

17 March 2023

RE: Submission to Safe Places Emergency Accommodation Program Inclusion Round

To the Australian Department of Social Services,

Homelessness NSW (HNSW) is a not-for-profit Peak body working to end homelessness in NSW. We exist to build the capability of people and capacity of systems to end homelessness. We have a vision for a future where everyone has a safe place to call home and connection to their community. Our 190 members include specialist homelessness services, allied organisations and services. We work with our members, people with lived experience and a broad network of partners to understand drivers of homelessness, advocate for solutions, build skills and knowledge, and scale innovation.

Last year, more than 68,000 people were assisted with homelessness, but the true extent of the problem is much worse. More than 50% of people who sought support could not have their needs met because services do not have the staffing and asset capacity to meet demand. This capacity is significantly hindered by a lack of social and affordable rental housing, causing a backlog in the crisis system. Domestic and family violence (DFV) is a main reason women and children leave their home. In 2020–21, 116,200 people (42% of all SHS clients) who presented as clients to a Specialist Homelessness Service (SHS) reported that they were escaping DFV.¹ HNSW has a vision for a future where homelessness should never be more than rare, brief and non-recurring. We cannot achieve this without adequate and sustained investment in social and affordable housing.

HNSW welcomes the opportunity to contribute to the design of the Safe Places Emergency Accommodation Program Inclusion Round (SPEAPIR). HNSW supports the provision of additional emergency accommodation for women and children leaving DFV.

Our submission makes recommendations based on our experience of working with specialist homelessness services, people with lived experience of homelessness, First Nations communities and government partners. Our recommendations call upon the Australian Government to:

1. Increase funding to the Safe Places Inclusion Round and the Safe Places program generally.
2. Award grants according to need, using a collaborative commissioning approach.
3. Establish a formal agreement between the Commonwealth Department of Social Services (DSS) and the NSW Department of Communities and Justice (DCJ) to provide recurrent funding with Safe Places grants for all operational cost, including DFV and other specialist wrap-around services, ongoing maintenance and reporting on use for the 15-year designated use period.
4. Within the Safe Places Emergency Accommodation Inclusion Round, require applicants

¹ AHURI, 2022, Housing, homelessness and domestic and family violence - <https://www.ahuri.edu.au/research/brief/housing-homelessness-and-domestic-and-family-violence>

to have specialist knowledge, skills and competencies appropriate to the cohorts they seek to meet the needs of, but not necessarily all three cohorts.

5. Require that applications for projects supporting First Nations women and children are led by Aboriginal Community Controlled Organisations.
6. Require all Safe Places Inclusion Round projects to meet a minimum of the gold standard of the Liveable Housing Australia design guidelines in the National Construction Code.
7. Require all NSW applicants for Safe Places Inclusion Round grants to be compliant with the Domestic Violence NSW (DV NSW) Good Practice Guidelines.
8. Design and fund the SPEAPIR and all crisis accommodation programs with in-built funding for transitional, longer term and permanent housing.
9. Implement the “Development Periods” approach for all grant applicants in the Safe Places Inclusion Round.

If you wish to discuss this submission further, please contact Dean Hart, Industry Capacity Manager, Homelessness NSW Dean@homelessnessnsw.org.au

Thank you for considering our submission.

Yours sincerely,



Trina Jones,

Chief Executive Officer

Introduction

Domestic and family violence (DFV) affects people of all ages, genders and backgrounds, but it predominantly affects women and children. In Australia, 1 in 6 women (17% or 1.6 million) and 1 in 16 men (6% or 548,000) have experienced physical or sexual violence from a current or previous cohabiting partner since the age of 15. Domestic and family violence is among the leading causes of homelessness in NSW. Around 108,000 SHS clients (or 39% of all clients) in 2021-22 were clients who have experienced family and domestic violence.²

Recommendation 1: Increase funding to the Safe Places Inclusion Round and the Safe Places program generally.

The Australian Government has allocated \$100 million over 5 years to the SPEAPIR, which is an average of \$20 million per year nationally. The program estimates projects will be awarded between \$500,000 and \$8M each. If these funds were divided equally between the eight states and territories, on average each state / territory would be allocated \$2.5 million per year, which would likely fund only one (without land purchase) refuge per state. This amount of funding falls short of what it would cost to build the number of refuges, transitional accommodation or housing programs required for women and children leaving DFV.

There are currently 86 emergency accommodation refuges for victim-survivors of DFV within NSW. In 2021-22 in NSW, of the women who were victim-survivors of domestic DFV and homeless, 60% did not receive any accommodation from an SHS. When isolating this scenario to First Nations women, similarly, 56% did not receive any accommodation; and for women with disability, 50% did not receive any accommodation.³ On this basis, we estimate there is significant unmet need for crisis accommodation for First Nations and Culturally and Linguistically Diverse (CALD) women, and those with a disability. The quantum of need could be as high as an additional 24 refuges in NSW specifically for victim-survivors who identify in these groups, at an estimated cost of \$168 million.⁴

Using the above statistics to estimate the number of additional refuges required for relevant cohorts may also realise a comparatively conservative estimate as it is noted that only 9.4% of all SHS clients born in non-English speaking countries have their accommodation needs met; along with 33.6% of Indigenous clients; and 3.2% of people with disability.⁵ It is therefore expected if the rate of female victim-survivors of domestic and family violence who are homeless and whose “accommodation needs” had been met was publicly available, rather than just any accommodation being provided as examined above, it is likely the estimated refuges needed would be even greater.

² Specialist homelessness services annual report 2021–22, Australian Institute of Health and Welfare

³ Australia Institute of Health and Welfare 2022, [Specialist Homelessness Services Collection data cubes 2011–12 to 2021–22](#) – Date cube: SHSC demographics.

⁴ Productivity Commission 2023, [Report on Government Services – Homelessness Services](#), Tables 19A.14. Note: As accommodation provided for CALD or persons born in non-English speaking countries who are DFV victim-survivors and homeless is not available under AIHW data cubes, the rate of CALD clients unsupported with accommodation has been estimated with reference to the number of such clients provided with DVF services (993), and then applying the rate (60%) to estimate the number of CALD victim-survivor women who are homeless in need of accommodation. Calculation: 1403 (First Nations) + 151 (disability) + 596 (CALD) = 2150 / 4646 (total women victim-survivor women homeless) = 0.46. Estimated need = (0.6*86)*0.46 = 24. Estimated cost: 24*\$7m (average cost of each refuge).

⁵ Productivity Commission 2023, Report on Government Services – Homelessness Services, Tables 19A.4 – 19A.7.

Recommendation 2: Award grants according to need, using a collaborative commissioning approach.

DSS proposes to assess grant applications on a competitive basis, according to “value for money” for the Commonwealth. One of three criteria in this assessment of value is co-investment in the capital works by applicants – co-investment is described in the program design paper as “strongly encouraged,” in addition to a requirement to demonstrate financial capacity to maintain physical assets and to fund DFV specialist service provision from the new / refurbished building.

HNSW asserts that competitive tendering based on financial capacity to co-fund is not an appropriate model for funding specialised services for some of the most vulnerable cohorts of people in NSW. This grant assessment process will likely result in the awarding of grants in areas with stronger service systems already in place, featuring well-resourced providers. Small specialist services working with rural and remote populations or local communities will be less likely to be successful. Grants should be awarded based on levels of need and unmet need across the state, and where there are areas of high need with less mature service systems, these should be prioritised for investment. Co-contribution by services to the capital and recurrent costs of proposals should not be relied upon by Government to compensate for the relatively small funding allocation of \$100 million for this ambitious program.

DSS should implement a collaborative (rather than competitive) commissioning model, centred around areas of high need for First Nations, CALD and/or women and children with disability. A collaborative commissioning model would incentivise co-contribution by local providers to a joint proposal – for both capital builds and ongoing service provision. This joint proposal would identify the outcomes sought for the local population and then jointly identify how these can be achieved in the local service system. There are examples of comparable commissioning models being implemented currently by NSW Health and in other sectors.

Beyond individual programs or grant awards, commissioning approaches are important because they have the potential to influence the cohesion of whole service landscapes, which directly impacts communities accessing services. HNSW believes Government has a responsibility to create commissioning structures that incentivise the building of trust and collaboration and move away from competitive tendering approaches that fracture local relationships and sector cohesion. This is an important role that Government can play in creating a truly outcomes-focused system.

Recommendation 3: Establish a formal agreement between the Commonwealth Department of Social Services (DSS) and the NSW Department of Communities and Justice (DCJ) to provide recurrent funding with Safe Places grants for all operational cost, including DFV and other specialist wrap-around services, ongoing maintenance and reporting on use for the 15-year designated use period.

The Safe Places grants program provides funding for capital works (purchase, building or renovation of dwellings), but not service provision (DFV service provision, other specialist service provision or maintenance), which are the responsibility of the applicant. Costs for these functions almost always flow to State Government agencies; in NSW this is typically DCJ. Many DFV specialist services in NSW and particularly Aboriginal Community Controlled Organisations (ACCO) and CALD organisations are often small and medium sized organisations and provide high quality services to their communities. It is highly unlikely that individual service providers and particularly these small / medium specialist service would be able to cover ongoing

operational costs associated with a new crisis accommodation service from within existing contractual agreements with their state funding agency.

DCJ are currently part-way through implementation of the Core and Cluster program to provide funding for the refuge asset, maintenance and specialist service delivery.

To achieve the best results from the Safe Places grants program and the Inclusion Round specifically, DSS should establish a formal agreement with DCJ to fund service provision, or commit to providing Commonwealth funds directly. Further it is suggested that these formal agreements be finalised prior to the commencement of the SPEAPIR. Given that DCJ are currently delivering the Core and Cluster program, now is an ideal time for DSS and DCJ coordinate the funding and delivery of emergency accommodation for women and children leaving domestic and family violence in NSW.

Recommendation 4: Within the Safe Places Emergency Accommodation Inclusion Round, require applicants to have specialist knowledge, skills and competencies appropriate to the cohorts they seek to meet the needs of, but not necessarily all three cohorts.

The Safe Places Emergency Accommodation Program (Inclusion Round) Program Design Discussion Paper identifies that existing emergency accommodation is not always appropriate or accessible for cohorts, including First Nations women, women and children with disabilities and women and children from CALD backgrounds.⁶

The discussion paper states that “the objective of the inclusion round is to increase the number of new and appropriate emergency accommodation places for women and children leaving DFV and to increase accessibility for First Nations women and children, women and children from CALD backgrounds, and women and children with disability, including those who experience the intersection of racism, ableism, and sexism.

To achieve the above objective, HNSW suggests that there needs to be a clear requirement for applicants to have specialist knowledge, skills, and competencies relevant to the cohort(s) they seek to support. However, applicants should not necessarily be required to have specialist knowledge and provide service to all three cohorts. For example, while an ACCO may be well placed to provide services to a local First Nations community they may not be well placed to also provide services to women and children from CALD backgrounds. The assessment process should also prioritise applications where partnerships between specialist services are leveraged to provide appropriate support for more than one group.

Recommendation 5: Require that applications for projects supporting First Nations women and children are led by Aboriginal Community Controlled Organisations.

HNSW recognises that First Nations community-controlled services achieve better results, employ more First Nations people, and are often preferred by communities over mainstream services. As such, HNSW supports the provision of services for Aboriginal communities by ACCO's. This approach is supported by Closing the Gap - Priority Reform Two: *Building the*

⁶ DSS 2023, [The Safe Places Emergency Accommodation Program \(Inclusion Round\) Program Design Discussion Paper](#).

Recommendation 6: Require all Safe Places Inclusion Round projects to meet a minimum of the gold standard of the Liveable Housing Australia design guidelines in the National Construction Code.

The Liveable Housing Design Guidelines (the guidelines) establish accessibility performance standards for homes at three levels (Silver, Gold and Platinum). The Silver level includes basic elements that are critical to future flexibility and adaptability of the home. The Gold level provides for a higher level of accessibility including more generous dimensions. The platinum level includes all elements of the guidelines and is the highest level of accessibility.

A focus of the SPEAPIR is improving access to appropriate emergency accommodation for women and children with disabilities. As such, all accommodation funded from the program should meet the Gold standard as a minimum, which would ensure that new / refurbished buildings achieve a high level of accessibility.

Recommendation 7: Require all NSW applicants for Safe Places Inclusion Round grants to be compliant with the Domestic Violence NSW (DVNSW) Good Practice Guidelines.

DVNSW has developed DFV Good Practice Guidelines, which:

- Provide a framework to support the delivery of high quality, consistent responses to victim-survivors across the DFV sector in NSW;
- Provide services with a tool to assist them to provide high quality services and guidelines for service development, planning and quality assurance; and
- Recognise the specific needs of victim-survivors from a diverse range of backgrounds and the importance of flexible service responses that respond to individuals' specific needs.

HNSW supports implementation of the DVNSW Good Practice Guidelines for all DV services.

Recommendation 8: Design and fund the SPEAPIR and all crisis accommodation programs with in-built funding for transitional, longer term and permanent housing.

HNSW champions a common goal to end homelessness in NSW. This means it is rare brief and non-recurring. The current homelessness system cannot achieve this due to insufficient resourcing and fractured responses. This is largely a result of blockages to pathways to long term housing.

In addition to crisis accommodation for women and children leaving DFV, transitional and longer term accommodation is urgently needed. This need is particularly significant for First Nations women and children, CALD women and children and women and children with disabilities as outlined under recommendation 1. Despite specialist homelessness services operating on average beyond their funded client numbers by 30%, in 21/2022, 50% of people who sought support could not have their accommodation needs met. This includes support provision, crisis

⁷ <https://www.closingthegap.gov.au/national-agreement/priority-reforms>

accommodation, transitional accommodation and long-term accommodation.

The unprecedented pressure on the rental market has created significant challenges for specialist homelessness services and women and children in finding longer term rental properties when they are ready to move on from emergency accommodation. Access to housing that people can afford to live in has significantly reduced across the state with regional areas reporting extreme shortages and research showing less than 1% of rentals available for people on low income.⁸ Private renters experience tenure that is perpetually precarious and uncertain.

HNSW recommends that any crisis accommodation program be designed and funded to provide supported pathways from crisis accommodation, through to permanent housing options. This long-view, coordinated approach to housing and homelessness policy at Government level is a vital missing link - the service system cannot solve homelessness without it.

In the context of longer-term pathways for women and children included in the SPEAPIR cohort, HNSW recommends:

- Assessment of transitional housing options in any area where crisis accommodation is funded, and provision of additional capacity where needed – funded within the program or by related funding streams.
- Assessment of social housing stock locally and wide-scale, major investment in social housing across the state. NSW currently has approximately 154,000 social housing properties, representing 4.7% of all occupied residential dwellings. Social housing stock has significantly atrophied over the last decade, and a social housing target of 10% of occupied residential dwellings by 2050 is needed to enable long term pathways out of homelessness and eliminate the current backlog on the social housing waiting list.

Recommendation 9: Implement the “development periods” approach for all grant applicants in the Safe Places Inclusion Round.

The Safe Places Inclusion Round Discussion Paper explains that applicants may be awarded up to six-month additional time to finalise their proposal as a “development period”. This offer is to be subject to “funding availability, i.e. should there be funding remaining after fully developed grant proposals are assessed”. HNSW contends that this extended “development period” of up to six months should be offered to all applicants and funding allocated at the end of the period to enable more thoughtful development of proposals, including involvement of local stakeholders and people with lived experience. This approach would ensure the inclusion round is truly inclusive, enabling specialist organisations to work with their communities to develop effective projects that meaningfully address each cohort’s needs. This approach would complement the community commissioning approach outlined in Recommendation 2 above, giving more time for the development of partnerships.

⁸ Anglicare 2019, Sydney Rental Affordability Snapshot, ONLINE <https://www.anglicare.org.au/about-us/media-releases/still-less-than1-affordable-for-people-on-low-incomesdespite-increase-in-rental-properties/>