



ACOSS Submission | June 2008

Australian  
Council of  
**Social Service**

## **Submission to 'Which Way Home?: A new approach to homelessness'**

ACOSS, June 2008

## Executive summary

The Australian Council of Social Service (ACOSS) welcomes this opportunity to respond to the Green Paper on Homelessness, *Which Way Home? A new approach to homelessness* ('the Green Paper'). ACOSS is very pleased that the issue of homelessness has been recognised as a national priority and welcomes the Government's commitment to improving the policy and service system response to homelessness.

ACOSS is the peak council of the community services and welfare sector and the national voice for the needs of people affected by poverty, disadvantage and inequality. It is clear that poverty and disadvantage are key structural causes of homelessness and that those who are homeless experience acute poverty and social exclusion. ACOSS is concerned to ensure that any new response to homelessness seeks to address both the structural and individual causes of homelessness, while at the same time enhancing the crisis response service system and expanding supported pathways out of homelessness.

ACOSS released research last year which showed that an estimated 2,210,000 people or 11.1% of Australians, including 412,000 children, lived below the poverty line.<sup>1</sup> These Australians are currently excluded from the benefits of national prosperity, missing out on adequate housing, education and health care and excluded from the employment market. ACOSS has consistently advocated that a coordinated response to disadvantage is required in order to achieve the goals of a fairer and more equitable society. We support the development of a social inclusion strategy which addresses not only poverty, but all aspects of social exclusion. Responding to homelessness should be a part of this strategy.

Lack of access to affordable, secure housing is the primary structural cause of homelessness.<sup>2</sup> Responding to the crisis in housing affordability by increasing the stock of social housing and affordable rental properties must form a core part of an improved national response to homelessness. ACOSS has welcomed the Government's commitment to a suite of housing affordability measures, including the National Rental Affordability Scheme, the Housing Affordability Fund, the Housing Research and Supply Council and funding for 600 homes for those experiencing homelessness under the 'A Place to Call Home' strategy. However, without a significant increase in the stock of public and community housing, the housing needs of the most disadvantaged Australians will not be met. We have therefore called for an increase in the stock of public and community housing as a key element in our proposed national response to homelessness.

The proposed national response to homelessness is to be developed within a broader national reform agenda. This agenda seeks a reduction in the number of Specific Purpose Payments (SPPs) from 88 down to five. The National Affordable Housing Agreement is to represent one of the five funding frameworks. This agreement will include the Government's various housing affordability measures (the National Rental Affordability Scheme, the Housing Affordability Fund, the Housing Research and Supply Council etc) as well as funding for public and community housing and homelessness. It is not clear how the

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<sup>1</sup> Australian Council of Social Service, *Australia Fair: Update on those missing out – The numbers and stories of those missing out*, 2007.

<sup>2</sup> Erebus Consulting Partners, *National Evaluation of the Supported Accommodation Assistance Program (SAAP IV)*, Final Report, May 2004 (SAAP IV Evaluation Report) at 139.

homelessness funding is to be allocated. Importantly, the Government has indicated that there will be no reduction in current funding for housing. However, it has not given assurances about the level of funding for specific components of housing and homelessness funding (for example, for current Supported Accommodation and Assistance Program (SAAP) providers or public and community housing).

ACOSS welcomes some key aspects of the Green Paper which offer real potential for positive change in the delivery of services to those experiencing or at risk of homelessness. In particular, we support the emphasis on prevention and early intervention, wrap-around services, joined-up service delivery, the setting of goals and targets, a housing plus support model, homelessness sector workforce development and improved data collection.

In this submission we address key themes emerging from the Green Paper under the following headings:

- defining and measuring homelessness;
- core principles of a new homelessness response;
- examining the causes of homelessness;
- building on existing strengths;
- some comments on the proposed options; and
- key elements of a proposed fourth option.

The ACOSS response draws upon the submissions of a number of other organisations as well as discussions with the housing and homelessness sector. ACOSS broadly supports the general direction of the Homelessness Australia submission and recognises the important role that they have played in bringing the sector together to discuss the Green Paper.

As a starting point, we emphasise that data collection around homelessness needs to be improved in light of the limitations of existing data which is thought to significantly underestimate the level of homelessness in Australia. Caution should be exercised in relying on existing data in the development of policy approaches and funding levels.

ACOSS broadly supports the general principles outlined in the Green Paper, however we raise a number of concerns in relation to several principles and propose some additional principles which should inform any response. The key themes emerging from this analysis are that human rights principles should underpin the national response to homelessness, and that the characterisation of access to housing as a basic right has important policy implications. In particular, this approach suggests the inappropriateness of policy proposals which would make access to accommodation conditional upon certain kinds of conduct (for example, participation in education and training). A human rights approach which prohibited discrimination on the basis of homelessness or socio-economic status would also enshrine the responsibilities of public services to provide assistance on a universal, non-discriminatory basis.

In developing an effective response to homelessness the structural and individual causes of homelessness must be understood as well as the complex interaction between them. Targeting the structural or systemic factors is essential in preventing homelessness, given the correlations between socio-economic disadvantage and the other social and individual issues that individuals may experience. For this reason, ACOSS submits that a new response to homelessness, which most effectively invests in prevention and early

intervention, must examine the interactions between existing structures and policy settings, and their impact on homelessness. In particular, this must include a review of social security law and policy, affordable housing policies and funding and a review of the impact of the criminal justice system and mental health systems on homelessness.

A new homelessness White Paper must build on the strengths of existing homelessness services. The successes of the SAAP program have been highlighted in successive evaluations. Its capacity to play a core role in linking clients to mainstream services and providing case management services must be recognised and further resources allocated to support this role. Further, the barriers it faces in achieving long term outcomes for those experiencing homelessness must be acknowledged and addressed.

Turning to the three options for reform proposed in the Green Paper, ACOSS is concerned that none of the proposed options would effectively achieve the complementary goals of strengthening homelessness services and enhancing the mainstream service system response to prevent homelessness, intervene early and expand exit options. More specifically, we identify a number of risks and limitations of each option.

Option One, which would structure services around population based service delivery streams, increases the potential risk of people falling between gaps in services and thus not having their needs appropriately met. It is likely to be a slow and disruptive reform process and assumes the ability of mainstream service systems to respond appropriately to those experiencing or at risk of homelessness. Option Two, although a necessary part of any new response, is inadequate in the absence of mainstream service system improvements and an expansion in funding for public and community housing. Option Three, by contrast, proposes the enhancement of mainstream services as an alternative to an expansion in the role of SAAP providers, while limiting SAAP's role to crisis accommodation. This fails to recognise the unique strengths and capacities of the those organisations delivering services under the SAAP program, their role in linking clients to other services, the greater effectiveness of longer support periods in achieving sustained outcomes and the mainstream service system's lack of capacity and experience in providing services to those who are homeless.

In light of the deficiencies of these three options, ACOSS proposes an alternative fourth option comprised of five key elements:

1. An increase in the stock of public, community and other affordable housing;
2. A National Strategy with goals and targets;
3. A new National Affordable Housing Agreement which includes housing and homelessness funding programs;
4. The enhancement of effective prevention and early intervention programs; and
5. The enhancement of homelessness support services to meet existing need, provide longer term and post-crisis support and to increase case management and service brokering capacity.

## Defining and measuring homelessness

The Green Paper relies on 2001 census data to measure the extent of homelessness in Australia, citing the figure of 100,000 people homeless on any night, including approximately 50,000 who are under 25 and 10,000 who are children. It is important to acknowledge the limitations of this data. Firstly, the figure is already 7 years old and may not capture significant changes in the homeless population since 2001. Secondly, there is a widely held view that the figure grossly under-represents the actual extent of the problem, due to the problems of locating and surveying those who are without secure and stable housing. As the Green Paper notes, the Census can only reveal how many people were homeless on Census night but cannot reveal the number of people who are homeless across a year nor for how long and how often they are homeless.<sup>3</sup> By contrast, the SAAP data only reveals information about those who seek the assistance of crisis accommodation providers. The 100,000 figure must therefore be used with caution, and should not form the basis of funding formulae.

We are pleased that the Green Paper has adopted a broad definition of homelessness, which extends beyond 'rough sleeping' or primary homelessness (those without any conventional housing) and includes secondary homelessness (people who are staying with friends or relatives short term or are accommodated by SAAP) and tertiary homelessness (those living in boarding houses).<sup>4</sup> As discussed below, it is important that goals and targets on homelessness do not just relate specifically to small segments of the homeless population but measure outcomes for the broader homeless population.

## Core principles of a new homelessness response

ACOSS welcomes some key aspects of the Green Paper which offer real potential for positive change in the delivery of services to those experiencing or at risk of homelessness. In particular, we support the emphasis on prevention and early intervention, wrap-around services, joined-up service delivery, the setting of goals and targets, a housing plus support model, homelessness sector workforce development and improved data collection.

The Green Paper proposes ten key principles to guide the development of a new approach. These are stated as follows:

1. A national commitment and strong leadership from all levels of government, the not-for-profit and business sectors and the general community is needed.
2. Preventing the causes of homelessness is a main focus.
3. Social inclusion drives our efforts.
4. Everyone is treated with dignity and respect.
5. Safety and wellbeing are a prime concern for all clients.
6. Rights and responsibilities of individuals and families are paramount.
7. Joined-up service delivery needs joined up-policy.
8. Transition points are a priority.

<sup>3</sup> Commonwealth of Australia, *Which Way Home? – A new approach to homelessness*, May 2008 (Green Paper) at 12.

<sup>4</sup> ABS operational categories of homelessness.

9. Evidence-based policy helps to shape our priorities for action.
10. Targets are set to reduce homelessness and build government and community accountability.

ACOSS generally supports these principles as the basis of a new approach to homelessness. However, we wish to make some additional comments about the implications and potential application of four of these principles as well as suggesting three additional principles.

***Principle 1: That a national commitment and strong leadership from all levels of government, the not-for-profit and business sectors and the general community is needed.***

ACOSS strongly welcomes the development of a national approach that embraces all levels of Government, extends across agencies and departments and involves the non-government and business sectors. Further detail is required as to how the national approach will be coordinated in light of some significant state and territory differences in the administration of homelessness programs. We believe that a national commitment should be expressed in a national homelessness strategy which includes the following elements suggested by the SAAP IV evaluation report:

- it should aim at delivering the vision of substantially reducing or eliminating homelessness over time;
- it should be nationally led, but with a joint partnership between all levels of government;
- funding should be through tied grants specifically targeting homelessness, contributed to jointly by the Australian and State and Territory Governments;
- it would recognise the human rights of homeless people;
- it would include targets for the reduction of homelessness;
- it would have strategies to address each of the causes of homelessness and clearly linked to other strategies targeting, for example, mental health, employment, and education and training; and
- it would have strategies in place to increase access to affordable housing, including ways to decrease the waiting list for public housing.<sup>5</sup>

***Principle 2: Preventing the causes of homelessness is a main focus - Appropriately funded programs can divert people into secure and affordable housing. Early intervention support mechanisms need to be part of the homelessness service system within the broader community.***

ACOSS believes that this principle needs to be expanded to ensure that it captures both the structural and individual causes of homelessness. Structural causes include poverty, unemployment, housing availability, discrimination, family violence, income inequality, educational and employment opportunities and Indigenous disadvantage. The SAAP IV evaluation report states that it would appear that the single most influential structural cause relates to the lack of affordable and sustainable long term housing.<sup>6</sup>

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<sup>5</sup> SAAP IV Evaluation Report at pg 202.

<sup>6</sup> SAAP IV Evaluation Report at pg 139.

***Principle 6: Rights and responsibilities of individuals and families are paramount - Assistance should be balanced to reflect the social and economic objectives appropriate to age, capacity and aspirations.***

ACOSS suggests that there should be some limits to a 'rights and responsibilities' framework in the context of homelessness. In our view, the acute vulnerability of those experiencing homelessness and the crisis situation in which they have found themselves means that the first and immediate priority should be supporting people to resolve the immediate crisis situation, build self-reliance and help re-create stability in people's lives. This is consistent with the focus in principle 3 on 'building human capacity'. Given the complex nature of the issues which many people experiencing homelessness are likely to be affected by – poverty, poor education, unemployment, mental illness, family violence and drug and alcohol problems – making access to basic support contingent on a person's behaviour or their participation in education or work seems unreasonable. We further develop this position below under our discussion of housing as a basic human right. At this stage, however, it is important to note the findings in the most recent SAAP evaluation report, that there has been an international trend *away from* the imposition of rules and boundaries upon accommodation *towards* non-conditional or 'low barrier' housing 'to untie eligibility for housing with consent to treatment or low/no barrier housing'. The Report stated that:

The objective of increasing choice and reducing conditional access points (i.e. those services which are offered only in conjunction with others or place requirements on the client) is to reduce the reliance of homeless people on marginal housing situations.<sup>7</sup>

Given this international trend, it is unclear why a shift towards a 'rights and responsibilities' framework is suggested in the Green Paper without a supporting evidence base. Indeed, the SAAP IV Report highlights a research finding that homeless people need to be provided with a *choice* of housing and whether to accept it or not.<sup>8</sup>

We acknowledge that crisis accommodation providers have developed certain rules relating to the conduct of clients, such that, for example, clients with aggressive or violent behaviour may be evicted from accommodation to protect staff and other clients from harm. ACOSS does not suggest that these rules are not reasonable. Rather, we believe that they highlight the need for appropriate specialist services with multi-disciplinary staff teams to meet the needs of people with high and complex needs or challenging behaviours.

ACOSS understands that people may be at particular risk of homelessness at key life transition points, and agrees that the service system should be designed such that it is able to provide appropriate support at these points. However, we would seek to ensure that, in addition to a recognition of individual factors which may lead to homelessness (such as at various life transitions) there is a systematic attempt to respond to the structural causes of homelessness, as identified above. This requires cross-agency, whole-of-government and cross-government planning (through COAG) to ensure that all service systems are oriented towards the prevention of homelessness and that exit options are expanded for those experiencing homelessness. This is particularly important in the context of the criminal

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<sup>7</sup> SAAP IV Evaluation Report at 63.

<sup>8</sup> SAAP IV Evaluation Report at 63.

justice system, the health and mental health system and the child protection system. ACOSS advocates for the inclusion of a joint government responsibility within the broad-banded SPPs to ensure that people are not 'discharged into homelessness', that is, released from prison or discharged from health facilities, without secure accommodation to go to. This proposal is discussed further below.

***Principle 7: Evidence-based policy helps to shape our priorities for action.***

Although ACOSS supports a commitment to the development of evidence-based policy, we wish to express a cautionary note about the nature of available evidence. For example, we understand that a core part of the role of SAAP providers is the provision of social and emotional support, the building of trust relationships and the giving of respect to clients. These aspects of SAAP's role, however, are not easily captured by data and are often under-recognised. It is therefore important that policy makers remain aware of aspects of service delivery that are not currently represented in the SAAP data (except, perhaps, indirectly in levels of satisfaction with staff etc) and seek to improve the collection of such qualitative data to enrich our understanding of the role and impact of homelessness service providers on all aspects of clients' lives.

**Some additional principles**

ACOSS suggests a number of additional principles which we believe should form the basis of any new approach to homelessness including:

- Housing is a basic human right;
- Public services have a responsibility to assist homeless people on a non-discriminatory basis; and
- A diverse and flexible service system is essential to meet the needs of a diverse homeless population.

***Housing is a basic human right***

ACOSS is pleased that principle 4, 'everyone is treated with dignity and respect', recognises the importance of protecting human dignity in our response to homelessness. However, ACOSS believes that there is considerable support for a broader human rights based approach to homelessness. Such an approach would recognise that access to safe and secure housing is one of our most basic rights, while also recognising the range of rights which are likely to be affected when someone is homeless including the right to adequate standard of living, the right to education, the right to liberty and security of person, the right to privacy, the right to social security, the right to freedom from discrimination and the right to vote.<sup>9</sup> Under the International Convention on Economic, Social and Cultural Rights (ICESCR), Australia has an obligation to progressively implement the right to adequate housing. In the report of the United Nations Special Rapporteur on adequate housing, he concluded that:

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<sup>9</sup> Human Rights and Equal Opportunity Commission, 'Homelessness is a Human Rights Issue', 2008, at 2.

Australia has failed to implement its international legal obligation to progressively realise the human right to adequate housing to the maximum of its available resources, particularly in view of its possibilities as a rich and prosperous country.<sup>10</sup>

The Special Rapporteur recommended the development of a comprehensive and coordinated housing policy which, among other things, embodies an overarching human rights approach.<sup>11</sup> This would have a number of significant implications. It would provide a framework for the strengthening of tenancy rights and complaint mechanisms, the prohibition of discrimination on the basis of homelessness or socio-economic status and protection from forced evictions<sup>12</sup> while setting out key elements of adequate housing against which progress could be measured. These include:

- Security of tenure;
- Access to public goods and services;
- Access to environmental goods and services (including land and water);
- Affordability (including access to finance);
- Habitability;
- Accessibility (physical);
- Location; and
- Cultural appropriateness.<sup>13</sup>

Given the core or basic nature of the right to housing, its fulfillment should require that accommodation be provided without conditions – that is, for example, without requirement that an individual engage in employment or training, as is suggested in the Green Paper. This is not to suggest that opportunities to engage in education and training should not be provided for people who are homeless, nor that people who can work should not be encouraged to do so, but that access to housing should not be contingent on such participation.

***Public services have a responsibility to assist people experiencing homelessness on a non-discriminatory basis***

ACOSS recognises that incentive systems for mainstream service systems with additional funding linked to the achievement of outcomes for homeless people, as is suggested in Option 3, might have the effect of improving the mainstream response to homelessness. However, it is important that the principles of non-discrimination and universal access underpin mainstream service delivery, such that any incentive scheme would be seeking to merely improve the service response, rather than compensate for a reluctance to serve clients who are very disadvantaged or have high and complex needs. This should be underpinned by legislation prohibiting discrimination on the basis of homelessness or socio-economic status, as part of a human rights approach to homelessness.

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<sup>10</sup> Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, Mission to Australia, 11 May 2007 at pg 32.

<sup>11</sup> Ibid at 32.

<sup>12</sup> Forced evictions are considered to be a gross human rights violation. See the Special Rapporteur report at 19, which noted that no Australian jurisdiction currently provides adequate compensation for those who are forcibly evicted or appropriate relocation when people are not in a position to secure alternative accommodation themselves.

<sup>13</sup> Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, Mission to Australia, 11 May 2007 at pg 19.

### ***A diverse and flexible service system is essential to meet the needs of those experiencing homelessness***

The SAAP IV Evaluation highlighted the particular benefits of both large and small homelessness services. It noted that smaller agencies may be able to offer more personalised attention while larger agencies may have the capacity to offer a more comprehensive range of services.<sup>14</sup> The diversity of the homeless population suggests that a diverse and flexible service system, which includes a mixture of large and small agencies, is required. In addition, ensuring that the needs of a diverse population can be met by the homeless service system must be one of the key principles of any new approach. This should include people with disabilities, including women who may be more vulnerable to domestic violence.

### **Examining the causes of homelessness**

The Green Paper identifies a number of 'socio-economic factors', 'social exclusion' factors and 'individual issues' that relate to the causes of homelessness.<sup>15</sup> It recognises the complex interplay of structural and individual causes that can result in homelessness, stating that '(t)he complexity and diversity of homelessness means that there are often many interacting and cumulative causes'.<sup>16</sup>

Significantly, 'socio-economic factors' include housing under-supply, unaffordable housing, unemployment, deinstitutionalisation, poverty, poor education, lack of coordination between agencies and discrimination by landlords.<sup>17</sup> These factors obviously have differential impacts in different parts of the country, with urban, regional, rural and remote areas raising particular issues. 'Social Inclusion' factors include domestic and family violence, sexual physical and emotional abuse, lack of social networks, high levels of family conflict and stress and low levels of social attachment.<sup>18</sup> Finally, 'individual issues' are defined to include alcoholism, substance abuse, mental illness, disability and criminality.<sup>19</sup>

While this classification scheme has some utility, it fails to capture the inter-dependence of structural or socio-economic factors and what are described as 'individual factors'. For example it does not adequately capture the complex causal relationships between socio-economic background, education levels and criminality. Without a sense of this interdependence, any attempt to address individual causes will fail. Targeting the structural or systemic factors is essential in preventing homelessness, given the correlations between socio-economic disadvantage and the other social and individual issues that individuals may experience. For this reason, ACROSS submits that an effective response to homelessness, which most effectively invests in prevention and early intervention, must examine the interactions between existing structures and policy settings, and their impact on homelessness. In particular, this must include a review of social security law and policy,

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<sup>14</sup> SAAP IV Evaluation Report at 150.

<sup>15</sup> These categories are derived from work done by the South Australian Social Inclusion Unit, Wilson, L. & Spoehr, J. (2003) *Towards a Predictive Model of Homelessness in South Australia*, Report 1, University of Adelaide and Australian Institute for Social Research.

<sup>16</sup> Green Paper at 20.

<sup>17</sup> Green Paper at 20.

<sup>18</sup> Green Paper at 20.

<sup>19</sup> Green Paper at 20.

affordable housing policies and funding and a review of the impact of the criminal justice system, mental health and other systems on homelessness. This will obviously require federal cooperation to coordinate the responses of States and Territories.

Lack of access to affordable housing is identified in the Green Paper as the major structural cause of homelessness. Due to worsening problems of housing affordability, more than three-quarters of a million lower income households are paying housing costs which exceed the commonly-used affordability benchmark of 30% of household income for households in the lowest 40% of income distribution. While many Australians are struggling with housing costs, the majority of those in housing stress are private renters. Vacancy rates have reached their lowest point in twenty years and rent is rising much faster than wages.<sup>20</sup> As a result of these factors, some 65% of private renters are currently experiencing housing stress.<sup>21</sup> Rising rent levels have also increased the pressure on public housing and crisis accommodation services and contributed to the current rate of homelessness. As noted above, increasing the stock of social and affordable housing must therefore form a key part of the new approach.

## Building on existing strengths

Any reform to the way that the issue of homelessness is addressed nationally must acknowledge the strengths and successes of the SAAP program. As the most recent National Evaluation Report found, every evaluation of SAAP has highlighted the following points (among others):

- 'SAAP is a good program and has successfully met its aims and objectives, that it is impressive in its achievements and that it has implemented reform and adopted many new approaches in response to the diversity of need';
- 'SAAP has long been more than the passive provision of a bed. Over time, it has developed into a program with good practice in case management and support of homeless people. Each report said that the majority of homeless people who used SAAP effectively had their needs met';
- 'SAAP services perform a difficult task, often under stress, with admirable commitment'; and
- 'Innovative models have been explored and developed and SAAP now provides a continuum of support which includes early intervention'.<sup>22</sup>

The SAAP Act provides that the overall aim of the SAAP program is to provide transitional supported accommodation and a range of related support services in order to help people who are homeless or at imminent risk of homelessness to achieve the maximum possible degree of self-reliance and independence. In reality, according to providers, SAAP provides accommodation and support, referral, advice and counselling, fills the gaps and engages in advocacy and case management.<sup>23</sup>

<sup>20</sup> Julian Disney, University of New South Wales, 'Election 2007: Affordable rental housing', *Australian Renew of Public Affairs*, September 2007, accessed at <http://www.australianreview.net/digest/2007/election/disney.html>.

<sup>21</sup> AHURI, 'Housing Affordability: a 21st century problem', National Research Venture 3: Housing Affordability for Lower Income Australians, by Judith Yates and Vivienne Milligan et al, September 2007 at 19.

<sup>22</sup> SAAP IV Evaluation Report at 4-5.

<sup>23</sup> Ibid at 98.

The SAAP IV Evaluation Report acknowledged the unique capacity of SAAP services to play a brokerage or linking role, stating that:

‘...the SAAP service provider is in the ideal position to take a leadership role in not only developing the client plan but also to facilitate and broker available services to the benefit of clients. At a practical level, it is the SAAP service provider that is generally the first point of contact of homeless people. Moreover the opportunity is then presented at the outset to begin to develop the trusting relationship with the client, which is the prerequisite for all future work with the client.’<sup>24</sup>

The Report also highlighted the effectiveness of case management approaches used by the SAAP sector, highlighting the need for all service providers to ‘receive adequate assistance and development so that this approach is the fundamental tool for delivering quality client outcomes.’<sup>25</sup>

The Green Paper highlights the failure of SAAP to significantly change employment outcomes for clients, referring to the SAAP IV Evaluation report which found that SAAP had little impact of employment, with no significant change in the number of clients receiving wages or a salary after SAAP support. However, SAAP did have a significant impact in assisting clients to obtain or maintain a pension or benefit with a 6% reduction in the number of people with no income or waiting for a benefit. This is testament to the important role SAAP can play in brokering and linking clients up with entitlements and services.<sup>26</sup> There must also be recognition of the short nature of many SAAP support periods and the complex issues affecting many SAAP clients, who are necessarily in a crisis situation, which may make immediate employment an unrealistic immediate objective.

Any discussion of the ‘failures’ of SAAP must acknowledge the enormous obstacles providers face in achieving long term outcomes for clients, most significantly resource limitations on the number of places available, the lack of capital input, staffing levels, staff skills, staff incomes, lack of outreach services, lack of complementary services in rural areas, lack of staff in child protection, drug and alcohol and mental health services and the lack of exit points.<sup>27</sup> These barriers are consistent with those identified by the authors of the SAAP IV Report, which states that:

SAAP’s aim to make its clients independent is impeded by the lack of affordable and appropriate housing as exit points from SAAP, the impact of high rates of unemployment and poverty, and the diversity of problems faced by SAAP clients including mental health and domestic violence.<sup>28</sup>

The vast majority of SAAP clients indicated that they needed ‘a place to live for some time’ rather than ‘just a bed for a night or two’.<sup>29</sup> Despite this, SAAP has still demonstrated some significant positive results in assisting clients to access secure housing, with a 6% increase in the number of clients in public and community housing after a SAAP support period, and

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<sup>24</sup> Ibid at 206.

<sup>25</sup> Ibid at 206.

<sup>26</sup> Ibid at 75.

<sup>27</sup> Ibid at 100.

<sup>28</sup> Ibid at 4-5.

<sup>29</sup> Ibid at 83.

a 6% decrease in the number of people living in a car, tent, park, street or squat.<sup>30</sup> For those who specifically sought assistance to obtain independent housing, accommodation in public or community housing nearly tripled and there was an almost 10% increase in the number of people in private rental after a closed support period.<sup>31</sup> Importantly, the length of time that an individual was accommodated in SAAP or Crisis Accommodation Program (CAP) accommodation had an impact on the type of accommodation they were likely to move into following support – following 13 weeks of accommodation, clients more often moved into public or community housing than other forms of housing and the proportion living in a car, park, tent, street or squat after support generally decreased as the length of SAAP or CAP accommodation provided to the client increased.<sup>32</sup> It is also important to acknowledge that ‘the process of moving clients from entrenched homelessness to secure housing and participation in the life of the community often takes time and requires ongoing availability of support and accommodation’, such that repeated use of SAAP facilities should not be viewed as a failure of the service provider.<sup>33</sup>

It is very difficult to measure the impact of the social and emotional support that SAAP workers provide to clients, however, it should be noted that clients generally expressed satisfaction with all aspects of SAAP service, being most satisfied with staff (at 72% ‘really good’).<sup>34</sup> As noted above, other aspects of SAAP service delivery may not be captured by outcome measures – emotional support, respect and trust, someone who listens– but should not be under-estimated.

ACOSS understands that the Green Paper has generated a level of uncertainty within the SAAP sector about the future of funding for crisis accommodation services. It is important that the White Paper acknowledges the continuing need for crisis accommodation (at a level higher than is currently available, due to high levels of unmet need) and provides some core guarantees about the maintenance and enhancement of service levels and funding.

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<sup>30</sup> Ibid at 77.

<sup>31</sup> Ibid at 77.

<sup>32</sup> Ibid at 78.

<sup>33</sup> Ibid at 78.

<sup>34</sup> Ibid at 86.

## Some comments on the proposed options

The absence of detailed modelling of the various options proposed in the Green Paper has made the sector's task of critical engagement more challenging. In this section, we offer some general comments in relation to the proposed options, before outlining key elements of a preferred fourth option in the next section.

### **Option 1: Transform SAAP to build a national homelessness response focussed on distinct streams**

This Option proposes the restructuring of SAAP services around four streams of support related to population groups and life events:

- youth
- people experiencing or escaping domestic and family violence
- single people
- families in housing stress.

This would involve the 'alignment' of current crisis services, including SAAP, with mainstream service systems (employment, health, justice and housing). The service system restructure would involve the 'disaggregation' of current homelessness programs and 'relocate' specific elements 'to areas where the strongest links need to be formed'. The Green Paper suggests that 'in this way, SAAP funding and services could be more gradually moved to operate within mainstream service systems.'

ACOSS is concerned that this Option poses a number of identifiable risks. The first is the risk of people falling between population based service delivery streams and thus not having their needs appropriately met. The second is the length of time that this restructure would be likely to take and the disruption that would be caused to service delivery. We also have concerns about the abilities of the mainstream service systems identified to respond appropriately to those experiencing or at risk of homelessness, and note that these different systems may have very different philosophies underpinning service delivery (for example, comparing health and justice system approaches).

ACOSS notes that one of the strengths of the SAAP service system is its flexibility in service delivery to attempt to meet the needs of a diverse range of clients. A streamed system, with fairly rigid links to designated mainstream services, risks losing this flexibility and constructing service silos. We also have some concerns about the appropriateness of the proposed alignment of client need with a specific mainstream service, given the likely multiple and complex nature of client needs, for example, young people may need to be supported by health, mental health and housing services in addition to education, employment and training.

Little information is provided as to how funding and accountability frameworks would operate under this Option, though it is suggested that pooled funding might encourage service integration. More detailed modelling on this funding proposal is required, as well as information as to how this would relate to the National Affordable Housing Agreement (NAHA), given the role of multiple Government departments and agencies.

Finally, ACOSS is concerned that this Option fails to adequately address the structural causes of homelessness through wide scale reform of mainstream service systems and a significant expansion in public and community housing.

### **Option 2: Improve the current SAAP response**

As discussed above, ACOSS believes that any reformed response to homelessness should build on the strengths of SAAP. Crisis accommodation services should be enhanced to enable them to meet existing need and play an expanded role in case management, brokerage, prevention and early intervention and post-crisis support. We would support the general principles suggested under Option Two, but submit that, in the absence of mainstream service system reforms and improvements and an expansion in funding for public and community housing, this is an inadequate response.

### **Option 3: Improve the mainstream service response to homelessness and restrict SAAP to responding to crisis interventions**

Option 3 proposes '[boosting] the capacity of mainstream services to respond to homelessness with a particular focus on early intervention and prevention.' This would involve an expanded role for mainstream services in prevention and early intervention, but would place restrictions on the role of homelessness services, which would be limited to short-term and crisis-based interventions. The Green Paper foresees that 'this option would enable the gradual winding back of SAAP, as mainstream services increasingly took responsibility for preventing and addressing homelessness.'<sup>35</sup>

In general, ACOSS supports the proposal to enhance the mainstream service response to homelessness and believes that the Green Paper offers some interesting mechanisms for achieving these improvements, for example, the development of specific goals and targets in national funding agreements, incentive systems linked to outcomes and investment in new integrated service delivery models. However, we would argue that these improvements must be complemented by an enhancement of the role of SAAP providers. As noted above, the SAAP sector is characterised by some unique strengths and capacities, often connected to the relationship-based support which some SAAP services provide and the trust clients are likely to feel towards SAAP services which they may not feel towards mainstream services. As noted above, it is also important to recognise the mainstream service system's current lack of capacity to adequately provide services to those who are homeless. Many mainstream programs have lengthy waiting lists and little or no expertise in dealing with the complex needs of those who are homeless. Efforts to up-skill departmental and agency staff to work better with people experiencing, or at risk of, homelessness will take time. ACOSS is also aware that some additional concerns have been raised by SAAP providers in regional, rural and remote areas about any reduction in the role of SAAP and expansion in the role of mainstream services, on the basis that many of these areas currently lack basic mainstream services and may lack infrastructure to enable a short-medium term expansion in the capacity of mainstream services. Finally, it is unclear who, under this option, would play the role of linking clients with the range of services they may require. Homelessness service providers seem to be uniquely placed to play this role, but their capacity would need to be enhanced.

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<sup>35</sup> Green Paper at 68.

## Key elements of a proposed fourth option

ACOSS believes that none of the options proposed in the Green Paper represents an adequate or appropriate response to homelessness. The Green Paper presents, as alternatives, the enhancement of SAAP services or the improvement of the mainstream service response to homelessness. We see a number of problems with this positioning. Firstly, it denies the possibility of reforms to both systems to:

- enhance the capacity of crisis accommodation services to meet existing demand, provide brokerage and case management services and improve the sector's capacity to provide prevention, early intervention and post-intervention support; and
- strengthen the mainstream service response to prevent homelessness and facilitate exits from homelessness.

Although recognising some of the structural causes of homelessness, none of the Green Paper options engages with the broader context in which homelessness occurs, nor seeks to address the impact of other Government policies and programs on homelessness including the social security system, the criminal justice system, the mental health system and the health and aged care systems. Further, the Green Paper options do not reflect its findings on some of the key structural causes of homelessness. As noted above, the most recent SAAP IV evaluation found that the most significant cause of homelessness was the lack of affordable housing. This is both a factor causing people to end up homeless, with recent research suggesting that, of those who seek assistance from crisis accommodation services, some 50% are private renters,<sup>36</sup> and reduces exit options from crisis accommodation. Despite this, the Green Paper does not adequately address this issue.

ACOSS proposes that the following five elements should form the basis of a new national response to homelessness:

1. An increase in the stock of public, community and other affordable housing;
2. A National Homelessness Strategy with goals and targets;
3. A new National Affordable Housing Agreement which includes housing and homelessness funding programs and the inclusion of homelessness outcomes in other SPPs;
4. The expansion of effective prevention and early intervention programs; and
5. The enhancement of homelessness support services to meet existing need, provide longer term and post-crisis support and to increase case management and service brokering capacity.

### **1. An increase in the stock of public, community and other affordable housing**

Public and community housing plays a vital role in meeting the housing needs of low income Australians for whom other housing sectors are unaffordable or unable to meet specific needs. It therefore plays a key role both in preventing homelessness, but also in providing exit options for people experiencing homelessness. Although the demand for public housing remains high and is likely remain so, driven by an increase in the aged

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<sup>36</sup> St Vincent de Paul Society, *Don't Dream it's Over*, 2007 at 7.

population and the continuing increase in single-parent families<sup>37</sup>, the supply of public housing has declined from 365,000 in 1995 to 341,000 dwellings in 2006, resulting in tighter targeting and shorter tenure periods in many States and Territories.<sup>38</sup> As is noted in the Green Paper, the Australian Government contribution to CSHA funding has fallen by 30% in real terms since 1996. Further, the supply of community and other non-profit housing remains very low by international standards.

In most States and Territories, people cannot obtain public and community housing unless they have very low incomes or experience other major forms of disadvantage. Even then, they may face considerable delays before being able to access housing. Increases in the cost of private rental, coupled with tighter targeting of public and community housing, have severely reduced exit options from crisis accommodation. ACOSS advocates for a significant expansion in funding to public and community housing to increase the level of public and community housing to at least 6% of all housing stock in the short-medium term. We support the recent Senate Committee Inquiry into Housing Affordability recommendation that social housing stock should be increased over the longer term to 10% of all housing stock by 2020.<sup>39</sup> However, we emphasise that regional variations in housing demand should be taken into account in achieving this goal. For example, the Northern Territory has both higher levels of public and Indigenous community housing stock along with very high levels of need and parts of Western Australia have very high Indigenous populations, a steady influx of people to service the resources boom and an increase in poverty due to rises in the cost of living, with many low income workers unable to sustain rent increases. We also call for any revenue from the sale of public housing to be directed back into the public housing system, rather than resulting in an overall reduction in public housing stock.

The National Rental Affordability Scheme will play a significant role in increasing investment in low rent housing. It is unclear whether this scheme will cater for the needs of those experiencing homelessness and we await further information about eligibility criteria and priority allocation under the Scheme. In its submission to the NRAS Technical Discussion Paper, ACOSS recommended that various mechanisms be employed to ensure that low income households have priority access to dwellings under the Scheme. For example, we suggested that this might be achieved through the National Assessment Criteria (which may include criteria on the profile of tenants, especially their income levels) and through Calls for Expressions of Interest which may include additional eligibility criteria in addition to those specified in the National Eligibility Requirements and National Assessment Criteria. The Technical Paper suggests that 'characteristics of tenants' might be a 'particular area of housing need' to be given priority in a particular Call. We noted, however, that this approach would not necessarily guarantee priority access across the NRAS and there may be other mechanisms by which this might be achieved, for example, by inclusion in the new National Affordable Housing Agreement of some benchmarks relating to low-income households. These might include guarantees that:

- An increase in the supply of affordable rental dwellings should include a minimum number of dwellings for which rent must be kept below 25% of residents' incomes

<sup>37</sup> AHURI, 'Projected housing demand in Australia to 2011', *AHURI Research and Policy Bulletin*, Issue 33 June 2004.

<sup>38</sup> Australian Institute of Health and Welfare, *Australia's Welfare 2007*, at 237.

<sup>39</sup> Select Committee on Housing Affordability in Australia, *A good house is hard to find: Housing affordability in Australia*, June 2008, Recommendation 10.5.

for a minimum period in addition to a minimum number of dwellings for which rent must be kept at least 20% below market rates; and

- A designated percentage of new affordable rental dwellings should be occupied by low-income and/or high needs households.

If those experiencing or at risk of homelessness are to be given priority under the NRAS, it is imperative that adequate safeguards are in place to ensure that tenancy managers are able to deal supportively and sensitively with this vulnerable group of tenants. The regulation of housing managers under the Scheme should play a role in ensuring that managers are experienced in supporting stable tenancies for highly disadvantaged tenants. The effectiveness of this arrangement would also depend on the availability of other necessary support services to assist people to remain in their homes (for example, psychosocial support services or alcohol and other drug services). More generally, an increase in the stock of affordable housing must be accompanied by secure tenure and support where necessary, as well as access to education, training, and employment.<sup>40</sup> We therefore support the Green Paper's proposal that a new national effort on homelessness needs to provide housing plus a support package with support 'tailored to each individual and focused on the outcomes that will make the greatest long-term difference to their lives'.<sup>41</sup>

## **2. A National Strategy with goals and targets**

A national homelessness strategy should be developed to provide a framework for homelessness policy and funding within a broader social inclusion agenda. Such a framework is critical to achieve real outcomes around homelessness through cross-government and federal cooperation. This strategy should coordinate federal government policies and programs which impact upon homelessness, while also providing a framework for Commonwealth, State and Territory coordination and cooperation.

The strategy should include goals, targets and benchmarks, which should be reflected in the NAHA. These goals and targets would provide an accountability mechanism to measure the performance of the various levels of Government.

ACOSS generally supports the possible targets suggested in the Green Paper<sup>42</sup> but proposes some additional goals and targets, including:

- The long term elimination of primary homelessness;
- An increase in the number of people exiting from crisis accommodation into stable accommodation;
- A decrease in the number of people who are 'chronically' homeless (repeat users of homelessness services); and
- A decrease of the number of people who are discharged from mental health services or released from prison without stable and affordable housing ('discharged into homelessness').

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<sup>40</sup> At pg 139.

<sup>41</sup> Green Paper at 60.

<sup>42</sup> See pg 57.

In measuring progress against these goals and targets, it is important that homelessness is defined and measured to include primary, secondary and tertiary homelessness, with goals and targets set in relation to this broader population rather than just 'rough sleepers', as in the UK approach. Further, as noted above, the measurement of progress against these goals and targets will require much better and more regular data collection than is currently conducted.

The national strategy should provide a framework within which the coordination of mainstream services and homelessness services can be improved. As the Green Paper notes, there are a wide range of mainstream services at the Commonwealth, State and Territory and local government levels which provide services to those who are homeless or at risk of homelessness including:

- The social security system;
- Public housing services run by state and territory governments;
- The health system run by public, private and community health services;
- Employment services;
- Education and child care services;
- Correction and juvenile justice services;
- Child protection services;
- Specialist services such as mental health, drug and alcohol, financial counseling and legal services; relationship counseling; advocacy and information services; and
- General support services.<sup>43</sup>

### ***Coordinating Federal policies and programs to improve the homelessness response***

At the Federal level, there are a number of policy areas that must be coordinated to achieve real homelessness outcomes including social security and welfare to work reforms, policies to address Indigenous disadvantage, employment services reforms, domestic and family violence programs and family law reform. Issues arising from the intersection of these policy areas are discussed below and would need to be addressed in any national strategy.

#### ***Social security and employment participation***

There are a number of critical links between social security law and policy and homelessness that should be addressed in a national strategy. The Green Paper notes that the number of people citing financial difficulty as the primary cause for seeking assistance from SAAP services has been increasing. This is consistent with the increasing costs of housing, food, fuel and energy. More specifically, a number of specific issues related to access to income support and employment participation impact directly on homelessness, including the 'Welfare to Work' compliance regime, the adequacy of crisis payments, the adequacy of rent assistance and aspects of employment services reforms.

Under the 'Welfare to Work' compliance regime, eight week no payment penalties are imposed on individuals for failure to comply with obligations under the scheme. Up to February 2008, some 40,868 eight week no payment periods were applied. Research has suggested that between 10-20% of those who receive an eight week penalty lose their

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<sup>43</sup> Green Paper at 36.

accommodation as a result.<sup>44</sup> The National Welfare Rights Network has estimated that the figure is probably much higher than this by the time the penalty period comes to an end. ACOSS has welcomed recently announced reforms to the compliance regime. However, although the new system will provide more flexibility and discretion in the decision as to whether to impose an eight week penalty period, ACOSS believes that the penalty period remains too harsh, particularly for those in socially vulnerable situations. We are also concerned that the existing eight week penalty rule is to continue to be imposed until July 2009, when the new employment services system is introduced. If there is no reversal in current trends, this will result in a further 45,000 eight week penalties being imposed. ACOSS submits that the eight week period of suspension should be substantially reduced and that proposed changes to the eight week penalty regime should be introduced as soon as possible.

We have also raised concerns about the new 'no show, no pay' rule which is likely to disproportionately affect vulnerable and disadvantaged people, for example, those experiencing or at risk of homelessness. The rule applies to job seekers who miss a day of activity (such as work experience or training) without an acceptable reason. In our recent submission on the proposed employment participation model, ACOSS recommended that consultation should be conducted with key stakeholders over the design of this rule, including options for job seekers to avert a loss of payment through further activity, a discretion for providers not to impose a payment reduction where the job seeker has barriers to work affecting attendance and measures to minimise red tape and compliance costs.<sup>45</sup>

Crisis payments are currently available to people in receipt of a social security payment who are experiencing a limited number of 'defined circumstances'. ACOSS has concerns about the limited eligibility for the payment as well as the level of the payment, which provides for only one week's payment of a payment or allowance. We submit that the payment should provide, at the least, for two weeks payment, with discretion to provide an additional payment in appropriate circumstances. There should also be an expansion of resources to improve Centrelink's capacity to respond to the needs of those exiting prison, for who additional support is needed in order to access accommodation, acquire essential items and access relevant services.

Commonwealth Rental Assistance (CRA) is the most significant form of direct rental assistance provided by Government to tenants in the private rental market. At present, as the Green Paper notes, funding to CRA is now greater than the Commonwealth's contribution to public housing.<sup>46</sup> The impact of CRA on affordable housing supply is unknown. ACOSS calls for a review of CRA to ensure that it best meets the needs of struggling renters. We note that the recent report from the Senate Committee on Housing Affordability also recommends a review of CRA, 'to ascertain its effectiveness and cost effectiveness in improving housing affordability for low to medium income households and to make recommendations regarding future directions for the programme, including eligibility criteria'.<sup>47</sup>

<sup>44</sup> Green Paper at 37 citing Eardley, T., Norris, K. & Rawsthorne, M. (2005) The Impact of Breaches on Income Support Recipients, Social Policy Research Centre.

<sup>45</sup> ACOSS, Submission to the Minister for Employment Participation, 'The proposed employment participation model'.

<sup>46</sup> Green Paper at pg 37.

<sup>47</sup> Senate Committee on Housing Affordability in Australia, 'A good house is hard to find: Housing affordability in Australia', June 2008 at pg 8.

ACOSS has welcomed some of the key features of the Government's proposals to reform employment services and activity requirements for job seekers. We are pleased that the rigid continuum of support and requirements is to be replaced by arrangements which enable providers to support individual needs more flexibly and we welcome the shift from penalising job seekers after the event towards engaging them with the labour market. Stream 4 of the proposed new employment services system is designed to replace the Personal Support Program (PSP) and the Job Preparation and Employment and Training Program (JPET). While the PSP program provides support to people with non-vocational barriers to employment (which includes many homeless people), JPET specifically focuses on young people experiencing homelessness. An increase in resources is proposed to this stream under the new system, the stream will be uncapped and has been integrated into the mainstream employment services system. While the allocation of additional resources to this highly disadvantaged group of jobs seekers is welcomed, there are risks that come with the mainstreaming of these programs. Principally, there is the risk that social support and work preparation services may be diminished due to the focus on employment outcomes as distinct from social outcomes and the loss of specialist providers. There are also risks created by the lack of incentives to offer social support services. These issues are explored in more detail in our recent submission.<sup>48</sup> ACOSS made a series of recommendations relating to these reforms, including that providers be permitted to specialise in the provision of Stream 4 services and that the existing PSP and JPET programs should be expanded between now and the transfer of participants to Stream 4 to reduce waiting lists.<sup>49</sup>

### *Domestic and family violence*

Domestic and family violence has been identified as the most common reason people seek the assistance of SAAP support services. An effective response to homelessness therefore needs to coordinate domestic and family violence and homelessness policies and service responses. This should include coordination of the Federal Government's National Plan to Reduce Violence Against Women and Children, and examine the impact of recent family law reforms on homelessness. The national strategy should also seek to improve the response of mainstream services to domestic and family violence to ensure that these services play a role in identifying those at risk, enhancing their prevention and early intervention response and do not increase the risk of homelessness for women and children at risk, for example, by evicting vulnerable tenants from public housing. There is also a need to remove the potential for conflicts between Federal and State and Territory judicial processes around family law and domestic violence. The viability of expanding existing programs to enable women who have experienced or are at risk of domestic violence to safely remain in their homes should also be explored.

Many women who are escaping domestic violence will be accompanied by children. It is vital that crisis accommodation services are adequately resourced to provide appropriate services for accompanying children, including services which seek to address the trauma and anxiety children are likely to have experienced through exposure to domestic violence situations. This issue is raised below in our discussion of proposed enhancements to the SAAP program.

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<sup>48</sup> ACOSS, Submission to the Minister for Employment Participation, 'The proposed employment participation model', at 12.

<sup>49</sup> Ibid.

### *Indigenous disadvantage*

Indigenous people are over-represented as clients of the SAAP system and among the broader homeless population. Indigenous people comprise 17% of SAAP clients, despite constituting approximately 2% of the population. A significant proportion of this client group is escaping from domestic violence.<sup>50</sup> While we welcomed the Prime Minister's commitment to establish a joint policy commission to address Indigenous housing, it is unclear whether this commission will be tasked with examining issues related to Indigenous homelessness or whether these issues will be addressed within a mainstream homelessness strategy. In our view, addressing Indigenous homelessness must form part of a national strategy to address Indigenous disadvantage but have clear linkages to the national homelessness strategy. Homelessness strategies must be developed in conjunction with broader measures to improve Indigenous access to appropriate and affordable housing noting the high levels of over-crowding among the Indigenous population, chronic housing shortages, exclusion from the home purchase and rental markets due to poverty and discrimination, the decline in public housing stock and the dilapidation of existing Indigenous housing stock in remote communities.

It is also important that the complex social and cultural aspects of Indigenous housing are considered in the development of an effective response but that some minimum housing standards are developed.<sup>51</sup> Adequately funded culturally appropriate crisis accommodation services must also form part of the response to Indigenous homelessness. The SAAP IV Report concluded that the only approach likely to successfully address Indigenous homelessness is a partnership approach designed to ensure a coordinated response and involving the engagement of Government departments, independent service providers and local Indigenous community representatives. Any approach must involve solutions that are tailored to the specific needs of urban, regional and remote Indigenous communities. In doing so, the very high rate of Indigenous homelessness in the Northern Territory must be acknowledged, as well as any unintended effects of the Northern Territory Intervention on homelessness (for example, an increase in the number of homeless people living on the urban fringes or 'long-grass').

Reforms to the national response to Indigenous homelessness should be informed by the *Indigenous Homelessness within Australia* report, prepared by the Commonwealth Advisory Committee on Homelessness and the Department of Families, Community Services and Indigenous Affairs in 2006. This report identifies a number of appropriate and effective service delivery mechanisms, including case management, outreach and brokerage. It also developed a series of principles which should underpin Indigenous Service Delivery and suggested a number of appropriate service delivery strategies.

<sup>50</sup> SAAP IV Evaluation Report at 169 reports that some 33% of Indigenous clients are escaping from domestic violence, compared to 17% of other clients.

<sup>51</sup> For a discussion of these social and cultural aspects, see AHURI, 'Categories of Indigenous 'Homeless' people and Good Practice Responses to their Needs' (2003).

### *Migrants, refugees and culturally and linguistically diverse (CALD) communities*

The real rate of homelessness among migrant, refugee and CALD communities is difficult to ascertain. These population groups experience a number of forms of disadvantage which would suggest that they are at greater risk of homelessness despite the fact that they are under-represented in SAAP services.<sup>52</sup> Further analysis is required to determine the reasons for this under-representation, though it is likely that limited grasp of English and low levels of awareness about available services and supports are contributing factors. Refugees and asylum seekers are vulnerable to social exclusion and poverty, and therefore homelessness, due to visa restrictions which limit their capacity to work, the right to receive social security and access to Medicare entitlements and government assistance and training.<sup>53</sup> Refugee and asylum-seeker communities are also more likely to experience tertiary homelessness, often living in over-crowded or sub-standard conditions.

There is a need for policy coordination to ensure that migration policies and laws do not contribute to homelessness among vulnerable migrant, refugee and asylum seeker populations. A coordinated policy approach should address the specific issues experienced by Temporary Protection Visa (TPV) holders (we welcome the Government's recent decision to abolish this class of visa), recent migrants and New Zealand citizens without permanent residence status.

### *Older persons*

Homeless persons over 65 years of age will have potentially have experienced long term or iterative homelessness, have complex health and mental health problems and be largely socially excluded, cut off from networks of family and friends. Due to the complexity of the issues that this population group is likely to face, they are often excluded from aged care services or are unable to have all of their needs met by the mainstream service system. In addition, with the decline in housing affordability and tighter targeting and long waiting lists for public and community housing, aged pensioners are experiencing increasing rates of housing stress. There is a need for aged care, health and homelessness service systems to work together to address the needs of those over 65 who are experiencing or at risk of homelessness. At present, most SAAP services are unable to provide the long term accommodation, care and support that is required by this group, while the aged care system is ill-equipped to deal with some of the complex needs of the homeless population. Further development of specialist models of service for older people who are experiencing or at risk of homelessness is required to provide permanent accommodation, care and support.

### ***Coordinating State and Territory policies and programs to improve the homelessness response***

At the State and Territory level, the role of mainstream services and systems which contribute to homelessness must be improved with better linkages developed between these services and homelessness support services. Many mainstream services, both government and non-government, have significant waiting lists and currently lack the capacity to identify those at risk of homelessness let alone provide appropriate support to

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<sup>52</sup> See Australian Institute of Health and Welfare, *Homeless People in SAAP*, SAAP National Data Collection annual report 2005-06 Australia, at 22-23.

<sup>53</sup> Hanover Welfare Services, *A New Country – But No Place to Call Home*, 2004, Melbourne, p17, cited by HREOC, *Homelessness is a Human Rights Issue* (2008).

this highly disadvantaged group. Enhancing the response of these services to the needs of those experiencing or at risk of homelessness will therefore require long-term investment and cross-agency coordination.

As noted above, the NAHA provides an opportunity to set goals and targets by which the performance of the States and Territories can be measured. Mechanisms to improve the response of programs which currently contribute to homelessness should also be explored, with States and Territories being responsible for ensuring that vulnerable people leaving the mental health, state care or criminal justice systems are not discharged into homelessness. This approach has been applied by the Irish Government, which developed National Action Plans and a cross-agency Homeless Preventative Strategy to ensure that no one was released from state care without somewhere suitable to live and appropriate care. Structures should also be put in place to maintain housing in the event of, for example, temporary admission to a mental health service.

Option 3 proposed in the Green Paper includes a number of structures designed to improve the mainstream service response. This provides a useful starting point in considering what might be done. These structures include enhancing the role of public and community housing providers and Centrelink in referring struggling households to relevant support services, health services developing outreach capacity to assist people with a mental illness to maintain their tenancies and investment in new integrated service delivery models such as the NSW Housing and Support Initiative (HASI) to assist people with a mental illness to participate in community life, maintain tenancies and improve their quality of life.<sup>54</sup>

The HASI is a partnership between the NSW Departments of Health and Housing and non-government organisations which aims to assist people with mental health problems requiring accommodation support to 'participate in the community, maintain successful tenancies, improve quality of life and most importantly to assist in the recovery from mental illness.'<sup>55</sup> An evaluation of the HASI program found that it mediated some of the effects of mental illness, provided a networked system of support from housing and community support providers and enabled some people to maintain tenancies, increase participation in the community and develop and strengthen social and family networks.<sup>56</sup>

The Green Paper suggests a number of specific initiatives to improve the available support for different population groups experiencing or at risk of homelessness. A number of proposals relate to younger people and are designed to create or strengthen linkages between homelessness and other services systems. These include improving education and personal support options for teenagers with low school attainment to stay in learning and find pathways to employment, providing mentoring, counselling and life skills training to build resilience and giving young people leaving child protection systems access to Foyer models. However, as noted above, a number of the measures proposed attach conditions to housing, for example, 'raising school retention by providing accommodation for young people on the condition that they participate in education, training and employment, which

<sup>54</sup> For an evaluation of the HASI Program, see Kristy Muir, 'Housing Support for People with a Mental Illness', *SPRC Newsletter*, No 98, March 2008.

<sup>55</sup> NSW Health and NSW Department of Housing 2005, *Housing and Accommodation Support Initiative (HASI) resource manual (draft version 1.7)*, NSW Health and NSW Department of Housing, Sydney, cited in Kristy Muir, 'Housing Support for People with a Mental Illness', *SPRC Newsletter*, No 98, March 2008.

<sup>56</sup> Kristy Muir, 'Housing Support for People with a Mental Illness', *SPRC Newsletter*, No 98, March 2008.

are all provided in the one location'. As noted above, ACOSS would not support conditions being attached to the provision of housing, which should be considered a basic right.

SAAP services have consistently reported an increase in the complexity of client needs arising from the occurrence or co-occurrence of mental health problems, alcohol and drug use, behavioural disorders, intellectual disabilities, chronic health problems and sexual abuse. These issues demand an intensive and complex service response and access to specialist services which SAAP may not be in a position to provide (for example, mental health or drug and alcohol rehabilitation). Intensive services must also be developed or enhanced to provide for the needs of those people who are excluded from SAAP due to the complexity of their conditions or behaviours, which, for example, may pose a risk to other clients.

Finally, improvements to the mainstream service response to homelessness should seek to address some critical gaps which have been identified in allied service systems. These include:

- Crisis services which can respond to people with personality disorders and disordered behaviour;
- Specialist services which can respond to those who are experiencing homelessness with dual/multiple problems;
- Appropriate mental health and health services;
- Specialist and generic services which can respond to people with disruptive behaviour; and
- Ongoing support for people with high needs to enable them to retain accommodation successfully in the community.<sup>57</sup>

### *Mental health*

The National SAAP Data Collection indicates that in 2004–05, 11,800 SAAP clients (or around 12%) reported a mental health problem and 19,400 (or around 19%) reported a substance use problem. Some clients in these groups reported both a mental health and a substance use problem (co-morbidity or dual diagnosis) within the same support period (4,800 or around 5% of clients).<sup>58</sup> These figures should be used with caution, however, as it is likely that the prevalence of mental health and substance use problems is underreported in the National Data Collection.<sup>59</sup> Clients with a mental health or substance use problem were most commonly living in SAAP or other emergency accommodation both before entering and upon leaving a SAAP agency. This suggests that these clients are moving within the SAAP system in order to secure accommodation and that achieving long term outcomes for this group, for example, secure housing, is more difficult.<sup>60</sup>

Crisis accommodation services are not resourced or equipped to provide the specialist services required by people with a mental illness. This support is the role of the mental health system. However, inadequately resourced mental health services place increased pressure on homelessness services and constrain exit options. The process of de-

<sup>57</sup> SAAP IV Evaluation report at 52-53.

<sup>58</sup> Australian Institute of Health and Welfare, 'Homeless SAAP clients with mental health and substance use problems 2004-05, A report from the National SAAP Data Collection, Bulletin 51, March 2007 at 2.

<sup>59</sup> Ibid at 3.

<sup>60</sup> Ibid at 3.

institutionalisation has also played a contributing role to homelessness with the increase in the number of people living outside institutions not matched by a commensurate funding increase for supported accommodation, specialist community mental health services or support for families and other carers.<sup>61</sup>

Improving the mental health system will require an increase in acute and continuing care treatment services, an increase in supported accommodation for people with a mental illness (see, for example, the HASI program, discussed above) and agreements or standards around discharge from mental health facilities to ensure appropriate accommodation is secured and thereby prevent homelessness. Research suggests that stable housing has a dramatic improvement on outcomes for people with a mental illness, including residential stability and use of institutional settings, such as hospitals, detoxification facilities and the criminal justice system.<sup>62</sup> The National Reform Agenda provides an important opportunity to facilitate federal cooperation to achieve these objectives.

#### *Alcohol and other drug services*

Substance use is a major issue affecting those experiencing or at risk of homelessness and, as noted above, may co-occur with mental illness. Crisis accommodation services are not resourced or designed to provide specialist alcohol and other drug services, but may also be unable to refer clients to specialist services due to the high levels of demand or the co-occurring nature of clients' conditions. A new national homelessness strategy should ensure that government and non-government alcohol and other drug services are enhanced and expanded and that better linkages are developed between these services and homelessness services. Existing alcohol and drug treatment programs are often not integrated with accommodation and support services such that the creation of drug and alcohol services that can provide accommodation for people who are homeless should be a priority.<sup>63</sup>

The need to simultaneously address the various needs of the homeless population with alcohol and drug problems is clear. As a literature review on mental health and homelessness conducted in 2005 noted, 'residential stability is an attainable goal when service systems are well-integrated, substance abuse treatment is part of a comprehensive treatment approach and there is a range of housing choices with flexible support available'.<sup>64</sup> In addition, specific service gaps, such as for people with a dual-diagnosis, should be addressed.

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<sup>61</sup> Commonwealth Advisory Committee on Homelessness, *Working Towards a National Homelessness Strategy: Response to Consultations*, Department of Family and Community Services, 2003 at 71.

<sup>62</sup> St Vincent's Mental Health Service and Craze Lateral Solutions, *Homelessness and Mental Health Linkages: Review of National and International Linkages*, May 2005 at v.

<sup>63</sup> This was a priority action identified by the Commonwealth Advisory Committee on Homelessness in its report, *Working Towards a National Homelessness Strategy: Response to Consultations*, Department of Family and Community Services, 2003 at 77.

<sup>64</sup> St Vincent's Mental Health Service and Craze Lateral Solutions, *Homelessness and Mental Health Linkages: Review of National and International Linkages*, May 2005 at v.

### *Criminal justice*

People exiting from the criminal justice system have been identified as at particular risk of homelessness due to a number of barriers, including:

...growing waiting lists for public and community housing; a decrease in the availability of boarding housing accommodation; discrimination faced in the private rental market as well as the difficulties of ex-prisoners obtaining employment. People leaving prison not only face the aforementioned barriers but also face the additional barriers of disjointed, poor or no rental references, low social skills/low self esteem, prejudice and discrimination, having been taken off the public housing list, or coming out with a public housing debt or other debts.<sup>65</sup>

Studies have also shown a relationship between difficulty in securing suitable accommodation post-release and recidivism.<sup>66</sup> AHURI research has revealed, unsurprisingly, that ex-prisoners were more likely to return to prison if they were homeless or transient on release, concluding that 'assisting ex-prisoners to find stable housing immediately post-release should be a priority for State Government corrections departments and support agencies'.<sup>67</sup>

Without stable housing, it is virtually impossible to address mental health, drug and alcohol and employment issues. Given the individual and social benefits of providing transitional housing to this high-risk population group, ACOSS believes that this should be a joint-government, cross-agency effort. Housing support should be tailored to address the specific needs of people exiting prison, with different levels of support available according to need.<sup>68</sup>

The other intersection between the criminal justice system and homelessness occurs with the criminalisation of certain conduct in public spaces. In his report last year, the Special Rapporteur on adequate housing noted that legislation existed in all urban centres in Australia which criminalised essential human activities, such as sleeping, or created 'move on' powers which authorise police to displace people live in public places.<sup>69</sup> He recommended that:

...laws that criminalise poverty and homelessness and those currently disproportionately impacting upon homeless people such as begging laws, public drinking laws and public space laws, should be revised and amended to ensure that fundamental human rights are protected.<sup>70</sup>

ACOSS calls for federal cooperation to repeal such legislation as part of a national response to homelessness.

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<sup>65</sup> HREOC, *Social Justice Report 2004* citing Davis, J. 'Post Release-release Issues and Accommodation', *Parity, Post Release-release and Homelessness Issue*, Vol 14, Issue 10, November 2001, pp13-15.

<sup>66</sup> Baldry, E. et al, *Ex-Prisoners and Accommodation: What Bearing do Different Forms of Housing Have on Social Reintegration of Ex-Prisoners?*, *op cit*, p.vi, cited by HREOC, *Social Justice Report 2004*.

<sup>67</sup> AHURI, 'The role of housing in preventing re-offending', Issue 36, *AHURI Research and Policy Bulletin*, February 2004.

<sup>68</sup> AHURI, 'The role of housing in preventing re-offending', Issue 36, *AHURI Research and Policy Bulletin*, February 2004.

<sup>69</sup> Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, Mission to Australia, 11 May 2007 at pg 14.

<sup>70</sup> Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, Mission to Australia, 11 May 2007 at pg 32.

### *Care and protection*

A high proportion of young people experiencing homelessness have been in care and protection, with estimates varying from 15-40% of the homeless youth population<sup>71</sup>. The recent National Youth Commission Inquiry into Youth Homelessness made a number of findings in relation to current care and protection systems. It noted that State and Territory systems are under resourced and under-staffed, with the needs of younger children prioritised at the expense of those of older children.<sup>72</sup> With increased pressure on care and protection systems, SAAP services have become a 'stop gap' service for adolescents.<sup>73</sup> The need for leaving care assistance, accommodation and support was highlighted, with calls for this to become a universal entitlement.<sup>74</sup>

ACOSS endorses the recommendations of the Commission designed to improve the response of care and protection systems to young people at risk of homelessness. In particular, we support the Commission's recommendations that:

- The Human Rights and Equal Opportunity Commission consider a national inquiry into care and protection;
- The Federal Government become a co-partner with the States and Territories in reforming Australia's care and protection sector;
- Needs based support be provided to all young people leaving care; and
- All jurisdictions urgently review the level of funding provided to their care and protection programs.

### **3. A new National Affordable Housing Agreement which includes housing and homelessness funding programs and the inclusion of homelessness outcomes in other SPPs**

As part of the Government's commitment to 'cooperative federalism', the current system of Special Purpose Payments is to be reformed. This will result in a reduction in the number of SPPs from 88 to five. It is understood that the new broad-banded SPPs will define resource levels and outcomes, without detailed specification as to the means by which these outcomes are to be achieved. This is designed to give the States and Territories more flexibility in the way that they administer services. Each SPP will contain a clear, mutually agreed statement of objectives, outcomes and outputs, performance indicators and roles and responsibilities of all levels of government. The NAHA will be one of these SPPs and will replace the Commonwealth State Housing Agreement (CSHA).

It is important that the national reform agenda delivers better outcomes for low income and disadvantaged people who are currently disproportionately affected by service system gaps and non-alignments. We suggest that reforms to the funding and delivery of human and social services be underpinned by joint Commonwealth/State guarantees that existing services will continue to receive funds at current or increased levels provided that they meet the conditions of new service frameworks. This will play an important role in addressing uncertainty in the sector about the potential of the reforms to undermine community service

<sup>71</sup> For a discussion of the various estimates, see National Youth Commission, *Australia's Homeless Youth: A Report of the National Youth Commission Inquiry into Youth Homelessness*, 2008 at 127.

<sup>72</sup> At 127.

<sup>73</sup> At 133.

<sup>74</sup> At 127.

delivery. This could be supported by the inclusion of minimum level entitlements to health, housing and community services for all residents, regardless of their place of residence or financial means.

Given that any effective response to homelessness must be inter-sectoral and cross-portfolio in nature, the National Reform Agenda provides a valuable mechanism to achieve improvements across a number of service delivery areas. To achieve this integration, a number of different SPPs should contain homelessness-related outcomes including health care, disability services, schools and vocational education and training. Issues related to domestic violence, young people, mental health, alcohol and drug use and child protection could be specifically addressed in this way. Under such a model, all relevant government departments at the Federal, State and Territory levels would have clear responsibilities and targets related to homelessness, providing a framework to significantly improve the mainstream service system response to homelessness. In this way, the reform agenda can facilitate the provision of flexible and tailored service delivery to those experiencing or at risk of homelessness. It should ensure that 'program funding and program boundaries must allow governments and funded organizations to take a multi-disciplinary approach to addressing people's needs'.<sup>75</sup>

The development of a National Affordable Housing Agreement provides an important opportunity to significantly increase the proportion of affordable housing in Australia. The Commonwealth Minister for Housing has indicated that the agreement will contain all Government housing and homelessness subsidies and assistance. The Prime Minister has indicated that it will bring together 'all housing assistance programs'. It appears, therefore, that the Agreement will include the following programs:

- Base funding for public and community housing;
- The National Rental Affordability Scheme;
- The First Home Owners Grant;
- Funding for crisis accommodation services (currently SAAP);
- Capital funding for crisis accommodation services (currently CAP);
- Aboriginal Rental Housing Program (ARHP); and
- Commonwealth Rent Assistance.

Other programs may be regarded as National Partnership Programs and contained in separate agreements, including funding for Indigenous housing and infrastructure for remote areas and funding for additional houses for the homeless under 'A Place to Call Home'. It is not clear under which funding framework the Housing Affordability Fund, the First Home Saver Accounts and housing tax concessions will be contained.

There is a need for greater clarity around the interaction between homelessness programs and funding and these, and other, affordable housing initiatives. The NAHA should include principles which reflect the national homelessness strategy and should provide a mechanism for achievement of the goals and targets identified in the strategy and the broader social inclusion agenda. In addition to principles relating to the reduction of homelessness, as suggested above, principles related to increasing the proportion of affordable housing and reducing the proportion of lower income households in housing

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<sup>75</sup> Green Paper at 58.

stress should also be included. Some principles related to the standard of housing should also be included, for example, minimum guidelines related to size of dwelling, accessibility, energy efficiency, location and proximity to employment opportunities and services and security of tenure. ACOSS recommends that the principles and outcomes to be included in the NAHA be determined in consultation with key stakeholders and emphasise affordability and access for lower income households.

The Government has committed to the development of a Compact with the community service and welfare sector to complement its social inclusion and national reform agendas. Compacts generally include key commitments related to the viability of the sector such as funding formulas, workforce issues, insurance and indexation as well as providing a framework for dialogue to occur between the parties. It is hoped that the Compact might provide a structure within which to achieve the simplification of administration and contractual arrangements, appropriate pay and conditions for community sector employees and an appropriate level of indexation which reflects the costs of service delivery. Reforms to the way that homeless services are funded must take into account the fact that many services receive funding from a number of different funding programs and agencies. The impact of reforms on these funding programs and the need to reduce the complexity of funding arrangements should be considered in the development of a national homelessness strategy and the NAHA.

Open and effective dialogue between the Government and the community and welfare sector will be critical during the process of reforms to Commonwealth/State funding agreements and it is hoped that the Compact will provide a framework for the implementation of these reforms. In turn, the NAHA should reflect the principles of improved partnerships, consistent treatment of community organisations and increased mutual understanding and respect which typically underpin compacts between Government and the sector. Given these key links, it is essential that the National Strategy, the NAHA and the Compact are developed so as to be consistent and complementary.

Finally, peak representative bodies play a key role in facilitating dialogue between the Government and the community sector. They must be adequately resourced during the reform and implementation process to broadly consult with the sector, engage the sector in the reform process, coordinate the sector's responses to issues arising and provide policy input to Government.

#### **4. The expansion of effective prevention and early intervention programs**

ACOSS advocates for an expansion of existing, effective homelessness prevention and early intervention programs including HOME Advice and Reconnect.

The HOME Advice program is an early intervention program which assists families who are experiencing difficulties in maintaining tenancies or home ownership as a result of difficult personal or financial circumstances. The program operates through partnerships between Centrelink HOME Advice social workers and HOME Advice workers in the community sector. The program has achieved some very positive outcomes, as highlighted in the Green Paper. Significantly, the program has played a role in preventing homelessness, with 92% of families assisted avoiding homelessness and remaining in their own home or improved housing. The program currently operates from eight pilot sites around the country. In our 2008-2009 Budget Priority Statement, ACOSS called for an extension of the HOME

Advice program nationwide and to other income support recipients at risk of homelessness due to financial difficulty. We estimated this would involve a cost of \$75 million in the first year.

The Reconnect program is an early intervention program which facilitates family reconciliation for young people between 12-18 years of age and their families using community based intervention services. The program has also been evaluated positively, with success in supporting young people to remain in stable accommodation and avoid homelessness. At present, it is only able to assist approximately 6,000 young people each year, less than half of the youth population experiencing or at risk of homelessness. The program should be expanded to meet existing need, and enhance prevention and early intervention for young people at risk.

**5. The enhancement of homelessness support services to enable services to meet existing need, provide longer term and post-crisis support and to increase case management and service brokering capacity.**

The strengths of the SAAP service system were explored above, as were its limitations. As a critical part of the homelessness service system, funding for crisis accommodation providers must be maintained and increased. The current demand for crisis accommodation is high and cannot be met within existing funding levels. At present, 55% of those requesting immediate accommodation do not receive it on any given day.<sup>76</sup> Any shift in the national response to homelessness must ensure an adequate level of crisis accommodation to meet demand. It should also ensure flexibility in the provision of services to respond to the different needs of urban, regional, rural and remote areas. It is noted that the Green Paper has little emphasis on the needs and service infrastructure in non-urban areas.

The proposed shift in the Green Paper towards early intervention, prevention and post-crisis support is welcome and necessary but will be gradual and expensive. It will require substantial additional investment in public and community housing and the development of systems for the identification of those at risk of homelessness within social security, housing and health systems. In the meantime, the demand for crisis accommodation will continue and it is imperative that the homelessness sector is adequately resourced to provide this support. A reconsideration of the role of homelessness crisis accommodation providers cannot take place until the results of early intervention policies and the expansion of exit options become clear and demand for crisis support services decreases. Until such time, there is no justification for any diminution or re-direction of resources for crisis accommodation.

The Green Paper acknowledges the unique role that crisis accommodation services are equipped to play in linking clients with a range of other social services. The SAAP IV Evaluation Report concluded, 'homeless people seeking to change their situation should not have to negotiate a range of providers to obtain appropriate support.'<sup>77</sup> For these reasons, the linking and brokerage role of SAAP must be enhanced. Evaluations of SAAP services suggest that crisis accommodation services remain best placed to:

- provide a brokerage role between services and systems;
- identify those who are experiencing homelessness;

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<sup>76</sup> SAAP IV Evaluation Report at 93.

<sup>77</sup> At 63.

- address the immediate needs of those experiencing or at risk of homelessness; and
- develop relationships of trust and case management approaches with clients.

The SAAP IV Evaluation also highlighted the differential personal, social and economic outcomes achieved for clients related to the length of SAAP support period. It is clear that the longer clients are supported for, the more likely it is that positive outcomes will be achieved in employment, health and accommodation. ACOSS therefore rejects the proposal that SAAP services should be restricted to providing crisis accommodation (for the duration of a 'crisis period' only) even in the event that the mainstream service response is significantly enhanced. Rather, funding should be directed to expanding post-crisis support models, which enable services to flexibly respond to the needs of clients, without being restricted by narrow time limits on the length of service periods.

The Green Paper notes that 'funding constraints have limited the ability of organisations to offer employment packages necessary to attract and retain specialist staff to provide quality services for clients with complex needs'. The issues of staff attraction and retention occur across the community sector, with the most recent Australian Community Sector Survey revealing that 64% of respondent agencies had experienced difficulty attracting qualified staff in the past year.<sup>78</sup> If the SAAP sector is to play an expanded role in case management and brokering, services will need to be funded adequately to attract staff with the relevant skills and provide ongoing staff training and development.

ACOSS welcomed the Government's allocation of \$150 million to fund the construction of 600 new homes for those experiencing homelessness. This investment in capital needs to be further expanded to enable crisis accommodation providers to meet existing need and to provide longer term support. Funds should be sufficient to enable services to meet existing need and provide appropriate, comfortable and safe living environments for clients which are disability accessible and provide adequate privacy. It is clear that the existing level of CAP funding is not adequate and has not increased sufficiently to offset the increased costs of construction or maintenance. We suggest that an infrastructure fund for community homelessness services could address this shortfall.

In 2005-06, SAAP assisted 106,500 clients and 54,700 accompanying children.<sup>79</sup> However, under the current system, children are not recognised as clients and services do not receive funding to provide for children as clients in their own right. Reforms to the homelessness service system must ensure that funding is available to provide adequate and appropriate accommodation and support services to children accompanying adults in crisis accommodation services. Given the vulnerability of these children, and the previous trauma and anxiety they are likely to have experienced, this should form part of the Government's commitment to investing in early childhood.

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<sup>78</sup> At pg 20.

<sup>79</sup> AIHW, *Australia's Welfare 2007* at 262.

In light of the above discussion, ACOSS advocates for the enhancement of the current crisis accommodation service system through additional funding to:

- enable services to meet existing demand;
- expand the role of crisis accommodation providers as service brokers and case managers;
- enable crisis accommodation services to provide longer term support;
- improve workforce pay and conditions;
- support construction and maintenance of facilities; and
- provide assistance to children as clients of crisis accommodation services in their own right.