

22 May 2025

HUD2025-007031

s 9(2)(a)		

Tēnā koe s 9(2)(a)

On 05 May 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):

a copy of the advice provided by HUD to Minister Potaka on 24 April on phase two of emergency housing early interventions.

One document has been found to be within scope of your request and is released to you. 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.

The document is detailed in the attached document schedule.

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

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Laura Miller Policy Manager, Responding to Severe Housing Needs

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

Annex A: Document schedule

	Documents released – [HUD2025-007031]		
	Date	Document	Section of the Act applied
1		HUD2025-006630 - Initial advice and scope on early interventions to prevent the need for emergency housing	9(2)(a), 9(2)(f)(iv)



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	Hon Chris Bishop	Portfolio	Minister of Housing
Date	11/04/2025PriorityRoutine		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.



RECO	RECOMMENDED ACTIONS				
It is re	It is recommended that you:				
1.	Note 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.	Note 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			
	 Minister of Corrections and Minister of Police: Hon Mark Mitchell; 				
	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.				

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Laura Miller Policy Manager, Responding to Severe Housing Needs 11 / 04 / 2025 Hon Tama Potaka Associate Minister of Housing / /



Purpose

- 1. 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

- 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.
- 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.
- 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.
- 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)
 , with further advice due in May s 9(2)(f)(iv)

2025 respectively.

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

¹ 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.² This is consistent with Government priorities to invest in earlier and better prevention to break cycles of dependence, intergenerational poverty, and disadvantage³.
- 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.⁴ 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.⁵ 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

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

³ Cabinet Paper: <u>CAB-24-SUB-0140</u>: Accelerating Social Investment (April 2024)

⁴ Research indicates that sleep rough reduces life expectancy by over 25 years (Auckland City Mission, 2024).

⁵s 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 agencies⁶, 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.⁷
- 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:

⁶ 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;
- c. 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;
 - 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.
- 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 welltailored/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





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

Indirect		
Sector	Risk Factor	Protective Factors – Agency Initiatives
Socio- economic	Income instability	 Supported living payment (MSD) Disability allowance (MSD) Re-establishment special needs grants (MSD) 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) Deihenetis te Multe Tānuete
	Disability	Paiheretia te Muka Tāngata Disabilitu Support Services (MSD)
Health	Mental illness	Disability Support Services (MSD)
Health		Integrated health services and outreach (Health) Mabile health services (Health)
	Substance abuse / addiction	Mobile health services (Health)
O a management it a		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)
		Paiheretia te Muka Tāngata (TPK, Corrections, MSD)
Education	Low educational attainment	Supports to encourage school attendance (MoE)
	Poor educational outcomes	• 20 hours free ECE (MoE)
		Poipoia te Mokopuna (MoE)
31 257		Ka Ora, Ka Ako school lunches (MoE)
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)
		 Neighbourhood policing teams (Police)
		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