons, including poor previous experiences of seeking help, and a fear of disclosing information to government.
  - b. *Difficulty navigating the system:* fragmentation and duplication of government supports make it hard for people to understand what support is available to them. For example, the support people receive can depend on where they enter the system, and how many times they are redirected to other agencies.
  - c. Ability of supports and services to meet needs: some initiatives may not be effective at achieving outcomes, which can result in people not receiving the support they need. This may be due to eligibility gaps and inconsistencies, delayed intervention points, unsustainable or time-limited funding (pilots), location availability, and cultural appropriateness. This may also be due to assumptions of need, contributing to over and underservicing.<sup>7</sup>
- 29. Working with agencies, we have also identified a number of specific points that indicate when certain groups may be at risk of needing EH in the future. These include:

Education. s 9(2)(f)(iv)

<sup>&</sup>lt;sup>6</sup> HUD has engaged with a wide range of agencies to inform this advice including Ara Poutama Aotearoa - Department of Corrections, Oranga Tamariki, Ministry of Health, Te Whatu Ora - Health New Zealand, Whaikaha - Ministry of Disabled People, Kāinga Ora, Ministry of Social Development, Social Investment Agency, Police, Te Puni Kōkiri, Ministry for Women, Ministry for Pacific Peoples, and Te Puna Aonui, Ministry of Justice, and the Ministry of Education



- a. Frequent emergency department use and/or acute hospitalisation;
- b. Chronic absence from school;
- Release from state care and custody;
- d. Family Violence incidences, application for Protection Orders and/or Police Safety Orders;
- e. Changes in employment and/or sudden drops in income, applications for welfare support such as Jobseeker Support, Sole Parent Support, Emergency Benefit, Youth Payment, Disability Support Services, and Housing Support Products;
- f. Child and youth offending, referrals to diversion and mentoring supports to reduce reoffending; and
- g. Referrals to mental health, substance abuse, and/or addiction services.

## We recommend a focus on improvements to operational processes and responses

30. s 9(2)(f)(iv)

Therefore, we recommend a focus on improvements to operational processes and responses which will have an impact in the short-medium term and are targeted at the above groups/points in time.

- 31. Key areas of focus for changes may include:
  - a. Improving navigation of systems and services: this could include identifying options for improved inter-agency collaboration, coordinated assessments and referrals, and guidance and navigation support.
  - b. Improving access to support and ensuring that support meets people's needs: this could include identifying options for operational improvements to current initiatives, improving points of intervention, determining whether initiatives are aligning with policy intent, and considering potential eligibility gaps.
- 32. Identifying and enacting specific operational improvements will require work across multiple government agencies and require support from a number of different Ministerial portfolios. We recommend engaging with your Ministerial colleagues to discuss this work and to gain their buy-in to this approach. We will provide further information to support these engagements. Please refer to **Annex D** for a potential engagement approach. The key Ministers we recommend you begin engagement with are:
  - a. Minister of Corrections and Minister of Police: Hon Mark Mitchell:
  - Associate Minister of Health: Hon Matt Doocey; and



- c. Minister for Children and Minister for the Prevention of Family and Sexual Violence: Hon Karen Chhour.
- 33. These Ministers are also key within the work to improve transitions [HUD2024-005759 refers], therefore you may want to look to schedule meetings that cover both areas of work and are timed for once you receive the next advice on transitions in mid-May.
- 34. This overall approach also aligns with Crown acknowledgements made during the Wai 2750 kaupapa inquiry on the need to improve coordination and information sharing between agencies and providers.

#### **Risks**

- 35. Without work on early intervention there is a risk of continued pressure on wider government services. There is also a risk that demand for EH could increase, potentially impacting on the sustainability of Target 8 outcomes. There may also be potential connected risks to the delivery and efficacy of wider government target efforts to address unemployment, student attendance, youth offending and reducing violent crime, and discharge from emergency departments.
- 36. There is a risk that agencies may have limited capacity or have other priorities that impact on their ability to undertake work in the early intervention space. We have suggested you discuss the work with Ministerial colleagues to test appetite for operational improvements relating to the navigation of, and access, to current initiatives.
- 37. Māori remain overrepresented in homelessness statistics and particularly in EH (65%). The work to identify and make operational improvements to navigation and access to existing initiatives will need to consider the impact on outcomes for Māori in the context of the Wai2750 kaupapa inquiry which found that the Crown had breached the principle of equity through the growing representation of Māori with unmet housing need.
- 38. Information on people in EH is not disaggregated by disability. This means we are not able to understand the specific needs of disabled people, or develop well-tailored/targeted solutions.

#### Consultation

39. Consultation has been undertaken with the following agencies: Ara Poutama Aotearoa - Department of Corrections, Oranga Tamariki, Ministry of Health, Te Whatu Ora - Health New Zealand, Whaikaha - Ministry of Disabled People, Kāinga Ora, Ministry of Social Development, Social Investment Agency, Police, Te Puni Kōkiri, Ministry for Women, Ministry for Pacific Peoples, Te Puna Aonui, Ministry of Justice, and the Ministry of Education.



#### **Next steps**

- 40. Subject to your agreement, we will work with other agencies to identify operational and process opportunities to improve early intervention initiatives which reduce the need for EH, which could be prioritised.
- 41. We will report back to you on proposed options for improvements to operational practices and processes in the second half of this year.

#### **Annexes**

Annex A: Defining early intervention in the context of addressing emergency housing demand

Annex B: A framework to support a system approach to early intervention

Annex C: Examples of agency initiatives

Annex D: Ministerial engagement



## Annex A: Defining early intervention in the context of addressing emergency housing demand

#### Elements of a comprehensive response to homelessness

Our proposed definition of early intervention has been informed by international best practice, which identifies four distinct elements in a comprehensive response to homelessness.

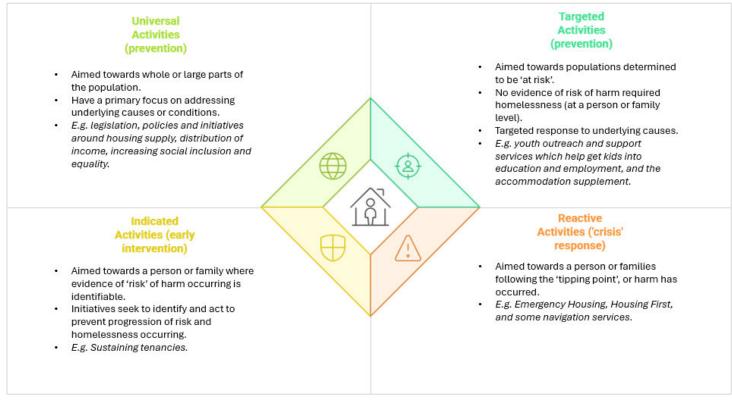


Diagram 2: Overview of prevention, early intervention, and reactive responses



## Annex B: A framework to support a system approach to early intervention

#### **Determinants**

Broader systemic factors controlled by Government that influence housing instability over time.

E.g. policy direction on who housing supports are for, urban planning and infrastructure, employment regulations, educational opportunities, colonisation causing cultural disconnection.

#### **Drivers**

A force or influence that actively contributes to housing instability and is dictated by determinants but often not directly controlled by Government.

E.g. Housing supply shortages, cost of living relative to wages, educational attainment.

#### **Risk Factors**

Circumstances or characteristics experienced by whānau, which increase the likelihood of housing instability.

E.g. Conviction history, disability, mental illness, addiction, substance abuse, low income, unemployment, cultural trauma.

### Protective Factors

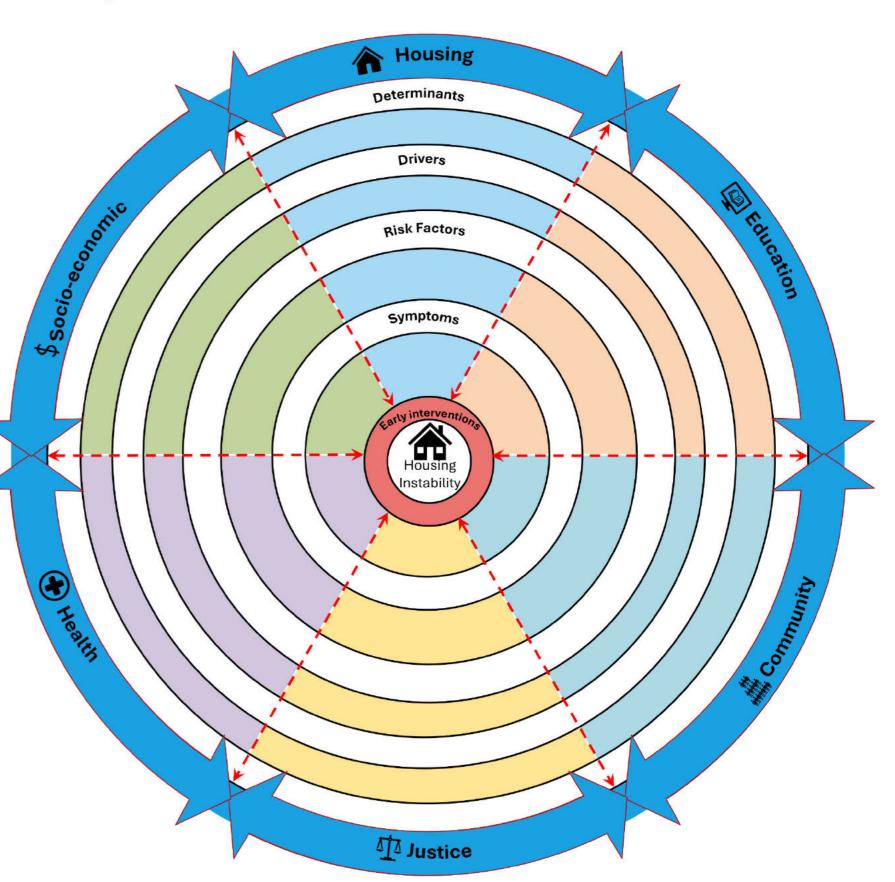
Characteristics or support that increase resilience, decreasing the likelihood of housing instability.

E.g. Rental assistance, income support, access to healthcare, and services, whānau centred approaches.

### Symptoms

The visible effect of the result of a person's risk and protective factors, indicating risk of housing instability.

E.g. application for multiple welfare supports, frequent relocation, high rent burden, frequent acute hospitalisations, low student attendance, child and youth offending.





## **Annex C: Examples of agency initiatives**

The tables below provide some examples of initiatives which directly and indirectly promote housing stability and could be considered an early intervention. Also, please note that some of these risk factors may sit across multiple domains and agencies, such as family violence and sexual violence.

Direct			
Support to access housing	Support to maintain housing	Support to transition from state care and custody	
<ul> <li>Social Housing (HUD, Kāinga Ora, MSD)</li> <li>Transitional Housing (HUD)</li> <li>Youth Transitional Housing (HUD)</li> <li>Young Parent Homes (OT)</li> <li>Community Group Housing (Kāinga Ora, HUD, MSD, OT, Health, Corrections, Whaikaha)</li> <li>Housing Support Products (MSD)</li> <li>Housing Support Services (MSD)</li> <li>Whai Kāinga Whai Oranga (TPK, HUD)</li> </ul>	<ul> <li>Sustaining Tenancies (HUD)</li> <li>Accommodation Supplement (MSD)</li> <li>Housing Support Products (MSD)</li> <li>Youth Benefit (MSD)</li> <li>Rates Rebates (DIA)</li> <li>Pacific Health Homes Initiative (MPP)</li> <li>Māori Housing Network (TPK)</li> <li>Healthy Homes (MBIE)</li> <li>Tenancy Services (MBIE)</li> </ul>	<ul> <li>Transition Support Services – Supported Accommodation (OT)</li> <li>Prison reintegration programme (Corrections)</li> <li>Youth Service (MSD)</li> <li>Rāpua Te Āhuru Mōwai pilots (Health)</li> </ul>	

Indirect			
Sector	Risk Factor	Protective Factors – Agency Initiatives	
Socio-	Income instability	Supported living payment (MSD)	
economic	<ul> <li>Disability allowance (MSD)</li> <li>Re-establishment special needs grants (MSD)</li> </ul>		
		Sole parent support (MSD)	
		Temporary additional support (MSD)	

		Family boost (IRD)
		Best start payments (IRD)
		Working for families payments (IRD)
		Jobseeker support (MSD)
	Unemployment	Childcare subsidy (MSD)
		• OSCAR funding (MSD)
	Discrimination	Gender pay gap toolkit (Manatū Wāhine)
		Te Mahere Whai Mahi Wāhine – Women's Employment Action Plan (Manatū Wāhine)
		Paiheretia te Muka Tāngata
	Disability	Disability Support Services (MSD)
Health	Mental illness	Integrated health services and outreach (Health)
		Mobile health services (Health)
	Substance abuse / addiction	Amohia te Waiora – Minimise alcohol related harm (Health)
Community	Inability to connect to cultural identity, belonging	Māori Development Fund (TPK)
	Cultural competency of services and providers	Ngā Tini Whetū (TPK, ACC)
		<ul> <li>Paiheretia te Muka Tāngata (TPK, Corrections, MSD)</li> </ul>
Education	Low educational attainment	Supports to encourage school attendance (MoE)
	Poor educational outcomes	• 20 hours free ECE (MoE)
		Poipoia te Mokopuna (MoE)
		<ul> <li>Ka Ora, Ka Ako school lunches (MoE)</li> </ul>
Justice	Stigma and discrimination	Awhi app (Police)
	History of state care or custody	Adult diversion scheme (Police)
		Fresh Start (OT)
		Transition Support Services (OT)
		Paiheretia te Muka Tāngata (TPK)
	Community insecurity	Awhi app (Police)
		<ul> <li>Neighbourhood policing teams (Police)</li> </ul>
		Co-response team (Police)
	Family Violence and Sexual Violence	Protection Orders (Family Court - Justice)
		Housing Family Violence Perpetrator Support Services Housing (MSD)
		Safety and Non-Violence Programmes (Justice)
		Women's Refuge (MSD, HUD)



## **Annex D: Ministerial engagement**

We recommend you begin engagement with the below Ministers:

MINISTER	PORTFOLIO(S)	POTENTIAL INTERVENTION INDICATOR(S)
Minister of Corrections and Minister of Police: Hon Mark Mitchell	Police and Corrections	Release from state care and custody;
Associate Minister of Health: Hon Matt Doocey	Mental health	Referrals to mental health, substance abuse, and/or addiction services
Minister for Children and Minister for the Prevention of Family and Sexual Violence: Hon Karen Chhour	Children and Family and sexual violence	Release from state care and custody  Application for Protection Orders and/or Police Safety Orders

You may also wish to consider engaging with the following Ministers:

MINISTER	PORTFOLIO(S)	POTENTIAL INTERVENTION INDICATOR(S)
Minister of Health: Hon Simeon Brown	Health	Frequent emergency department use and/or acute hospitalisation
Minister of Justice: Hon Paul Goldsmith	Justice	Child and youth offending, referrals to diversion and mentoring supports to reduce reoffending
Minister for Social Development and Employment, and Minister for Disability Issues: Hon Louise Upston	Social Development and Disability	Application for benefits, such as Jobseeker Support, Sole Parent Support, Emergency Benefit, Youth Payment, Disability Support Services, and Housing Support Products;
Associate Minister of Education: Hon David Seymour	School Attendance	Chronic absence from school