

**Homelessness NSW**

A red graphic element consisting of a horizontal line that curves upwards and to the right, ending in a sharp point.

**Submission to the City of Sydney's 'Draft  
Homelessness Action Plan'**

**February 2020**

**About Homelessness NSW**

Homelessness NSW is a peak not for profit organisation that works with its 170 members to prevent and reduce homelessness across NSW. Our members include small, locally based community organisations, multiservice agencies with a regional reach and large State-wide service providers who work to address and prevent homelessness.

Key services that we provide include policy development and advocacy in working to end homelessness, public education about the changing faces of homeless people and those at risk, information about the diverse mix of initiatives operating in NSW and elsewhere and advice and support for member organisations and others about organisational change and improvement.

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## INTRODUCTION

Homelessness NSW welcomes the opportunity to provide feedback to the City of Sydney on the Draft Homelessness Action Plan. As the NSW state peak for homelessness services, we commend the Council's commitment to laying out a plan of action to reduce homelessness and its impacts in Sydney.

The City of Sydney council has proven to be a leader in addressing issues of housing and homelessness. The Council is a critical partner in the *Act to End Homelessness* initiative, has been instrumental in advocating on homelessness issues through the work of the Council of Capital City Lord Mayors, and is the only council in Australia with a designated team to work with people experiencing homelessness. Housing and homelessness is a key pillar of its strategic commitment to create a *Sustainable Sydney 2030*.

Homelessness NSW has held a long standing and an excellent working relationship with the City of Sydney, developing a range of projects together. Overall, while we are generally supportive of the principles and goals of the plan, we advise that without embedding in the plan concrete activities and corresponding measures, substantive progress to end homelessness in the City of Sydney won't occur. As it stands, the actions listed under each Strategic Priority area have limited tangible meaning. Through our feedback we make a number of suggestions and recommendations to support more specific activities.

It is clear that cities and inner areas of cities are dealing with a growth in homelessness. NSW has the highest rate of growth of homelessness across Australia, at over 37% from 2011 to 2016, and while this is impacting across the whole state there has been a significant increase in homelessness in urban centres.<sup>3</sup>

- 12,000 clients were provided with short term or crisis accommodation, but 14,000 were not able to access this due to services being full. Unmet need for crisis accommodation has more than quadrupled in the last 5 years.
- For inner city areas the 67 per cent of clients accessing services in major cities are the least likely to end up in stable housing.<sup>4</sup>

It's more important now than ever for City of Sydney to have the support of its partners in acting to respond to and reduce homelessness. Our recommendations respond to the context of homelessness in the inner city, including recommendations to increase funding to services to better meet demand, while at the same time taking steps to reduce homelessness.

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<sup>1</sup> Parkinson, S., Batterham, D., Reynolds, M. and Wood, G. (2019). *The Changing Geography of Homelessness: A Spatial Analysis from 2001 to 2016, AHURI Final Report 313*. Australian Housing and Urban Research Institute Limited: Melbourne.

<sup>2</sup> Council of Capital City Lord Mayors (2019). *Homelessness in Australian Capital Cities*. Retrieved from <https://www.lordmayors.org/wp-content/uploads/2019/10/Capital-Concern-Homelessness-in-Australian-Capital.pdf>

<sup>3</sup> Pawson, H., Parsell, C., Saunders, P., Hill, T., Liu, E. (2018). *Australian homelessness monitor 2018: full report*. Collingwood, VIC: Launch Housing, p.9. Retrieved from <[https://www.launchhousing.org.au/site/wp-content/uploads/2018/05/LaunchHousing\\_AHM2018\\_Report.pdf](https://www.launchhousing.org.au/site/wp-content/uploads/2018/05/LaunchHousing_AHM2018_Report.pdf)>

<sup>4</sup> Australian Institute of Health and Welfare (2019). *Specialist homelessness services annual report 2017–18*. Cat. no. HOU 299. Canberra: AIHW.

We note that the action plan isn't bound by an explicit time frame, although 2030 is implied in some of the indicators. As a long-term plan, it therefore appears to be too narrow in scope, and so our recommendations reflect the need for an action plan that responds to the full nature and extent of homelessness in the inner city, not just rough sleeping. This plan should also, then, include measurable outcomes that correspond with the intended lifespan of the plan, across the diverse range of homelessness that occurs within the City.

Our submission also looks to the other areas of work where the Council is making a considerable impact on homelessness, and advise an integrated approach, where this work is considered and included in the Homelessness Action Plan. This integration across – for example, domestic and family violence or support for young people or community development – council commitments and plans will also make apparent the gaps that need to be filled to ensure less peoples experience is invisible in our system responses.

A final overall comment is that the data used by the action plan is 5 years old, and without using more up to date data and research, it's likely that the action plan will miss the mark, such as responding to the shifts that have occurred in recent years such as reporting of, and service delivery for, domestic and family violence survivors.

Homelessness NSW does note that the limited consultation period has hindered our capacity to garner feedback from members and the sector it pertains to. As such our feedback itself is limited.

## RECOMMENDATIONS

**Recommendation 1:** Provide concrete actions and activities in the Homelessness Action Plan that demonstrate how the City of Sydney will implement the *Act to End Homelessness* and:

- reduce rough sleeping in the City of Sydney area by 25% by 2020
- reduce rough sleeping in the City of Sydney area by 50% by 2025
- work towards zero rough sleeping in the City of Sydney area by 2030.

**Recommendation 2:** Ensure supportive housing is both a guiding principle to, and the key means through which activities are achieved, to any strategy, plan or initiative that addresses homelessness. This could be followed by concrete commitment to:

- Increase funding to supportive housing and Housing First initiatives
- Grow the knowledge and expertise of practitioners to deliver Housing First in the City of Sydney
- Look at the City's planning role and how it can encourage development and implementation of supportive housing and Housing First initiatives.

**Recommendation 3:** Commit to specific activities to end homelessness for Aboriginal peoples in the Homelessness Action Plan. These could include, but not be limited to:

- Becoming a signatory to, and reporting against 'The Accord – Redressing Aboriginal Homelessness'
- Considering the application of the Council's own Reconciliation Action Plan against the Homelessness Action Plan. This could include placing measures in the Homelessness Action Plan regarding the cultural awareness training / intelligence training in order to increase the cultural safety of Aboriginal peoples experiencing homelessness in the Local Government Area (herein LGA). Another option would be to benchmark whether clients approached by a City of Sydney worker - who are homeless and identify as Aboriginal and Torres Strait Islander - feel culturally safe and understood
- Put in place activities that will achieve better management of culturally safe places, for example, the establishment of a program that provides culturally safe places for Aboriginal peoples experiencing or at risk of homeless to go to
- Include Aboriginal Identified positions in the Public Space Liaison Officers (PSLOs), and ensure management are culturally competent
- Include Aboriginal Identified positions in the Homelessness Unit
- Increase funding for Aboriginal Community Controlled Services and increase the number of services that are Aboriginal Community Controlled.

**Recommendation 4:** Update the Homelessness Action Plan vision statement to include 60,000 years of Aboriginal and Torres Strait Islander living cultures.

**Recommendation 5:** Amend the definition of homelessness to include cultural and spiritual dimensions of homelessness, or in include more detail in the section 'Homelessness in context'.

**Recommendation 6:** Commit to community development in the Homelessness Action Plan, include community development specific actions to end homelessness, and ensure the needs of those at risk of and experiencing homelessness are embedding in council community development plans.

**Recommendation 7:** Ensure the Action Plan reflects, gives due weight to, and therefore is able to respond to, the true extent and nature of homelessness in the inner city. This should include and be informed by current data and research regarding couch surfing, overcrowding, boarding houses, insecure tenures, exits from government institutions. amongst others.

**Recommendation 8:** Give priority to the interface between Domestic and Family Violence and homelessness, as well as the gendered nature of homelessness, in the Action plan. This should include the addition of specific activities to address; the consideration of other council work and its impact on reducing homelessness; and include in other plans that address domestic and family violence actions to support those at risk of and experiencing homelessness.

**Recommendation 9:** Include specific activities to address young people at risk of and experiencing homelessness; include other council work with young people and youth services and its impact on reducing homelessness; and include in other plans that address working with young people actions to support those at risk of and experiencing homelessness.

**Recommendation 10:** Explicitly include prevention and early intervention as an ongoing commitment in the section detailing the action plan. Prevention and early intervention should be supported with concrete activities, such as:

- Committing to the development of and advocacy to NSW government agencies of a 'no exits into homelessness' policy
- Increased funding for services that support young people at risk of homelessness
- Continue to advocate for effective services and systems that correspond with the key drivers and pathways into homelessness.
- Identification of community development activities, current and future, that will contribute to prevention and early intervention of homelessness.
- Identification of domestic and family violence plans, initiatives and activities that will contribute to reducing homelessness.

**Recommendation 11:** Undertake a services and system analysis to inform a coordinated, and locally unique, homelessness action plan.

**Recommendation 12:** Initiate a research partnership for a longitudinal study to understand the impact that post housing support makes in sustaining tenancies in the longer term for the City of Sydney LGA and develop a model of service for delivery.

**Recommendation 13:** Ensure those experiencing or at risk of homelessness as the primary concern is both a guiding principle to, and the key means through which activities are achieved, to any strategy, plan or initiative that addresses homelessness. This could be further achieved by, but not limited to, concrete actions such as:

- Ensuring Public Space Liaison Officers reflect the diversity of the community experiencing homelessness
- Sharing the expertise and experience gained by the City of Sydney's PSLO program with other LGAs.

**Recommendation 14:** Ensure the Homelessness Action Plan is informed by and has concrete activities to address the interface between child protection and homelessness. This should include the provision of appropriate services and advocacy.

## RESPONSE TO THE DRAFT HOMELESSNESS ACTION PLAN

### Act to End Homelessness

Homelessness NSW welcomed the announcement of the City of Sydney's 30-year commitment to ending homelessness, through its partnership with the Institute on Global Homelessness and the NSW Government, among others. The City of Sydney is a significant partner, and as such should be leading the plan for NSW to implement the partnership, including through the development of implementation activities at a local level, at the local government area, district and state-wide.

Such key initiatives should be part and parcel of this action plan rather than tangential and should be incorporated into specific activities and at all points across the plan.

**Recommendation 1:** Provide concrete actions and activities in the Homelessness Action Plan that demonstrate how the City of Sydney will implement the *Act to End Homelessness* and:

- reduce rough sleeping in the City of Sydney area by 25% by 2020
- reduce rough sleeping in the City of Sydney area by 50% by 2025
- work towards zero rough sleeping in the City of Sydney area by 2030

### Supportive housing

Any commitment to ending homelessness should be enacted through and underpinned by a supportive housing approach. Supportive Housing is a term used to encompass 'an array of service models that seek to integrate the provision of affordable ongoing housing and support to different target groups with varying strengths and vulnerabilities.'<sup>5</sup> There is a strong evidence base on the economic and social effectiveness of supportive housing models, as opposed to crisis and transitional housing models.<sup>6</sup>

We applaud the Council's investment in Housing First as noted on page 24, but also note there is no ongoing commitment to this as a principle and a way of working in the action plan, and would recommend that supportive housing is elevated above and beyond individual projects and becomes the guiding principle to the Action Plan, and is the means by which the Council enacts any plan or strategy to end homelessness.

The City of Sydney's commitment, profile and influence, particularly through the establishment of the *Act to End Homelessness* initiative presents an incredible juncture through which the Council can provide leadership to embed supportive housing as its foundation.

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<sup>5</sup> Parsell, C., Moutou, O., Lucio, E. and Parkinson, S. (2015). *Supportive housing to address homelessness*. AHURI Final Report No.240. Melbourne: Australian Housing and Urban Research Institute. Retrieved from: <[https://www.ahuri.edu.au/\\_data/assets/pdf\\_file/0008/2015/AHURI\\_Final\\_Report\\_No240\\_Supportive-housing-to-address-homelessness.pdf](https://www.ahuri.edu.au/_data/assets/pdf_file/0008/2015/AHURI_Final_Report_No240_Supportive-housing-to-address-homelessness.pdf)>

<sup>6</sup> See Parsell, C., and Moutou, O. (2014) *An evaluation of the nature and effectiveness of models of supportive housing*. Positioning Paper, Australian Housing and Urban Research Institute, Melbourne; Hannigan, T., and Wagner, S., (2003). *Developing the support in supportive housing: a guide to providing services in housing*. Corporation for Supportive Housing, New York; Johnson, G., Parkinson, S., and Parsell, C. (2012). *Policy shift or program drift? Implementing housing first in Australia*. Australian Housing and Urban Research Institute, Melbourne; Parsell, C., Jones, A., and Head, B. (2013). 'Policies and programmes to end homelessness in Australia: learning from international practice', *International Journal of Social Welfare*, vol.22, no.2, pp.186–194.

**Recommendation 2:** Ensure supportive housing is both a guiding principle to, and the key means through which activities are achieved, to any strategy, plan or initiative that addresses homelessness. This could be followed by concrete commitment to:

- Increase funding to supportive housing and Housing First initiatives.
- Grow the knowledge and expertise of practitioners to deliver Housing First in the City of Sydney.
- Look at the City's planning role and how it can encourage development and implementation of supportive housing and Housing First initiatives

### **A commitment to redressing homelessness for Aboriginal and Torres Strait Islander peoples**

Homelessness NSW welcomes the acknowledgement that prefaces the action plan, and we note the Council's achievements in working with Aboriginal people through its advisory group, principles of cooperation and its reconciliation action plan. Despite this there is no commitment in the action plan to redressing homelessness for Aboriginal and/or Torres Strait Islander peoples. This is a considerable gap given the persistent and harsh disparities that continue to exist as a result of colonisation, dispossession and ongoing intergenerational trauma of our nation's First Peoples.

Aboriginal and Torres Strait Islander peoples are over-represented in the homelessness population, as well as users presenting to Specialist Homelessness Services (SHS). Aboriginal and Torres Strait Islander peoples experience significantly higher rates of homelessness, overcrowded housing and insecure housing tenure. Despite comprising just 3.2% of the population<sup>7</sup>, Aboriginal peoples represented 26% of clients assisted by SHS, but in NSW this is even higher at 30%.<sup>8</sup> And again, for major cities, this increases once again, where Aboriginal peoples comprise 36% of those seeking services.<sup>9</sup> This is supported by the advice and information given to Homelessness NSW from services, who estimate inner city clientele represent between 30% to 40%. It should be noted that anecdotal evidence from services also indicate that the inner city is amid an influx of Aboriginal people experiencing homelessness, largely due to the scarcity of appropriate services in regional NSW. Services continue to experience high demand, above and beyond their capacity to meet it.

Key findings from the 2018-2019 report on Specialist Homelessness Services show the extent of the disparity:

- Aboriginal clients continue to increase by an average of 7% per year since 2011-2012, compared with 3% of the general population.
- Aboriginal people are 10 times more likely to use SHS than non-indigenous people, a rate that is increasing each year.
- It is impacting heavily upon children and young people. Over half (53%) of clients are under the age of 25, and 28% of Aboriginal clients are males aged 0 – 9 years of age.

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<sup>7</sup> ABS 2019. Australian demographic statistics, Mar 2019. ABS Cat. no. 3101.0. Canberra: ABS.

<sup>8</sup> Australian Institute of Health and Welfare. (2019). Specialist homelessness services 2018–19: New South Wales. Fact Sheet, Canberra: AIHW. Retrieved from <[https://www.aihw.gov.au/getmedia/fa0771c6-4a87-4740-b22f-f7546a0ca374/NSW\\_factsheet.pdf.aspx](https://www.aihw.gov.au/getmedia/fa0771c6-4a87-4740-b22f-f7546a0ca374/NSW_factsheet.pdf.aspx)>

<sup>9</sup> Australian Institute of Health and Welfare. (2019). Specialist Homelessness Services annual report 2018–19. Cat. no. HOU 318. Canberra: AIHW. Retrieved from <<https://www.aihw.gov.au/reports/homelessness-services/shs-annual-report-18-19>> and <<https://www.aihw.gov.au/reports/homelessness-services/shs-annual-report-18-19/contents/client-groups-of-interest/indigenous-clients>>

- Aboriginal children aged 0 – 14 are 8 times more likely to access SHSs than non-indigenous children.<sup>10</sup>

As a city that puts First Nations peoples first, we urge the City of Sydney to commit to specific activities to end homelessness for Aboriginal peoples in the Homelessness Action Plan. Without this accountability, transparency and monitoring, Aboriginal peoples will continue to be neglected and invisible in our work, and Aboriginal experiences of homelessness will increase

**Recommendation 3:** Commit to specific activities to end homelessness for Aboriginal peoples in the Homelessness Action Plan. These could include, but not be limited to:

- Becoming a signatory to, and reporting against ‘The Accord – Redressing Aboriginal Homelessness’<sup>11</sup>
- Considering the application of the Council’s own Reconciliation Action Plan against the Homelessness Action Plan. This could include placing measures in the Homelessness Action Plan regarding the cultural awareness training / intelligence training in order to increase the cultural safety of Aboriginal peoples experiencing homelessness in the Local Government Area (herein LGA). Another option would be to benchmark whether clients approached by a City of Sydney worker - who are homeless and identify as Aboriginal and Torres Strait Islander - feel culturally safe and understood
- Put in place activities that will achieve better management of culturally safe places, for example, the establishment of a program that provides culturally safe places for Aboriginal peoples experiencing or at risk of homeless to go to.
- Include Aboriginal Identified positions in the Public Space Liaison Officers (PSLOs), and ensure management are culturally competent.
- Include Aboriginal Identified positions in the Homelessness Unit
- Increase funding for Aboriginal Community Controlled Services and increase the number of services that are Aboriginal Community Controlled.

We also note that the Uluru Statement from the Heart states 60,000 years of Aboriginal and Torres Strait Islander history and culture, not 40,000. It is significant that Australia’s Aboriginal peoples are the world’s oldest living culture, it is a source of pride, and strength, and the full weight of this evidence should inform the action plan.

**Recommendation 4:** Update the Homelessness Action Plan vision statement to include 60,000 years of Aboriginal and Torres Strait Islander living cultures.

How the action plan understands and defines homelessness sets the agenda for how it is responded to. Homelessness NSW note that the definition of homelessness used in the action plan, and content where Aboriginal peoples might elsewhere be considered, is limited as it may not capture the cultural and spiritual dimensions of Aboriginal homelessness. For example, homelessness might be experienced by a

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<sup>10</sup> Australian Institute of Health and Welfare. (2019). *Australia's children*. Retrieved from <<https://www.aihw.gov.au/reports/children-youth/australias-children>>

<sup>11</sup> See < <https://www.shssectordev.org.au/projects/addressing-aboriginal-homelessness/redressing-aboriginal-homelessness-accord>> for more information

person by virtue of their removal from country, or inability for whatever reason to access their land or spiritual home.<sup>12</sup>

**Recommendation 5:** Amend the definition of homelessness to include cultural and spiritual dimensions of homelessness, or include more detail in the section 'Homelessness in context'.

### **Understanding and Defining Housing and Homelessness**

As aforementioned, how the action plan understands and defines homelessness sets the agenda for how it is responded to. In addition to enhancing the plan's cultural and spiritual dimensions of homelessness, it is important to note that what constitutes housing – or ending homelessness - is not just shelter but should include aspects of what constitutes a home. This is essential to ensuring services funded and supported by City of Sydney are equipped to undertake the full scope of work required to end homelessness, and support people into homes, including adequate levels and duration of support post being housed.

When looking at Strategic Priority 1, for example, it states that City of Sydney will “Invest in services that reduce the risk of people becoming homeless and break the cycle of homelessness.”, followed by a commitment to “Provide funding and/or other support to enhance delivery of services to reduce homelessness and rough sleeping in the inner city, including services that reduce the risk of people becoming homeless and break the cycle of homelessness”. There is little content under this action point to embed the development of community and belonging, and programs therefore associated with community development. This stems from a narrow concept of homelessness and housing at the front end of the plan, and no guiding principles ensuring a supportive housing approach.

The Action plan could draw from and reflect the City of Sydney's existing expertise in community development. The City of Sydney has long provided a range of community supports, including libraries, community centres amongst others. Community development activities and planning should be linked to the Homelessness Action Plan, and thus embedded in community development plans.

**Recommendation 6:** Commit to community development in the Homelessness Action Plan, include community development specific actions to end homelessness, and ensure the needs of those at risk of and experiencing homelessness are embedding in council community development plans.

The Action Plan has a heavy focus on rough sleeping, to the neglect of all other aspects of homelessness. Rough sleeping only accounts for 7% of those experiencing homelessness. Rough sleeping may be the most visible form of homelessness, but such a focus doesn't always ensure focusing on the most vulnerable, if this were the intent of the City of Sydney. Without articulating the diversity amongst the homelessness population, and the diverse experiences of homelessness then it follows that the range of approaches needed to respond (consultation, support pathways, services, information, housing options) won't be suitable for homelessness in the City of Sydney.

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<sup>12</sup> Anecdotal evidence provided to Homelessness NSW; AHURI. (2010). *Indigenous homelessness*. AHURI Research and Policy Bulletin. Issue 134, December 2010. Retrieved from:  
<[https://www.ahuri.edu.au/\\_data/assets/pdf\\_file/0018/3078/AHURI\\_RAP\\_Issue\\_134\\_Indigenous-homelessness.pdf](https://www.ahuri.edu.au/_data/assets/pdf_file/0018/3078/AHURI_RAP_Issue_134_Indigenous-homelessness.pdf)>

Domestic and Family Violence (DFV) is one of the leading causes of homelessness. In 2017-18, 42% of people seeking assistance from Specialist Homelessness Services were experiencing DFV.<sup>13</sup> Despite this, little weight is given in the action plan to the intersection between homelessness and domestic and family violence.

It is also well documented that women over 55 years are now the fastest growing homeless people in Australia. The number of older women in Australia who are experiencing, or at risk of homelessness has risen by 30% between 2011 and 2016.<sup>14</sup> DFV has been identified as a major risk factor for homelessness within this group of women.

The intersection between women who have been sexually abused, domestic and family violence and the incarceration of women is also well documented and so this needs to be considered when considering the needs of people exiting prison who may be at risk of homelessness.

The Homelessness Action Plan could better include evidence of the gendered experiences of homelessness, and have specific activities aiming to address them in the Strategic Priorities.<sup>15</sup>

As has been suggested, the City of Sydney is already working with different facets of DFV, through various plans, initiatives and activities and this work could inform the action plan and vice versa, for an integrated approach. Through considering the whole work of the Council, its various plans and activities, the gaps also become apparent and can be considered in either the Homelessness Action Plan, or in other work areas accordingly.

Along a similar vein, while there is some reference to young people as a vulnerable population, and in the prior preventative approach taken by council, the work of the council to support young people, including through youth specific services should be accounted for in the plan and Strategic Priorities. It is well understood that generalist youth services are working 'upstream' of specialist homelessness services and play an important role.

**Recommendation 7:** Ensure the Action Plan reflects, gives due weight to, and therefore is able to respond to, the true extent and nature of homelessness in the inner city. This should include and be informed by current data and research regarding couch surfing, overcrowding, boarding houses, insecure tenures, exits from government institutions. amongst others.

**Recommendation 8:** Give priority to the interface between Domestic and Family Violence and homelessness, as well as the gendered nature of homelessness, in the Action plan. This should include the addition of specific activities to address these aspects of homelessness; the consideration of other council work and its impact on reducing homelessness; and include in other plans addressing domestic and family violence those at risk of and experiencing homelessness.

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<sup>13</sup> Australian Institute of Health and Welfare, (2018), *Specialist Homelessness Services annual report 2017-18*, Canberra, AIHW.

<sup>14</sup> Australian Human Rights Commission (April 2019) *Older Women's Risk of Homelessness: Background Paper 2019*, Sydney, AHRC.

<sup>15</sup> Homelessness NSW thanks the advice and input of Domestic Violence NSW to our submission to the City of Sydney.

**Recommendation 9:** Include specific activities to address young people at risk of and experiencing homelessness; include other council work with young people and youth services and its impact on reducing homelessness; and include in other plans that address working with young people actions to support those at risk of and experiencing homelessness.

### **Prevention and Early Intervention**

The development of any strategy or action plan to address homelessness needs to ensure commitment and accountability from the broader service system and it needs to understand homelessness in the context of broader service system failure in supporting vulnerable and disadvantaged people.

While we support the prevention work that has been delivered by council, as noted in the section titled 'Our approach', the action plan itself has no ongoing commitment to prevention and early intervention.

Given the significance of the intersect between DFV and homelessness, primary prevention including violence prevention can play a vital role in preventing homelessness in the City and should be a key consideration for any prevention work as part of the Homelessness Action Plan. As aforementioned, the City of Sydney is already working with different facets of DFV, and this work could inform the action plan and vice versa, for an integrated approach

**Recommendation 10:** Explicitly include prevention and early intervention as an ongoing commitment in the section detailing the action plan. Prevention and early intervention should be supported with concrete activities, such as:

- Committing to the development of and advocacy to NSW government agencies of a 'no exits into homelessness' policy
- Increased funding for services that support young people at risk of homelessness
- Continue to advocate for effective services and systems that correspond with the key drivers and pathways into homelessness.
- Identification of community development activities, current and future, that will contribute to prevention and early intervention of homelessness.
- Identification of domestic and family violence plans, initiatives and activities that will contribute to reducing homelessness

### **Coordination and gap identification**

One of the key issues identified by Specialist Homelessness Services (SHS') when consulted by Homelessness NSW regarding barriers to effective service delivery to people at risk of or experiencing homelessness was the lack of a coordinated and comprehensive commitment by the broader service system in preventing and addressing homelessness.

In order to provide a tailored and effective locally based response that is unique to the needs and contexts of people experiencing homelessness in the City of Sydney, we would recommend that in addition to the Council's work to consult the sector, and to consult people with lived experience, that the plan is informed by a view of what is existing and what gaps need to be met. This could be done through overlaying the maps of existing systems, such as housing provision, service provision, specialist support provision and others.

As needs and gaps can change and shift, ideally this could include a projection of growth. It should cover broader issues and systems other than homelessness services and extend to those that impact on homelessness including availability of affordable housing, employment and demand for specialist

services such as mental health, drug and alcohol, domestic and family violence services and youth services.

We commend the Council's commitment to "Maintain a robust evidence base on the extent and nature of homelessness in the inner-city, to inform policy responses", but having the assessment inform the action plan would assist in the identification of tangible activities.

**Recommendation 11:** Undertake a services and system analysis to inform a coordinated, and locally unique homelessness action plan.

It has been suggested to Homelessness NSW that the effort to conduct research could be directed to a longitudinal study on the impact that post housing support makes in sustaining tenancies in the longer term. This would contribute to the Council's (and others) understanding what type of support has the greatest impact in determining the success of a tenancy, in turn informing the distribution of funding unique to the Local Government Area (LGA).

**Recommendation 12:** Initiate a research partnership for a longitudinal study to understand the impact that post housing support makes in sustaining tenancies in the longer term for the City of Sydney LGA and develop a model of service for delivery.

### **A person-centered approach**

Homelessness NSW is of the opinion that as an Action Plan to reduce homelessness, people experiencing homelessness should be the primary concern and beneficiary, and the plan should serve as the Council's commitment to those in the LGA who are at risk of or experience homelessness, first and foremost. This aspect could be strengthened.

We applaud the Council's commitment to ensuring people with lived experience participate in service design and delivery, as well as policy formation.

The provision of services and housing should be guided by the person experiencing homelessness' choice and need, and we recommend that this become a guiding principle of the Action Plan.

Headlined at Strategic Priority 2, number 6.1, the action plan states, "Coordinate responses between agencies for hot spot areas of rough sleeping, to maintain the amenity and safety of public spaces for all users." While it's true that the Council has responsibility to ensure the public domain is safe and accessible for all, the homelessness action plan should articulate the responsibility Council has to people experiencing homelessness and their access to the public domain. As it stands, it's hard to understand the intention of this point (No. 6.1) and how it places people experiencing homelessness, and their needs, first. This is critical because management of public spaces has a disproportionate impact on people experiencing homelessness, who rely on public space to conduct their day to day activities.

The City of Sydney is unique in that, unlike many other councils, it does have the internal resources and experience to work directly with people experiencing homelessness alongside its mandate to manage public space. This expertise should be leveraged to ensure that at the forefront of management of public spaces is the dignity and basic rights of people experiencing homelessness.

Important to this would be an acknowledgement of how public spaces and places are crucial to people experiencing and at risk of homelessness, including dimensions of the physical, social and cultural. In

many circumstances these are essentially the same as entering a person's home and working/accessing/being invited into their living room, family, or cultural space.

As mentioned in the Plan, the City of Sydney is a signatory to the NSW Protocol for homeless People in Public Places. The intention of the Protocol is to respect people experiencing homelessness' right to public space. How the City of Sydney actions this via Public Space Liaison Officers and other public space management persons and processes needs to be more clearly articulated in the plan.

This could include a taking a leadership role in the policing of people experiencing homelessness, to ensure that the interaction between Public Service Liaison Officers, the NSW Police and people experiencing homelessness is done so in a way that preserves and upholds the rights and dignity of people sleeping rough.

**Recommendation 13:** Ensure those experiencing or at risk of homelessness as the primary concern is both a guiding principle to, and the key means through which activities are achieved, to any strategy, plan or initiative that addresses homelessness. This could be further achieved by, but not limited to, concrete actions such as:

- Ensuring Public Space Liaison Officers reflect the diversity of the community experiencing homelessness
- Sharing the expertise and experience gained by the City of Sydney's PSLO program with other LGAs

### **Consider the implications child protection policy has on the experience of homelessness in the City of Sydney.**

The interface between Child Protection policy, and homelessness is significant, and of important to the action plan. Of adults who experience homelessness, research has shown some 40% have been involved with child protection authorities as a young person and experienced time in OOHC.<sup>16</sup> In NSW, 2,800 children and young people accessed SHS services and had a care and protection order, with the majority of those accessing services while on a care and protection services are doing so in major cities.<sup>17</sup> Data from the City of Sydney's connection week 2019 demonstrate that at least 21% of people surveyed having a history of child protection involvement. Above and beyond these numbers are the children and young people who should have received a child protection response, but do not due to limited resources and policy choices.

Some key policies areas for consideration, amongst many, are reforms that have resulted in a much more targeted basis of intervention and support, young people who self-place (i.e. leave a Department of Communities and Justice Out-of-Home care placement), as well as policies that aim to support young people to leave the Child Protection system.

It is very clear from a range of systems reviews, government policy statements, data sets, and through evidence provided from youth support services that young people at risk in NSW are not receiving a

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<sup>16</sup> Johnson, G. and Chamberlain, C. (2012) Evaluation of the Melbourne Street to Home program: Baseline Report and Johnson, G. and Chamberlain, C. (2008) From Youth to Adult Homelessness. *Australian Journal of Social Issues* Vol.43 No.4

<sup>17</sup> Australian Institute of Health and Welfare 2019. *Specialist Homelessness Services annual report 2018–19*. Cat. no. HOU 318. Canberra: AIHW. Retrieved from <<https://www.aihw.gov.au/reports/homelessness-services/shs-annual-report-18-19>>

sufficient systemic protective response or any support from the Department, and as a consequence many are leaving unsafe situations and presenting to Specialist Homelessness Services.

This situation has been documented in evidence to the United Nations Committee on the Rights of the Child, labelled as “buck-passing”. The 2011 Child Rights report stated ‘There is a lack of government attention to older children and adolescents. This is most evident in the “buck-passing” between community services and youth justice authorities when children in need of care come into contact with the criminal justice system, the lack of adequate accommodation options for older children, and the abuse of children even after they have been the subject of care orders.’<sup>18</sup> This has been additionally noted by the NSW state peak for young people, which noted how young people aged 14 – 17 often experience systemic neglect as a result of Child Protection policy and budget measures, and do not receive a government intervention or support even when at Risk of Significant Harm.

This is a consequence of the Keep Them Safe reforms when the threshold for what constituted Risk of Significant Harm was raised, with the intention that limited resources could be best spent on the most serious cases of child abuse and neglect. As a result, a long-standing issue for both youth specific SHSs and youth services more generally is the care, support and guardianship of young people who should otherwise be receiving care and protection support from the NSW government, but are not prioritized by the department. Such changes and gaps in policy should be considered in the policy context of any homelessness action plan, in order to ensure children and young people receive appropriate services and housing.

Lastly, a significant policy lever that has a direct impact on homelessness is young people leaving (ageing out of) the child protection system. It is well documented that young people leaving care experience heightened levels of vulnerability than the general population, and outcomes are poor. In the first year of leaving care, 35% of children and young people are homeless.<sup>19</sup> This is often attributed to poor policies and programs that support young people to transition out care.

**Recommendation 14:** Ensure the Homelessness Action Plan is informed by and has concrete activities to address the interface between child protection and homelessness. This should include the provision of appropriate services and advocacy.

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<sup>18</sup> Child Rights Taskforce (2011), *Listen to Children*. Child Rights NGO Report Australia, May 2011, p.13. Retrieved via <<http://www.ncylc.org.au/images/2011report.pdf>>

<sup>19</sup> Senate Community Affairs References Committee (2015). *Out of home care*, Senate Community Affairs Committee Secretariat, Canberra, p 104; See further, Flatau, P., et al (2015), *The Cost of Youth Homelessness in Australia Study Snapshot*. Report 1, p 2.