NCOSS Submission to the Discussion Paper:

Foundations for Change - Homelessness in NSW

4 November 2016

ncoss
NSW Council of Social Service

About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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Executive Summary

The NSW Council of Social Service (NCOSS) welcomes the development of a Homelessness Strategy for NSW. This will fill the strategic policy vacuum left since the expiry of the Homelessness Action Plan and will help to connect and strengthen existing efforts aimed at increasing housing supply and addressing homelessness.

This submission provides the NCOSS response to the Discussion Paper *Foundations for Change – Homelessness in NSW*.

We believe eliminating homelessness is not too ambitious a goal, and we need targets towards this goal developed in consultation with the community and sector.

Our submission makes recommendations and comments that advocate for increasing supply, funding innovation and new ways of working and improving existing systems, products and services.

Our proposals on increasing new supply include:

- increasing supply by extending the Social and Affordable Housing Fund to deliver 5000 additional units of social and affordable housing;
- enabling inclusionary zoning, promoting secondary dwellings and increasing Housing First models; and
- investing in a Social and Affordable Housing (SAHF) Readiness Program to build the capacity of Aboriginal Organisations to be active partners in the future production of social and affordable housing.

Our proposals on promoting innovation and new ways of working include:

- investing in innovative housing and share accommodation models including a medium-term youth housing and education program, building on the *Foyer* model and *Homeshare;*
- investing in an *Innovative Collaboration Fund* aimed at seeding funding of local collaboration initiatives linked to homelessness reduction targets;
- developing alternative and more localised models of Temporary Accommodation (TA);
- funding a 5-year trial of the Community of Schools and Services (COSS) approach (also known as the Geelong project) in locations in NSW with high homelessness risk;
- investigating the development of a holistic cross-agency supporting people program aimed at providing care co-ordination, capacity building and support to vulnerable people with multiple needs; and
- investing in a homelessness planning and coordination initiative that expands and builds on the work of the District Homelessness Implementation Groups.

Our proposals on improving existing systems, products and services include:

- improving cross-agency exit planning and increasing exit housing options, prioritising Aboriginal people and young people leaving care;
- reviewing the legislation/regulation under which tenancy databases (eg. TICA) operate to ensure tenants are not unfairly listed and for longer than necessary;
- improving access to private rental assistance through clearer information and pathways;

- implementing a system wide approach using an agreed risk measurement tool to allow people at risk to be identified early and linked to support to prevent their homelessness;
- strengthening tenancy support programs that help people at risk of homelessness to sustain their tenancies in public and private housing;
- providing more training to embed Trauma Informed Care (TIC) in service delivery and to better understand the dynamics and impacts of domestic and family violence (DFV);
- embedding client engagement in program design, service contracts and quality monitoring systems and actively monitor the level of client engagement and satisfaction;
- investing in a co-ordinated homelessness data development, evaluation and research agenda to be delivered jointly with leading academics and the sector;
- recognising the intersections between high risk groups and balancing the need for specialist responses for specific client groups with holistic responses that address such intersections; and
- adding families living in poverty and people who identify as LGBTI as higher risk groups in addition to those already listed in the *Discussion Paper*.

Summary of recommendations

Recommendation 1:
Add to the three proposed outcomes in the Discussion Paper the intent to create a dynamic and collaborative homelessness system that can respond early to prevent and eliminate homelessness in the long term and revise the second outcome to include 'access and sustain' adequate and secure places to live.

Recommendation 2:
Include in the Homelessness Strategy bold, long-term targets developed in consultation with the community and sector that over time contribute to ending homelessness.

Recommendation 3:
Extend the Social and Affordable Housing Fund to deliver 5000 additional social and affordable housing units targeting the state's most disadvantaged communities.

Recommendation 4:
Expand the number of Local Government Areas (LGAs) that are identified in the *State Environmental Planning Policy (SEPP) 70 — Affordable Housing* to allow LGAs in areas of high affordability stress to implement inclusionary zoning.

Recommendation 5:
Investigate the cost benefits of providing incentives to increase secondary dwelling developments in areas with very short affordable housing supply.

Recommendation 6:

Review the legislation/regulation under which tenancy databases (eg. TICA) operate and audit them regularly to ensure tenants are not unfairly listed and apply fines to real estate agents found to be in breach.

Recommendation 7:
Develop alternative and more localised models of Temporary Accommodation (TA) and make TA more flexible and streamlined to access.

Recommendation 8:
Improve access to private rental assistance through more connected delivery, clearer information and stronger people-focused processing of applications.

Recommendation 9:

Continue to support and grow models such as The Collective and other local collaborative work to harness corporate and community engagement in preventing and addressing homelessness.

Recommendation 10:
Invest in the development of an 'adapted' *Homeshare* model and operating framework for trialing in NSW.

Recommendation 11:
Develop and implement a cross agency framework with CEO-level agreement to ensure good practice exits out of institutional settings and delivery against a 'no exits into homelessness' commitment.

Recommendation 12:
Increase Housing First options through additional public and social housing supply and head leasing.

Recommendation 13:
Prioritise exit strategies for Aboriginal people leaving custody through improved social housing policies and procedures and collaboration between Corrective Services and FACS.

Recommendation 14:
Increase suitable accommodation options for DFV perpetrators and better manage their exit planning to protect victims.

Recommendation 15:
Implement early collaborative exit planning with young people in out-of-home care (OOHC) to ensure they do not abruptly leave their care arrangement into unsafe situations that put them at risk of homelessness.

Recommendation 16:
Invest in a medium term youth housing and education program, building on the Foyer model. NCOSS proposes undertaking a formal trial in a number of locations in NSW linked to a monitoring and evaluation strategy to track client outcomes.

Recommendation 17:
Systematically apply the social procurement requirements in the NSW Procurement Policy Framework by highlighting this requirement in tender specifications and evaluation criteria.

Recommendation 18:
Implement a system-wide approach using an agreed risk measurement tool to allow people at risk to be identified early and linked to support to prevent their homelessness.

Recommendation 19:
Fund a 5-year trial of the Community of Schools and Services (COSS) approach (also known as the Geelong project) in NSW locations with high homelessness risk.

Recommendation 20:
Jointly develop - between Department of Family and Community Services (FACS)-Housing NSW, Community Housing Providers (CHPs) and Specialist Homelessness Services (SHS) - cross-agency tenancy support practice guidelines to strengthen tenancy support programs that help people at risk of homelessness sustain their tenancies in public and private housing.

Recommendation 21:
Investigate the development of a holistic cross-agency *Supporting People Program* aimed at providing care co-ordination, capacity building and support to vulnerable people with multiple needs.

Recommendation 22:
Continue FACS investment in homelessness sector workforce development with more focus on training to embed Trauma Informed Care (TIC) in service delivery and to better understand the dynamics and impacts of DFV.

Recommendation 23:
Embed client engagement in program design, service contracts and quality monitoring systems and actively monitor the level of client engagement and satisfaction.

Recommendation 24:
Invest in a homelessness planning and coordination initiative that expands and builds on the work of the District Homelessness Implementation Groups.

Recommendation 25:
Invest in an Innovative Collaboration Fund aimed at seeding funding of local collaboration initiatives linked to homelessness reduction targets.

Recommendation 26:
Increase housing options and access to support services (as recommended above) as these are the key barriers to referring people who are homeless or at risk of homelessness.

Recommendation 27:
Invest in a coordinated homelessness data development, evaluation and research agenda to be delivered jointly with leading academics and the sector.

Recommendation 28:

Recognise in the homelessness strategy the intersections between high-risk groups and balance the need for specialist responses for specific client groups with holistic responses that address the links between different needs and circumstances.

Recommendation 29:

Invest $3 million over two years in a Social and Affordable Housing (SAHF) Readiness Program to build the capacity of Aboriginal Organisations to be active partners in the future production of social and affordable housing.

Recommendation 30:

In addition to higher risk groups identified in the paper, NCOSS recommends also focusing on families experiencing poverty and people who identify as LGBTI.

1. Introduction

With more than 28,000 people homeless per night, 60,000 families waiting to be housed and with Sydney and regional NSW being the least affordable metropolitan and regional areas in Australia, a homelessness strategy is more urgent than ever.

NCOSS acknowledges NSW Government efforts to transform the current social housing system in order to break the cycle of disadvantage as articulated in its recent housing strategy: Future Directions for Social Housing in NSW. This Strategy, as well as the establishment of the Social and Affordable Housing Fund (SAHF), the transfer of more social housing properties to community housing management and discussions on planning reform including inclusionary zoning provide a strong foundation for a new homelessness strategy aimed at preventing and reducing homelessness.

There is also significant human service system reform in NSW that we can build on, learn from and influence to embed homelessness as a complex problem requiring cross-agency integration and response.

This is a good start. However, the seriousness of the housing affordability and homelessness problem in NSW requires it to be prioritised at a whole-of-government level and in partnership with the sector to deliver a holistic, connected and more innovative approach.

We are committed to continuing to work in partnership with the NSW Government, the homelessness and community housing sectors, the private sector, our broader NGO members and the community to make this happen.

This response has been informed by feedback from a group of peak bodies and service providers through a consultation held in Sydney on 17 October 2016 as well as follow-up phone discussions with some regional and other members.

2. Proposed strategy intent and outcomes

The Foundations for Change Discussion Paper proposes the following three outcomes:

- Fewer people experience homelessness
- People in NSW find adequate and secure places to live and individual needs are assessed to ensure socially and culturally appropriate outcomes
- People are empowered and to tackle the underlying issues that put them at risk of homelessness

Recommendation 1:

Add to the three proposed outcomes in the Discussion Paper the intent to create a dynamic and collaborative homelessness system that can respond early to prevent and eliminate homelessness in the long term and revise the second outcome to include 'access and sustain' adequate and secure places to live.

Comments:

Homelessness is a complex problem caused by a number of social, economic and environmental factors. For this reason, preventing and ending homelessness needs a web of interdependent strategies and collaborations across all sectors.

NCOSS supports the intent of a Homelessness Strategy to 'create a framework for collective action across all levels of government, non-government sectors and the community'. This was also a strong focus of the Homelessness Action Plan that delivered good outcomes but due to a 'project based' approach, did not result in sustainable system-wide change.

We believe the focus of this Homelessness Strategy should be on bringing about the systemic change and collective action needed to prevent and end homelessness. We also propose stronger language around accessing and sustaining adequate and secure places to live, not just finding secure places to live.

3. Proposed strategy approach

The Discussion Paper proposes strengthening the efficiency and effectiveness of services across the homeless spectrum (including prevention, early intervention and crisis response). It identifies nine areas of future opportunities that are outlined and discussed below (sections 4-12).

Recommendation 2:

Include in the Homelessness Strategy bold, long-term targets developed in consultation with the community and sector that over time contribute to ending homelessness.

Comments:

While NCOSS broadly supports the approach proposed in the Discussion Paper, we believe a Homelessness Strategy needs to provide stronger direction and targets towards achieving sustained and serious reductions in homelessness.

Significantly reducing and even eliminating homelessness is possible but needs a strong, dynamic and collective approach which should include:

- long term targets and clear system and client outcomes, developed in consultation with the community and the sector;

- cross-agency planning, investment and interventions linked to accountability measures to ensure mainstream services are part of the homelessness solution;
- sustainable funding streams to promote long-term planning, service stability and collaboration;

- a system that has a broader range of housing and support options to cater for different levels and duration of need; and
- a focus on poverty as a key driver of homelessness that can only be addressed through more social and affordable housing.

4. Fit for purpose pathways into housing

Accommodation for all those seeking it. If this was achieved there would be a more stable community with less housing stress triggering a number of other issues.

View expressed by a regional organisation

NCOSS supports the future opportunities outlined in the paper to create better pathways into housing, including, increasing supply, boosting private rental assistance, increasing access to housing by rough sleepers, Housing First models and housing options for victims of domestic and family violence (DFV).

NCOSS has had an ongoing concern about the reducing supply of affordable housing in NSW and has consistently advocated for more affordable and social housing. In our 2017/18 Pre-Budget Submission,[1] we argued that the housing affordability crisis will get much worse unless we take concrete steps to address it now. We need to continue and strengthen effort and investment in increasing the supply of affordable housing.

Social and Affordable Housing Fund

Recommendation 3:

Extend the Social and Affordable Housing Fund to deliver 5000 additional social and affordable housing units targeting the state's most disadvantaged communities.

Comments:

A home makes everything else possible. Education, training, employment, health, and safety all rest on the stability of having a place to call home. In NSW, 43.3% of low-income households are in rental stress (where rent accounts for 30% or more of a low-income household's expenses). The situation is even worse in Sydney where 54.4% of low-income households are in rental stress, and 50.4% of households receiving Commonwealth Rent Assistance (CRA) continue to experience rental stress despite this assistance[2]. It is no surprise then that housing

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1 NCOSS (2016), Investing in Communities: NCOSS 2017/18 Pre-Budget Submission, Sydney.

2 SCRGSP (Steering Committee for the Review of Government Service Provision), Report on Government Services 2016, vol. G, Housing and Homelessness, Productivity Commission, Canberra, Table GA.29, p.1.

and homelessness consistently ranked as the number one priority at Sydney and Regional consultations NCOSS recently held to inform its Pre-Budget Submission.

The SAHF was launched in January 2016 providing $1.1 billion to invest in new social and affordable housing stock to support vulnerable people. In May 2016, a total of nine parties were short listed to develop detailed proposals to tap into the fund to deliver 3000 additional social and affordable housing homes.

NCOSS has recently released a positioning paper[3] - SAHF Phase 2 NCOSS Position Paper which further develops our pre-budget submission recommendation to extend the SAHF to deliver 5000 additional social and affordable housing units targeting the state's most disadvantaged communities. Please refer to this paper for more detail.

Inclusionary zoning

Recommendation 4:

Expand the number of Local Government Areas (LGAs) that are identified in the *State Environmental Planning Policy (SEPP) 70 — Affordable Housing* to allow LGAs in areas of high affordability stress to implement inclusionary zoning.

Comments:

While the housing development boom in NSW is resulting in an increase in supply, most of this new supply is not affordable. A key mechanism for increasing affordable housing supply in new developments is inclusionary zoning. This means requiring a developer contribution, usually in the form of a proportion of affordable housing units to be included in all major residential developments and redevelopments. This planning approach has contributed to increasing affordable housing supply in many parts of the world including 200 cities in the US, London and Amsterdam. London has developments with a 40-50% target.

In NSW, we have the legislative framework to allow inclusionary zoning to be implemented; however the policy that gives effect to the legislation (SEPP 70) must name the Local Councils able to implement such an approach. To date, only two have been named in the policy – City of Sydney and Willoughby. As Shelter NSW notes;

> *We have had a situation for the last 15 years where NSW planning law allows consent authorities to require developer contributions for affordable housing in circumstances, and some few local schemes were introduced on this basis, but attempts by other councils to introduce similar schemes were thwarted.*[4]

NCOSS supports the push for inclusionary zoning by Shelter NSW and others including the Social Panel of the Greater Sydney Commission, Sydney Alliance, Federation of Community Housing Associations and Mission Australia. Inclusionary zoning needs to be one of a suite of policy, planning and funding tools to increase the supply of affordable housing.

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3 NCOSS (2016) Social and Affordable Housing Fund 2 – Positioning Paper.

4 Shelter NSW (2015), Fact Sheet - What Is Inclusionary Zoning?

Secondary dwellings

Recommendation 5:

Investigate the cost benefits of providing incentives to increase secondary dwelling developments in areas with very low affordable housing supply.

Comments:

Secondary dwellings are by nature affordable due to their size and location within a larger dwelling, providing an additional avenue for growing affordable housing supply.

While this type of 'granny flat' housing is not suitable for some homeless people with complex and high support needs, it can be a good option for some single people, older women and small families living in poverty. Some local Councils encourage secondary dwelling development through the waiving of development fees, but more could be done to encourage this kind of development.

NCOSS proposes that the NSW Government investigate the cost benefits of offering a financial grant/incentive to property owners who agree to develop a secondary dwelling on the condition that it is managed by a Community Housing Provider (CHP) for an agreed period of time. The CHP would need to be part of the decision-making process around the suitability of the property and its location and agree to take on its management before the incentive is approved.

Regulate tenancy database such as TICA

Recommendation 6:

Review the legislation/regulation under which tenancy databases (eg. TICA) operate and audit them regularly to ensure tenants are not unfairly listed and apply fines to real estate agents found to be in breach.

Comments:

The tenancy databases, such as TICA, were raised as a major barrier to people accessing private rental properties. These databases are poorly regulated and create an unfair playing field, putting the onus on tenants to fight to be removed if they believe their listing is inaccurate or unjust.

There are also barriers for some client groups to accessing private rentals due to discrimination. Groups vulnerable to discrimination in the private market, including Aboriginal people, young people and people from culturally and linguistically diverse (CALD) communities are particularly disadvantaged by these tenancy databases. While this is a serious issue, discrimination coupled with an increasingly competitive rental market play a part in increasing some people's risk of homelessness. For example, one stakeholder gave an example of a young person applying for 100 rental properties and still being unable to secure one.

> *Aboriginal people are discriminated against in their access to private rental. Sometimes they are placed on TICA and find it hard to get off the list… need to regulate TICA.*
>
> *View expressed by an Aboriginal SHS provider*

Develop alternative and more flexible models of Temporary Accommodation

Recommendation 7:
Develop alternative and more localised models of Temporary Accommodation (TA) and make TA more flexible and streamlined to access.

Comments:
Temporary Accommodation is a necessary response for people who are homeless and in crisis. Our stakeholders raised concerns about the program's inflexibility and lack of local focus. There was a view that the program's focus on hotel and motel accommodation sometimes misses other local emergency accommodation opportunities that may be more suitable and cost effective. A more local approach to providing temporary accommodation can also help link people in need to support and housing assistance sooner and reduce the proportion of clients who access TA but never turn up to the housing office for a housing assistance assessment.

One of our stakeholders suggested looking at the viability of using vacant Government accommodation for key workers (such as Education and Police) and developing local arrangements for accessing this accommodation when it is not in use by officers of these agencies.

Our stakeholders also suggested that Specialist Homelessness Services (SHS) should have 'look-up' access to *Housing Pathways* to allow them to check the housing application and TA assistance status of their clients. One provider referred to the lack of access as a 'log jam' — as the SHS have to rely on the Department or the CHP to check the TA assistance and housing application status of their client. This causes unnecessary delays and frustration for clients already under stress. Introducing on-line applications may rectify this problem and would allow the SHS to help their clients to look up their housing assistance and application status.

There is a need to continue to improve access to TA through streamlined practice, innovation and more flexible policy. NCOSS proposes that FACS consider alternative and more localised models for the delivery of temporary and emergency accommodation. There is also a need for clear processes for CHPs and SHS so that clients do not become more stressed through confusion of what evidence they have to provide, where, and when by.

Improve access to private rental assistance

Recommendation 8:
Improve access to private rental assistance through more connected delivery, clearer information and stronger people-focused processing of applications.

Comments:
While NSW has a comprehensive range of private rent assistance products and services, these are fragmented and delivered as individual products and services and are often disconnected from early intervention support services.

NCOSS believes that the delivery of private rental assistance should be reviewed to consider options for a stronger role for the non-government sector, especially CHPs and SHS, a more flexible and person-centred approach and better connections between housing assistance and support.

The Homebase[5] model in New York is one possible model to look at and learn from. This model combines a focus on identifying people at risk of homelessness and providing a range of wrap around support and financial assistance to help them access and sustain private rental. This holistic service provides:

- services to prevent eviction;
- assistance obtaining public benefits;
- emergency rental assistance;
- education and job placement assistance;
- financial counselling and money management;
- help relocating; and
- short-term financial assistance.

While FACS and CHPs already deliver some of these services and SHS deliver others, there is a need for models that better connect all services to ensure a holistic and seamless experience for clients.

Access to private rental assistance can also be improved through more user friendly and connected communication. The Queensland RentConnect[6] service was cited as a good example of how the NSW private rent assistance products could be better communicated to users.

A high level of competition for rental properties means that clients often have to work quickly to secure a property. Stakeholders noted the time taken to process an application for products such as Start Safely, Tenancy Guarantee and the Private Rental Subsidy is sometimes slow due to lack of staff.

5. Community and corporate engagement

NCOSS supports the principle of harnessing community and corporate engagement to prevent and reduce homelessness as a complementary strategy to government funded programs and services. We believe there are a great deal of resources in the community that can be harnessed and also that community voices can hold valuable solutions to a complex problem.

Our stakeholders said corporate and community contributions should be in addition to government funding and should complement current initiatives instead of duplicating services. Importantly, it was suggested that contributions would need to be strategic and evidence-based so that effective and targeted initiatives are funded/supported as opposed to what may be "on-trend" or "new and exciting" at the time. This could be

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5 Homebase New York accessed at: http://www1.nyc.gov/site/dhs/prevention/homebase.page

6 More information about RentConnect can be accessed at: https://www.qld.gov.au/housing/renting/rentconnect/

achieved by educating corporates to better inform them prior to investments and providing opportunities for them to work in conjunction with Specialist Homelessness Services.

The Collective

Recommendation 9:

Continue to support and grow models such as The Collective and other local collaborative work to harness corporate and community engagement in preventing and addressing homelessness.

Comments:

A model that has demonstrated success in tackling complex social problems (of which homelessness is one) is collective impact. Premised on the Collective Impact framework for collaboration, The Collective was launched by FACS in 2014 and in 2016 NCOSS led the successful tender to transition the model out of government. The Collective aims to transform the way we work to support the most vulnerable and break the cycle of disadvantage by bringing resources, tools, partnerships, capacity and capability that empowers local communities working together in genuinely collaborative ways, taking action to solve their own problems, and reducing dependence on government. NCOSS is focused on promoting evidence-based good practice to develop a sustainable model for collaborative engagement and action for the future.

Our stakeholders also supported the Social Impact Investment model as it has the potential to bring together capital and expertise from the public, private and not-for-profit sectors to achieve a social objective. One of the challenges of this model is access to good quality and specific data that enables different data sources to be linked to inform outcome measurement.

Homeshare

Recommendation 10:

Invest in the development of an 'adapted' *Homeshare* model and operating framework for trialing in NSW.

Comments:
NCOSS supports harnessing untapped community resources to contribute to addressing homelessness. One of these resources is under-occupied people's homes and the other is the support and help people can offer others. The *Homeshare* model brings both of these resources together. It is a 'program that brings together older householders or younger householders with a disability who could benefit from help in the home and companionship, with mature people of integrity prepared to lend a hand in return for affordable accommodation'[7]. *Homeshare* has been operating in a number of countries and other Australian jurisdictions, especially in Victoria with Parramatta Council in the process of investigating the feasibility of this model in its city.[8]

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7 Homeshare Australia Website accessed on 25/10/16 at: http://www.homeshare.org.au/

8 A background paper on Homeshare prepared by Youth Action provides more background, http://www.youthaction.org.au/homeshare2015

NCOSS proposes that the NSW Government invest in the development of an 'adapted' Homeshare model and operating framework for trialing in NSW. Subject to the outcome of the research and development phase, NCOSS proposes trialing this model in six NSW locations ahead of a state-wide roll out if it proves successful. The project would:

- examine lessons learned from existing trials and evaluations;
- develop an adapted model suitable for the NSW context;
- develop a financial model to assess the feasibility of a self-sustaining model after three years;
- identify risks and develop a risk management plan;
- develop referral and access procedures and protocols (including policy and working with children checks, complaints mechanisms and conflict resolution);
- develop an 'App' that enables people to register for the *Homeshare* service and manage their transactions seamlessly and easily;
- identify SHS, CHPs, local council and Government agency partners to participate in the trials; and
- undertake the trial along with active monitoring and evaluation.

6.   Better exit planning

A policy of no exits into homelessness

Recommendation 11:

Develop and implement a cross agency framework with CEO-level agreement to ensure good practice exits out of institutional settings and delivery against a 'no exits into homelessness' commitment.

Comments:

Exits into homelessness continue to be a major downfall of the service system contributing to homelessness. Our stakeholders cited many examples of this system failure. For example, a woman who was exited from a mental health unit at 3pm in the afternoon without shoes and with nowhere to go or a correctional facility contacting the SHS the day of a prisoner's release asking them to find housing and provide the new address for the prisoner on the same day.   Despite a great deal of cross-agency effort and past funding through the National Partnership Agreement on Homelessness, a system-wide approach to prevent exits into homelessness has not been achieved.

Our stakeholders argued that we need a policy that binds government and non-government organisations to a commitment that no one will be exited into homelessness. The policy would define exit planning principles, roles and responsibilities, and would promote collaboration and monitoring of client exit outcomes.

An effective exit planning approach should include starting the planning process early, having true collaboration between services, helping people to find and apply for housing as part of exit planning; clearly defining lines of

responsibility. Effective exit planning also means ensuring people are exiting into housing that is fit for purpose and accessible to jobs, services and support when needed.

Housing First

Recommendation 12:

Increase Housing First options through additional public and social housing supply and head leasing.

Comments:

Our stakeholders told us about the desperate shortage of suitable housing for people with complex needs because they can't find or afford private rental and need support to establish and sustain a tenancy.

Providing housing linked to long term support through '*Housing First'* models is an essential part of the exit housing response for some clients. The evidence supporting Housing First models is strong and has been well documented.

NCOSS proposes extending Housing First models to increase exit options for people with complex needs. Properties could be earmarked for Housing First models through public and community housing as well as through head leasing (for example by expanding Connect100) or through private rental subsidies. Longer-term case management and care co-ordination must be recognised as an integral part of preventing homelessness for some clients with complex needs.

Aboriginal people leaving custody

Recommendation 13:

Prioritise exit strategies for Aboriginal people leaving custody through improved social housing policies and procedures and collaboration between Corrective Services and FACS.

Comments:

Aboriginal people are significantly overrepresented in custody and in social housing. It is imperative that the two systems work together to ensure Aboriginal people do not fall into homelessness and/or reoffending.

Legal Aid's Aboriginal women leaving custody report[9] provides insight into the experience of Aboriginal women leaving custody and identifies strategies for improving social housing policies and procedures, and collaboration between Corrective Services and FACS to assist in preventing homelessness.

NCOSS proposes the development of a targeted strategy aimed at preventing Aboriginal people leaving custody from exiting into homelessness. This strategy should build on the evidence developed through the Aboriginal Women Leaving Custody project.

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9 Aboriginal Women Leaving Custody Report into Barriers to Housing, Legal Aid, October 2015

Domestic violence perpetrators

Recommendation 14:

Increase suitable accommodation options for DFV perpetrators and better manage their exit planning to protect victims.

Comments:

Perpetrators are often released from prison only to go straight back to the victim's house. This puts the victims – usually women and children — at further risk of violence. A system is needed where the victim is notified of the release early and where her risk is assessed and support provided to prevent exposure to further violence. The lack of perpetrator housing options perpetuates the cycle of abuse. Having better access to accommodation by perpetrators can support programs such as *Staying Home Leaving Violence.*

This was also raised as a concern, particularly in Aboriginal communities where there is nowhere for men to leave to. In one town, a property for a men's centre has been provided but it could not operate due to lack of funding and staff. This means that men who are intoxicated and prone to violence have nowhere to 'cool off' putting women and children at risk and forcing them to escape to the women's safe house.

Young people leaving care

Recommendation 15:

Implement early collaborative exit planning with young people in out-of-home care (OOHC) to ensure they do not abruptly leave their care arrangement into unsafe situations that put them at risk of homelessness.

Issue

Our stakeholders made a number of comments relating to young people exiting OOHC and suggested that this client group needs better access to social housing and more innovative and flexible housing options. NCOSS believes that support for young people leaving OOHC should in some ways mirror the access to support and mentoring that young people in the broader community have access to from family and other networks as they mature. These ongoing relationships assist young people to build a range of skills such as building skills to budget and rent in the private market. Potential solutions include facilitating a more gradual transition from OOHC with longer-term case management rather than a cut off at 18 years of age and utilising transitional housing models such as Foyer that include developing living skills while recognising trauma.

7. Education, training and employment

Participation in education, training and employment is a key to breaking the cycle of homelessness and facilitate independence. NCOSS supports the focus on empowering people through education, training and employment to prevent homelessness.

Youth Housing linked to education and training (Foyer model)

Recommendation 16:

Invest in a medium term youth housing and education program, building on the Foyer model. NCOSS proposes undertaking a formal trial in a number of locations in NSW linked to a monitoring and evaluation strategy to track client outcomes.

Comments:

More young people experience homelessness in NSW than in any other state or territory. New research has shown that the cost of youth homelessness across Australia is $626 million annually[10]. Preventing homelessness in the first place can significantly reduce this cost, as can an agile response with youth-appropriate housing when young people are already homeless.

The Foyer model was identified by our stakeholders as an effective approach in supporting and empowering young people to successfully transition to independence through a focus on education and training. A key feature of the Foyer model is linking appropriate, stable and affordable accommodation with supported access to employment, training and educational opportunities. While a traditional Foyer model co-locates services in a purpose-built facility, the approach has also been applied to other contexts, such as a central hub serving several accommodation services.

In the NSW context, a flexible approach to implementing a Foyer-like approach – guided by local level planning and co-design processes – would facilitate opportunities to build on existing infrastructure, with the potential to establish new services where existing accommodation options are poor. To build a strong evidence base, NCOSS proposes developing a monitoring and evaluation strategy to ensure post-intervention client outcomes are tracked and documented.

Social procurement

Recommendation 17:

Systematically apply the social procurement requirements in the NSW Procurement Policy Framework by highlighting this requirement in tender specifications and evaluation criteria.

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10 Mackenzie, D., et al (2016) The Cost of Youth Homelessness in Australia, Swinburne University, University of Western Australia, Charles Sturt University.

Comments:

Innovative models that promote training and employment opportunities for people who are homeless, or at risk of homelessness, should be encouraged. Social procurement involves a buyer strategically using their procurement to require successful tenderers to deliver social outcomes. For example, a local government could require that successful tenderers employ a percentage of their labour force from the local unemployed population. This approach should be used more strongly as a mechanism to promote the training and employment opportunities of people who are homeless and at risk of homelessness.

The NSW Procurement Policy Framework for Government Agencies has a sustainable procurement objective, which includes a social procurement requirement. This requirement needs to be more systematically applied by highlighting this requirement in tender specifications and evaluation criteria. More public transparency about the social procurement activities of successful tenders is also needed to facilitate partnerships with the not-for-profit sector.

8. Early intervention and prevention

NCOSS agrees with embedding early intervention and prevention in the service system that houses and supports people who are homeless or at risk. This must be tackled at every level in the homelessness service continuum and embraced by all agencies working with people who are at risk of becoming homeless or homeless again.

There is now a great deal of evidence that preventing homelessness has not only social benefits but cost benefits as well. For example an AHURI research report found that:

> *Persons at risk of homelessness are heavy users of health, justice and welfare services, as well as being more likely to have children placed in out-of-home care and experience eviction from a public tenancy. This higher than population use of non- homelessness services represents both a cost to government and a potential cost savings to government where support is provided to prevent homelessness.*[11]

NCOSS acknowledges the shift that has occurred in NSW through the Homelessness Action Plan initiatives and Specialist Homelessness Services to increase the focus on prevention and early intervention. There is a great deal of good practice that we can build on such as tenancy support programs, rapid rehousing responses, innovative outreach and brokerage models.

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11 Zaretzky, K, et al. (2013), The cost of homelessness and the net benefit of homelessness programs: a national study, Australian Housing and Urban Research Institute, p7.

Identifying homelessness risk

Recommendation 18:

Implement a system-wide approach using an agreed risk measurement tool to allow people at risk to be identified early and linked to support to prevent their homelessness.

Comments:

There is a need for a system-wide approach using an agreed risk measurement tool to allow people at risk to be identified early and linked to support to prevent their homelessness. Housing providers, real estate agents, schools, correctional facilities, health services, social and community services, Centrelink and other agencies all have a role to play in identifying people who are at risk of homelessness. Cross agency information sharing would facilitate the identification of people at risk of becoming homeless.

We heard from our stakeholders about examples of close collaboration between housing providers and specialist homelessness services to identify and address homelessness risk. The challenges are a lack of specialist staff in Housing NSW and other agencies so proactive strategies can be employed to identify and support people who may fall into homelessness.

Focus on young people

Recommendation 19:

Fund a 5-year trial of the Community of Schools and Services (COSS) approach (also known as the Geelong project) in NSW locations with high homelessness risk.

Comments:

We need to start early to prevent the social, emotional and health impacts and costs associated with homelessness. In addition, the less time a young person is homeless, the less susceptible they are to a range of negative outcomes. In areas where the risk of homelessness is significant, population-screening measures are appropriate. Where a young person is identified as being at risk, needs-based, comprehensive and flexible support must be available to the young person and their family. Strong linkages between different parts of the service system are critical in facilitating effective early intervention.

A school-based collective impact model that is proving promising is the 'community of schools and services' or COSS approach being developed in Victoria, New South Wales and South Australia. As Mackenzie notes this approach is:

'a promising, more robust and integrated place-based 'collective impact' reform of support for vulnerable youth and families. About half of the young adults, who experience homelessness, have had their first experiences of homelessness while they were much younger. Identifying risk during secondary school and supporting the at-risk cohort on a community-wide basis through secondary school and

beyond is a systemic strategy that is premised on local system reform to reduce homelessness as well as early school leaving or other associated adverse outcomes'.[12]

The Geelong Project is one such COSS response to young people at risk of homelessness. It uses a place-based integrated coalition of schools and youth agencies that engage in early intervention activities.

Defining characteristics of the Geelong Project include population screening for risk via a short survey completed by every secondary student with results matched against school identified at-risk students. At-risk students are then engaged with the Project via a follow-up screening interview. The Project also includes tailored support, appropriate to the level of need and an intentional approach of 'collaboration' involving inter-agency agreements. For example, in Geelong, an e-wellbeing IT platform is being built to facilitate the efficient tracking of young people at risk of homelessness within and between agencies.

In NSW, two projects based on The Geelong Project have commenced in Ryde and the Northern Beaches in Sydney.

The Geelong Project is estimated to cost $5.4 million over two years, with $4.1 million identified and committed locally, and the State Government asked to contribute the remaining $1.3 million.[13]

The other important priority group was children and early teens at risk, especially those with a history of abuse or neglect and those in OOHC. Our stakeholders emphasised the importance of intervening early with programs needed to support children as young as 8 years old. The Homeless Youth Assistance Program was seen as a positive step as is Youth Hope and Reconnect. The problem is that these programs are disjointed creating confusions and overlaps.

Schools were also viewed as having a very important role. The newly established school network co-ordinators were seen as an important link between the school system and homelessness and housing services. They are in a good position to work with teachers and counsellors to identity homelessness issues.

Tenancy support

Recommendation 20:

Jointly develop - between Department of Family and Community Services (FACS)-Housing NSW, Community Housing Providers (CHPs) and Specialist Homelessness Services (SHS) - cross-agency tenancy support practice guidelines to strengthen tenancy support programs that help people at risk of homelessness sustain their tenancies in public and private housing.

Comments:

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12 Mackenzie, D., et al (2016) *The Cost of Youth Homelessness in Australia*, Swinburne University, University of Western Australia, Charles Sturt University.

13 http://www.thegeelongproject.com.au/wp-content/uploads/2014/09/2014-09-ExecSummary_A4_v21.pdf

To prevent homelessness, we need to help people at risk of homelessness to sustain their tenancies - both social and private. This includes preventing evictions from social housing and private rentals; and exits into homelessness from corrections, health and mental health facilities.

Evictions from public housing were seen as a major issue by some of the services we consulted. There was recognition that FACS-Housing NSW is making a big effort in some districts to collaborate with other agencies around identifying and preventing evictions. However, this often comes with an expectation that a referral would be made to the SHS to provide the support needed to prevent the eviction. While most SHS do fulfil such a prevention and early intervention role, they often do not have sufficient resources to assist the number of clients or the complexity of needs being referred to them.

FACS-Housing NSW, CHPs and SHS have implemented various models of collaboration to help identify tenants at risk and work with them to sustain their tenancies. Some of the private rental assistance products also help tenants to sustain tenancies at risk.

What is needed is a systemic and collaborative approach with agreed evidence-based risk indicators to help identify tenants at risk. NCOSS proposes that FACS-Housing NSW, CHPs and SHS work jointly to develop cross-agency tenancy support practice guidelines. The guidelines should be based on the experience of these agencies as well as on the evidence, including the evaluation of tenancy support programs which were funded under the National Partnership Agreement on Homelessness.

9. People at the center

Holistic supporting people program

Recommendation 21:

Investigate the development of a holistic cross-agency *Supporting People Program* aimed at providing care co-ordination, capacity building and support to vulnerable people with multiple needs.

Comments:

Homelessness is caused by many factors usually underpinned by poverty and often combined with other issues such as mental illness and trauma, substance abuse and domestic and family violence. A person-centered approach is key to catering for diverse needs and circumstances.

We support the focus on a person-centered approach to preventing and addressing homelessness and agree with the future directions proposed in the Discussion Paper. However, we believe that programmatic barriers will continue as long as we have a 'silo' approach to budgeting and program design.

A key gap in the service system is a holistic cross-agency Supporting People Program focusing on supporting vulnerable people in the community with multiple needs. While there is a myriad of support programs targeting

different needs, many people fall below the eligibility threshold for these services because their need is related to multiple factors rather than the severity of one factor.

Workers on the ground still have difficulties securing access to mainstream services for their clients with complex and multiple needs. Access to mental health services is a persistent issue with particular barriers for people who have mild to moderate mental health conditions due to limited access to care-coordination.

As funding programs have become more targeted to specific outcomes, generalist and holistic forms of support have been largely lost from the funded service system. For example, people with a disability will need to meet the disability threshold in order to qualify for funding under the National Disability Insurance Scheme and people with mild to moderate mental illness have limited access to care-coordination through mental health services.

What is needed is a pooling of resources to create a substantial cross-agency Supporting People Program that includes care co-ordination, capacity building and support that enables people to live independently. This program would target people with multiple needs through cross agency referral and care co-ordination. Such services do exist in some Neighbourhood Centres and other community services but are not funded or connected through a coherent and widespread supporting people program.

Sector development

Recommendation 22:

Continue FACS investment in homelessness sector workforce development with more focus on training to embed Trauma Informed Care (TIC) in service delivery and to better understand the dynamics and impacts of DFV.

Comments:

Our stakeholders also identified the need to continue to invest in workforce development in the homelessness service sector. Some stakeholders noted the need of support for workers to debrief and receive advice on appropriate pathways and ensure that employment contracts recognise trauma support and counselling as a legitimate leave requirement.

More training is needed to embed Trauma Informed Care (TIC) in service delivery and to better understand the dynamics and impacts of DFV. Service contracts need to recognise that TIC takes longer, is more resource-intensive and needs to be funded accordingly.

Client participation

Recommendation 23:

Embed client engagement in program design, service contracts and quality monitoring systems and actively monitor the level of client engagement and satisfaction.

Comments:

Client participation is fundamental to an effective approach that centres on people. The voices of homeless people and people who are at risk of homelessness must be heard in the process of developing, implementing and monitoring the homelessness strategy and related initiatives. A future homelessness strategy must not only emphasise the importance of client engagement and embed it in program design, service contracts and quality monitoring systems but also actively monitor the level of client engagement and satisfaction. Actively engaging consumers takes time and resources and needs to be promoted through tools and training.

10. Strengthen collaboration

NCOSS agrees that there is a need to strengthen collaboration between the range of agencies that have a role in preventing and addressing homelessness. We particularly support the focus on holistic programs, local leadership and innovative collaboration models, improving case coordination to leverage resources from mainstream services, and improving information sharing arrangements.

State-wide implementation of a Homelessness Planning and Coordination Initiative

Recommendation 24:

Invest in a homelessness planning and coordination initiative that expands and builds on the work of the District Homelessness Implementation Groups.

Comments:

An effective response to homelessness requires input from multiple parts of the service system, however, in practice creating the linkages necessary for different parts of the system to work well together is difficult.

Coordination must be intentional, it must be systematic and it must be resourced. Not only do coordinated responses result in better outcomes, but they also help ensure existing resources are used to best effect.

We recommend the NSW Government invest in a model similar to the Homelessness Planning and Coordination Initiative. This initiative, funded under the Queensland Implementation Plan for the National Partnership Agreement on Homelessness, was effective in bringing together a range of stakeholders at the regional level, creating a more coordinated response to homelessness and increasing the effectiveness of new and existing investment.

In NSW, a number of homelessness co-ordination initiatives were trialed under the Homelessness Action Plan with good results. The District Homelessness Implementation Groups (DHIG) have also played an important role in coordinating local system reform and planning.

The proposed Homelessness Planning and Coordination Initiative should build on and expand the DHIGs to include a more sustainable partnership approach supported by funded coordinators, engagement by mainstream agencies and an ongoing focus on homelessness planning informed by consultation and evidence.

Innovative collaboration

Recommendation 25:

Invest in an Innovative Collaboration Fund aimed at seeding funding of local collaboration initiatives linked to homelessness reduction targets.

Comments:

Our stakeholders noted that collaboration should not be synonymous with consortia and formal partnerships. There is also a need to acknowledge that collaboration can be costly and rely on relationships that take time to build and can be difficult to build in a competitive tender environment. Trust is also seen as important. There was concern that while collaboration produces multiple benefits, small organisations that hold expertise are struggling to meet the demand because of resource constraints.

The difficulty of collaborating across disciplines was also raised with issues relating to the use of different definitions, levels of resources and objectives. Some examples included NSW Health and Housing NSW using different definitions of 'crisis', varied levels of tolerance of challenging behaviour.

Stakeholders mentioned the Uniting Way Collective Impact project - 90 Homes for 90 Lives - as an example of such an innovative collaboration approach. It involved a coalition of seven core partners (key corporate, government, community and philanthropic stakeholders) and focused on outcomes for rough sleepers, with collaboration instead of duplication a key aim. Those sleeping rough were consulted on their needs (in many cases for the first time) and a proven 'Housing First' model that secured rapid housing placement was proposed. Supported by a strong cost-benefit analysis and backed by the key stakeholders, the initiative secured government support and funding for permanent housing of rough sleepers in Woolloomooloo.[14]

Another example of innovative collaboration action to address homelessness is the 100000Homes campaign in the United States[15]. In 2010 a [community based movement](#) set itself a target of housing 100,000 chronic and veteran homeless people in targeted communities in the United States. Through locally driven solutions, measures, collaboration and funding, the campaign exceeded its target by housing more than 105,000 people. This campaign has now been extended to a target of [Zero by the end of 2016](#).

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[14] Uniting Way, 90Homes:90Lives, accessed at: http://unitedway.com.au/our-work/collective-impact/90homes90lives

[15] 100000Homes, accessed at: http://100khomes.org/blog/ending-homelessness-is-possible-now-lets-get-it-done

11. Referral pathways and processes

Recommendation 26:

Increase housing options and access to support services (as recommended above) as these are the key barriers to referring people who are homeless or at risk of homelessness.

Comments:

Effective referral pathways must be enabled by not only robust referral practices and systems but also by having housing and support options for people in need. This is often the biggest barrier to an effective referral system. As discussed earlier, increasing supply and strengthening holistic support and cross-agency collaboration will help remove blockages in the system for people who are homeless or at risk.

In addition, agreed measures of homelessness risk that are shared by homelessness and mainstream services are needed to ensure people at risk are identified, referred and assisted as early as possible.

Referral pathways linked to resourced cross agency case co-ordination has proven to work. For example, under Safer Pathways high risk victims of DFV can be identified and have their housing and safety risk met in a short period of time. While this is a resource intensive approach, our stakeholders suggested looking at this approach for other high-risk clients, for example people with complex and multiple needs.

Our stakeholder also suggested that in order to better understand referral pathways, mapping should be conducted relating to who is missing out on services and why as well as more training for mainstream services in identifying and referring homeless people. Solid and accessible information about local homelessness services is fundamental to facilitate this referral approach.

12. Use of data to improve services

Recommendation 27:

Invest in a coordinated homelessness data development, evaluation and research agenda to be delivered jointly with leading academics and the sector.

Comments:

Quality, timely and accessible data is a foundation for planning, research and evaluation. NCOSS welcomes improvements to SHS client data management and the development of a Human Services Outcomes Framework. We support the proposed focus on changing data collected by mainstream services to include data on risk factors and pathways into and out of homelessness. We also welcome opportunities to improve data sharing and better use of the evidence base to increase understanding of homelessness and its impacts.

Effective homelessness policy and service responses need to rely on accurate data and research drawing from a range of policy expertise, both domestically and internationally in a coordinated approach. A number of peak bodies and other organisations and foundations undertake and commission research. However, there is a need for a strong central point to co-ordinate a homelessness data development and research agenda.

A data development and research agenda should identify and link different data sets to help build a picture of the full experience of homeless people and the longer-term outcomes and benefits of different programs and interventions. Data linkage and a longer term research agenda will help to build on longitudinal research such as *Journeys Home*. While there was some concern from our stakeholders about the privacy risk of data storage and linkage, on balance data and data linkage was seen as key to homelessness research and evaluation.

Evaluation of services and programs is also important to ensure we are investing resources where they have the best chance of addressing and preventing homelessness. A coordinated approach can link data collection and linkage, evaluation and research to build a strong evidence base and a picture of progress towards preventing and eliminating homelessness.

Our stakeholders also argued that communities and services on the ground must have access to source data and research that is easy-to-digest, in order to facilitate their participation in planning, co-design and innovation. They suggested that Client Information Management System (CIMS) data and reports need to be more accessible and user friendly.

13. Higher risk groups

Recognising multiple and diverse needs

Recommendation 28:

Recognise in the homelessness strategy the intersections between high-risk groups and balance the need for specialist responses for specific client groups with holistic responses that address the links between different needs and circumstances.

Comments:

An effective homelessness service system recognises that homeless people are diverse with different levels of need and reasons for their homelessness. The matrix below[16] provides one lens for understanding the different levels of homelessness need. This approach recognises that some people will require long term and maybe permanent housing assistance and support—while others will need shorter-term interventions.

An effective homelessness service system responds to diverse needs through a person-centered response and by having a range of housing and support options available to meet different needs.

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[16] Calgary Homeless Foundation *(2015), Calgary's Updated Plan to End Homelessness: People First in Housing First.*
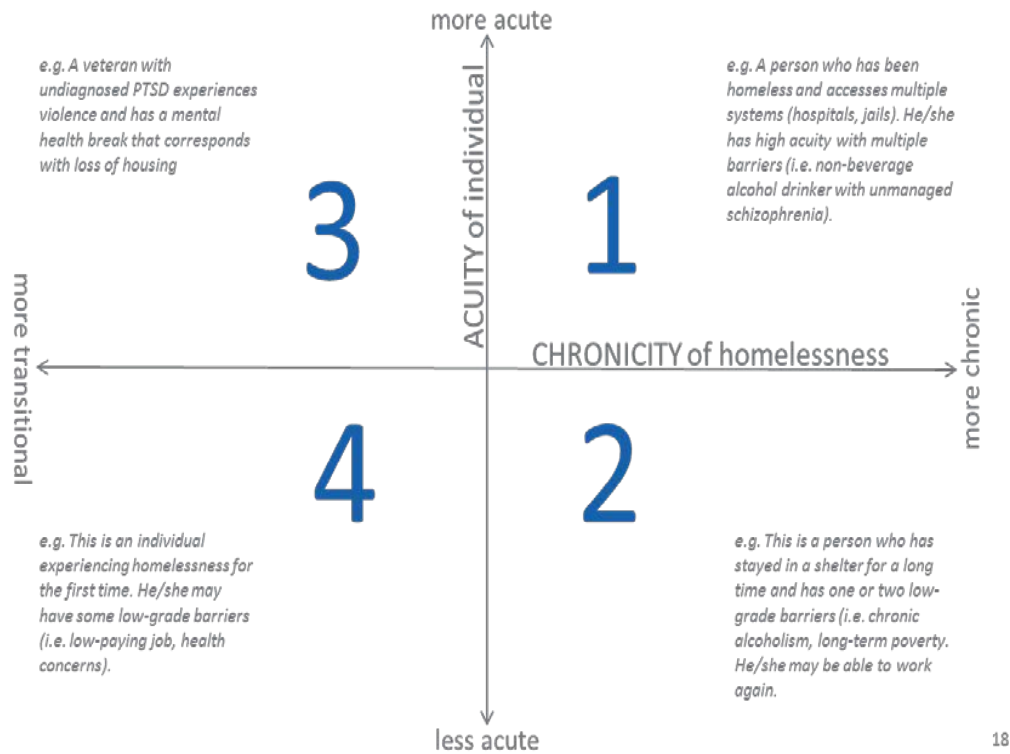
Source: Calgary Homeless Foundation *(2015), Calgary's Updated Plan to End Homelessness: People First in Housing First.*

Our stakeholders noted that there is a great deal of cross over between groups at higher risk of homelessness. For example, a young person may be a victim of domestic and family violence, be chronically homeless, Aboriginal or CALD, have a mental illness and have a disability. A future homelessness service system must recognise and have capacity to address such intersections.

Aboriginal communities

Recommendation 29:

Invest $3 million over two years in a Social and Affordable Housing (SAHF) Readiness Program to build the capacity of Aboriginal Organisations to be active partners in the future production of social and affordable housing.

Issue:

The significant overrepresentation of Aboriginal people in the homelessness population and in homelessness services points to a chronic failure in the system for Aboriginal people. While NCOSS agrees that this is a symptom of broader socio-economic disadvantage among Aboriginal communities, we believe that housing provides a springboard for dealing with broader disadvantage.

The extent of housing stress in Aboriginal communities is well known. Indigenous Australians are over-represented in the homeless population. In NSW, there are 127.6 Indigenous homeless people per 10,000 population compared to 36.7 for the non-indigenous population.[17] During 2014-15 SHS supported 11,925 Aboriginal people representing about 25% of all SHS clients[18.]

In addition, Indigenous Australians are ten times more likely to be homeless, approximately half as likely to be home owners and twice as likely to be renters. Over a third of the Indigenous population is reliant on social housing[19]. Poor housing conditions and overcrowding are also prevalent in Indigenous communities.

Overcrowding was of particular concern for our stakeholders because this often places more than one family at risk of homelessness. They argued we need a housing system that better understands and adapts to changing household configurations and large extended families. We need flexible and innovative housing models that work for Aboriginal people, developed jointly with input from Aboriginal people.

NSWALC and Local Aboriginal Land Councils are major land-owners in NSW and seek to engage in partnerships to produce social and affordable housing stock for Aboriginal people and the broader community. With investment, there are huge opportunities to leverage land to produce affordable and social housing that works for Aboriginal people and to also create employment and training opportunities for Aboriginal people in the process.

Given the significant level of housing stress and homelessness among Aboriginal communities, NCOSS proposes proactive and targeted strategies to increase housing supply that is appropriate for Aboriginal people. With the SAHF now operating to generate stock, there is a need to ensure that one of the largest land-holders in our State is positioned to take advantage of the opportunities it presents. While this is not yet the case—it can be.

NCOSS has prepared a paper proposing that the NSW Government invest $3 million over two years in a SAHF Readiness Program to build the capacity of Aboriginal Organisations to be active partners in the future production of social and affordable housing.

In order to maximise the value of capacity building activities through an aggregated approach, this funding should be channeled through a single, Aboriginal-controlled organisation that has the expertise required.

Additional higher risk groups that need to be prioritised

Recommendation 30:

In addition to higher risk groups identified in the paper, NCOSS recommends also focusing on families experiencing poverty and people who identify as LGBTI.

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[17] Australian Institute of Health and Welfare (2014), Homelessness among Indigenous Australians, p13.
[18] Family and Community Services (2016), Foundation for Change Homelessness in NSW.
[19] Moran et al (2016) *Indigenous lifeworlds, conditionality and housing outcomes*, Australian Housing and Urban Research Institute.

Issue

NCOSS agrees that the groups identified in the Discussion Paper have higher homelessness risks and should be prioritised in homelessness interventions. We support a focus on children and young people, victims of family and domestic violence, Aboriginal people, older women, rough sleepers and the chronically homeless, people with mental illness, people with disability, people leaving prison, CALD communities and veterans. In addition, NCOSS points to a gap in the paper around LGBTI communities and families experiencing poverty.

Our stakeholders identified families experiencing poverty and people who identify as LGBTI as additional higher risk groups that should be addressed in the homelessness strategy.

According to the 2010 ABS General Social Survey, 1 in 6 (17%) of households with children aged 0–14 could not raise $2,000 in a week for something important, and almost one-third (29%) had one or more cash flow problems in the previous year. One-parent families were more likely to be under financial stress than couple-parent families[20]. Rising housing and utility prices, put many families at risk of homelessness. Between 2012 and 2015, 78,000 homes had their electricity disconnected because they could not afford to pay their bills.

LGBTI people have an increased risk of depression and anxiety, substance abuse, self-harming and suicidal thoughts which are some of the key risk factors for homelessness. In addition, many LGBTI people, especially young people, find themselves homeless due to family conflict and rejection. They can also face discrimination in the housing market and have difficulties accessing services that cater for their particulate needs.

General comments about higher risk groups identified in the paper

- A future homelessness strategy must prioritise children and young people in OOHC and prevent their pathway into homelessness. As indicated above, better and earlier exit planning is and suitable housing models are parts of the solution. Other parts of the solution include having innovative tenancy and housing models that are suitable for children and young people and these must include a focus on reconnecting with family where the family environment is safe and constructive.

I come across some interesting connection between foster children turning 18 and then the homelessness rate of 18-25 year olds. [This] suggests that there is a disjunction between [being in a] supported environment and then ceased support.

View expressed by an Aboriginal organisation

- One of the policy and practice barriers identified by our stakeholders related to young people under the age of 18 accessing social housing. While the policy enables these young people to apply for housing assistance, in practice they are told to wait until they are 18 before they can apply and be placed on the

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[20] Australian Institute of Health and Welfare, cited at: http://www.aihw.gov.au/child-health/families-and-communities/#economic

housing register. This is particularly problematic for young people leaving OOHC and impacts on early exit planning.

- For victims of DFV the referral pathways, allocation policies, co-ordination support and exit strategies are just as important as the housing itself. One stakeholder noted the importance of housing models that connected to *Safer Pathways* and respected women's choices when they reject locations they feel are too close to the perpetrator or his networks. As discussed above, there is a need for accommodation options for perpetrators of DFV with access to behaviour change programs.

- Older women continue to be a growing cohort of people at higher risk of homeless. A recent Mercy Foundation report[21] found there is 'recognition of demographic changes with increasing numbers of older people living in poverty, as well as the ageing of the homeless population but this is not resulting in attention to older people's homelessness'. Older women who are homeless or at risk of homelessness may have had chronic homelessness for years and are now ageing, but the largest proportion of older women presenting with housing crisis in Australia have led conventional lives, and rented whilst working and raising a family. Few have had involvement with welfare and support systems. The report suggests that a rapid rehousing approach can help these older women to continue to lead independent lives. The challenge is in having supply of affordable housing that is accessible to services and support. A range of housing solutions are needed, three of the recommendations made above related to secondary dwellings, *Homeshare* and Housing First would be appropriate for older women depending on the duration of housing assistance and depth of support needed.

- Rough sleepers and the chronic homeless are often hard to reach. Some Local Councils and other organisations have been going beyond counting the homeless and assessing the risks and needs of rough sleepers and the chronic homeless through surveys using the Vulnerability Index- Service Prioritisation Decision Assistance Tool (VI-SPDAT). A State-wide view of the experience and needs of rough sleepers and the chronic homeless is also needed to understand inner city drift and to develop responses that can more effectively prevent homelessness.

- Mental illness and mental health issues can put people at risk of homelessness especially when combined with poverty and lack of family support. Access to timely mental health support and counselling services has long been an issue for people who are homeless and at risk of homelessness.   There is a particular gap in the system for people who have low to moderate mental health issues as they are below the severity threshold to be prioritised by mental health services. In addition to counselling and mental health services, they often need help to navigate the service system through a care coordinator or caseworker.

- People with disability are increasing in the community due to advances in medicine and longer life expectancy. The National Disability Insurance Scheme is putting more emphasis on independent living and client choice. The foundation to an effective community-based disability service model is having access to suitable, adaptable and affordable housing. Yet the supply of affordable housing that is accessible in the private market is limited and the wait for social housing can be long in some locations, even for people with

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[21] Institute of Social Science Research (2014), *Older Women's Pathways out of Homelessness sin Australia*, University of Queensland, Australia.

disability. A range of housing options and partnerships between disability service providers and housing providers is needed to facilitate innovative housing developments and options.

- People leaving prison are of significant risk of homelessness not only due to the transition itself but also due to discrimination in accessing private rental accommodation and due to the risk of reoffending. As discussed above, better exit planning is an important step towards preventing homelessness. Other strategies could also include undertaking *Rent It Keep It* training while in prison and providing access to post-release support.

- CALD communities are diverse in their migration and settlement experience, language backgrounds and homelessness risk. One of our stakeholders suggested that CALD issues are not transparent or dealt with adequately in the homelessness service system. Stakeholders talked about the gap in the system for women escaping DFV who have no income due to their visa status. They tend to 'get stuck' in crisis or transitional accommodation due to lack of alternative options.

- More information, research and planning is needed to better understand the homelessness risk experienced by veterans and to more effectively respond to that risk.   The 100000Homes initiatives discussed above targeted veterans and may offer some good practice to learn from.