

## **Pathways to Ending Homelessness: Interim Findings and Recommendations to Enhance Temporary Accommodation Provision in NSW**

*July 2023*

Homelessness NSW is a not-for-profit peak agency to end homelessness in NSW. We exist to build the capability of people and the capacity of systems to end homelessness. We have a vision for a future where everyone has a safe home and the support to keep it. Our 200 members include specialist homelessness services, people with lived experience, allied organisations and services working to end homelessness. 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.

Where a person can demonstrate they are experiencing homelessness or do not have safe accommodation for the night, the NSW Department of Communities and Justice (DCJ) may pay for a limited number of nights of Temporary Accommodation (TA). This support is predominantly accessed via Link2Home and DCJ Housing Offices. In some areas, Community Housing Providers fulfill the role and in some cases specialist homelessness services provide TA. TA is also provided for those impacted by natural disasters through the DCJ's Welfare services Functional Area Coordinator although this is not in the scope of recommendations of this interim findings summary.

In May 2023, Homelessness NSW conducted a survey to obtain feedback on opportunities to improve TA for people experiencing homelessness in NSW. The survey was designed with input from homelessness and advocacy peaks and refined by Chris Hartley, Research Fellow at Centre for Social Impact. There were 237 survey responses, from statewide specialist homelessness and allied services and TA providers. Respondents report that TA is failing to effectively and consistently offer the access, support, safety, and stability that is needed to provide pathways out of homelessness. This paper outlines 12 interim recommendations and findings from this study, for further input and feedback to inform a final report to be released later in 2023. The recommendations are grouped under three priority areas: improve access to Temporary Accommodation; increase wraparound support and safety within Temporary Accommodation; and provide pathways out of homelessness from Temporary Accommodation.

We welcome your further input and feedback to these interim findings and recommendations. Please address your response via email to Dr Kate Davies, Manager Policy and Research [Kate@homelessnessnsw.org.au](mailto:Kate@homelessnessnsw.org.au) on or before 16 August 2023.

## **Recommendation Overview**

### ***Improve access to Temporary Accommodation***

1. Increase the initial minimum TA days provided from two to seven (nine if request falls on a weekend).
2. Remove the 28 days per annum cap on the number of TA days and instead provide the number of days required, as determined by approved service providers.
3. For people impacted by domestic and family violence, remove the eligibility requirement to have less than \$1,000 in their bank account. Increase this limit for all other applicants.
4. Where evidence and identification cannot be immediately produced, allow for TA to be provided based on the initial assessment of approved service providers.

### ***Increase wraparound support and safety within Temporary Accommodation***

5. Consult with service providers and people with lived experience to identify changes needed to simplify and speed up the TA application process. Revise eligibility guidelines accordingly and ensure they are available to, and understood by, service providers and TA applicants.
6. Undertake analysis of availability of TA based on local need and undertake regular audits and review of providers for safety, accessibility, and quality.
7. Embed cultural safety in all parts of the TA system. This should include employment and workforce development for more Aboriginal and Torres Strait Islander staff, training for all staff in Link2Home, DCJ and service provider agencies, and more culturally appropriate complaint mechanisms.
8. Increase access to trauma-informed and person-centred support for people in TA.

### ***Provide pathways out of homelessness from Temporary Accommodation***

9. Enable approved specialist homelessness services to assess people's needs and request additional TA days via phone or via email, without a person having to physically attend a Housing Office.
10. Permanently remove the requirement for TA participants to provide a rental seeker diary.
11. Employ local TA triage and outreach support teams to improve coordination across agencies to reduce risk of homelessness and support transitions between prisons and hospitals and TA.
12. Increase the availability of social and supported housing and wraparound support to provide pathways out of homelessness.

## Findings and Recommendations

### *Improve access to Temporary Accommodation*

**Recommendation 1:** Increase the initial minimum TA days provided from two to seven (nine if request falls on a weekend).

Findings from the survey highlight the need to increase the number of days of TA provided from the first assessment, currently set at two days (four days if the request call is made on a weekend). This is based on reports of two days being too short a timeframe to connect with a person and support them with a pathway out of homelessness. After initial assessment of need, TA should be provided for at least seven days (nine days if the request call is made on a weekend), before any type of re-application is required. It is important that the people accessing TA have a clear plan for the end date of the TA and what supports are in place.

**Recommendation 2:** Remove the 28 days per annum cap on the number of TA days and instead provide the number of days required, as determined by approved service providers.

In 2021, one in two people who sought support from specialist homelessness services could not have their accommodation needs met.<sup>1</sup> Service providers and the people they support in TA must have time to work through the complex and critical issues impacting a person's experiences of homelessness. Limits on the days of TA accessed after initial assessment and over the period of a year prevent people experiencing homelessness from accessing pathways out of homelessness. This is particularly pertinent given the current shortages of social and affordable rental housing.

The TA rules were modified during the 2020 and 2021 COVID-19 lockdowns for people who self-identified as sleeping rough. This enabled people to: access an initial block of 30 days of TA; exclude days of TA taken prior to April 1, 2020 when calculating entitlements; and extend TA entitlements beyond 30 days if the applicant was engaging in DCJ services. Outcomes improved for people experiencing homelessness during this period and while these changes have been gradually wound back, they demonstrate the positive impacts of extending TA access.

**Recommendation 3:** For people impacted by domestic and family violence, remove the eligibility requirement to have less than \$1,000 in their bank account. Increase this limit for *all* other applicants.

Some current eligibility requirements impede people in the most urgent need from accessing TA and exacerbate poverty. This includes the financial eligibility criterion that restricts access

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<sup>1</sup> Australian Institute of Health and Welfare. (2022). Specialist Homelessness Services annual report 2021–22. Australian Government.

to TA if a person's bank balance exceeds \$1,000. This is particularly problematic for people impacted by domestic and family violence who may share bank accounts with perpetrators or be victims of financial abuse. Further, the current limits do not adequately account for the cost of living and cost of short-term accommodation. It is widely understood that TA must be means tested but the circumstances and context must also be taken into account. People should not be disadvantaged where there are risks associated with accessing funds and should not become further impoverished by having to spend limited available funds before support is provided.

**Recommendation 4:** Where evidence and identification cannot be immediately produced, allow for TA to be provided based on the initial assessment of approved service providers.

The current evidence requirements for TA direct applicants to the same evidence requirements for a social housing application. This is a lengthy and time-consuming process where clients must provide documentation to support their application for emergency temporary accommodation. This includes an 11-page form with 30 points of identification required.<sup>2</sup> Some of the documentation required can create a barrier for people to access support. This is sometimes waived at the TA provider officer level in place of fewer ID requirements but not consistently and can be a major barrier for people accessing timely trauma-informed support.

Service providers report the application process for TA is lengthy and complicated and lacks consistency and clarity. This compounds stress and trauma at a time of crisis for vulnerable people. The extent and types of identification required to access TA are burdensome and, in some cases, create impossible barriers for people in crisis. It can take days for support workers to help people access relevant identification documents. People most likely to need TA are those least likely to have access to identification and evidence such as bank statements, birth certificates and written confirmation of Aboriginal or Torres Strait Islander descent. TA must be available while such identification and evidence is being sourced.

**Recommendation 5:** Consult with service providers and people with lived experience to identify changes needed to simplify and speed up the TA application process. Revise eligibility guidelines accordingly and ensure they are available to, and understood by, service providers and TA applicants.

The TA eligibility criteria are not clear or user friendly,<sup>3</sup> leading to a complex and inconsistent application process. Survey respondents made numerous comments about the application process in general:

- Service providers report that access to TA and provision of days, location and support is

<sup>2</sup> Evidence requirements information sheet DH3001a. Available at <https://www.facs.nsw.gov.au/download?file=329224>

<sup>3</sup> Eligibility for emergency temporary accommodation other than because of a natural disaster. Online. Available at <https://www.facs.nsw.gov.au/housing/policies/social-housing-eligibility-allocations-policy-supplement/chapters/emergency-temporary-accommodation>

- dependent on the provider “on the day”.
- Service providers and people experiencing homelessness report the application processes are difficult and particularly challenging for people with low literacy, English as a second language, intellectual disabilities and those experiencing mental distress.
  - The process has also been described as distressing due to the burden of proof of crisis required and also requirements for extensive documentation (see recommendation 4). Service providers and people accessing TA also report in many cases clients are treated with impatience and a lack of compassion.
  - Service providers are using substantial amounts of time to support people through this complicated and uncertain bureaucratic process.

Comments were also made about unclear eligibility for specific cohorts:

- There is a lack of clarity regarding access to TA for some groups of people, such as unaccompanied young people, non-residents and existing social housing tenants. Service providers are often uncertain as to the formal eligibility requirements and this means that there are inconsistent outcomes for some groups of people.
- Survey respondents raised concerns about how best to ensure that appropriate accommodation is provided to unaccompanied young people (those aged 10-17 who are on their own when they seek assistance), a group particularly impacted by challenges in providing identification and evidence.
- Respondents also called out the difficulty in supporting non-residents including people on temporary visas and New Zealand citizens who are being denied, or offered very limited, access to TA, largely because of the lack of clarity regarding eligibility requirements. This comes with significant risk given the limited access to income for people on temporary visas and may mean, for example, that people experiencing domestic and family violence are less likely to leave an unsafe home.

Further consultation with service providers and people with lived experience of applying for TA, is needed to inform specific reforms to eligibility requirements and application processes. It is recommended that a simplified and transparent process where eligibility criteria are interpreted consistently by service providers, would increase service providers’ capacity to focus on individualised casework support and enable service providers. It would allow TA providers to work together to facilitate steps towards longer-term housing solutions for those experiencing homelessness.

### ***Increase wraparound support and safety within Temporary Accommodation***

**Recommendation 6:** Undertake analysis of availability of Temporary Accommodation based on local need and undertake regular audits and reviews of accommodation options for safety, accessibility, and quality.

*Note: These are interim, preliminary findings for consultation and feedback from Homelessness NSW members and partners.*

There are insufficient TA options to meet demand and those options that are available are often poor quality, unhygienic and unsafe. There is a lack of accessible TA options for people with disabilities, particularly in regional and rural areas. TA options are often unsafe for women escaping domestic violence, again particularly in rural and remote areas where there are limited options. Survey respondents reported incidents where people fleeing domestic and family violence had been placed in accommodation near perpetrators. There are limited options for accommodation suitable for families and unaccompanied minors. There are very few TA options that will accommodate people with pets and given that pets can be vital support for people experiencing trauma, this excludes some people from TA. People often need to travel long distances to access TA, with limited or no transport.

It is recommended that local needs analyses be undertaken at sites across the state, and solutions sought through partnership with specialist homelessness services in areas that can't provide appropriate temporary accommodation options. It is also recommended that regular audits of providers and the available accommodation options be undertaken to assess safety and suitability.

**Recommendation 7:** Embed cultural safety in all parts of the Temporary Accommodation system. This should include employment and workforce development for more Aboriginal and Torres Strait Islander staff, training for all staff in Link2Home, DCJ and service provider agencies and more culturally appropriate complaint mechanisms.

Aboriginal and Torres Strait Islander people experience homelessness at 10 times the rate of non-Indigenous Australians. Further, the experience of homelessness has been found to be culturally distinct for Aboriginal and Torres Strait Islander people.<sup>4</sup> Interim findings from this study indicate that Aboriginal and Torres Strait Islander people are facing discrimination and exclusion from the TA system. This occurs through individual interactions with staff in various parts of the system and through the many structural barriers that mean TA processes and services are not culturally safe. There is a lack of choice and control for people accessing TA. This is particularly acute for Aboriginal and Torres Strait Islander people.

It is recommended that cultural safety be embedded in all parts of the TA system. All TA applicants should feel respected and free from discrimination from their very first interactions with Link2Home and service provider staff, through to exits out of TA. Accommodation and support options should be appropriate to specific cultural experiences of home and homelessness. This should also include employment and workforce development for more Aboriginal and Torres Strait Islander staff, training for all staff in Link2Home, DCJ and service provider agencies and more culturally appropriate complaint mechanisms that ensure

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<sup>4</sup> Tually, S., Tedmanson, D., Habibis, D., McKinley, K., Akbar, S., Chong, A., Deuter, K. and Goodwin-Smith, I. (2022) Urban Indigenous homelessness: Much more than housing, AHURI Final Report No. 383, Australian Housing and Urban Research Institute Limited, Melbourne, doi: 10.18408/ahuri3222701.

experiences of discrimination and exclusion are reported and actioned.

**Recommendation 8:** Increase access to trauma-informed and person-centered support for people in Temporary Accommodation.

There is a lack of trauma-informed care throughout the system, from assessment through to exits out of TA (as per recommendations 1 to 7 that highlight the stress, discrimination and barriers associated with application and accommodation). Service providers report that, despite growing trauma-informed care skills in frontline homelessness service workers, the whole experience of accessing TA is traumatic and stressful. In contrast to other government services like those at Service NSW where people are welcomed as “customers” of a service, people accessing TA are often treated with impatience and a lack of compassion. The focus is on the *process* not the *person*. Many people will be placed in TA without a change of clothing, access to food or a link to a case worker. For families, many can be placed in unsuitable accommodation without basic facilities to make bottles or access nappies or baby food items. People often have very little information about what to expect from their accommodation and it can be a very fearful experience.

The current system requires service providers to take substantial time to support people through TA application, evidence and re-application processes. Instead, frontline workers need to be able to implement their specialist skills and focus their time and efforts on providing trauma-informed case planning that supports people with safe pathways to home. The process from application, entry and exit of TA needs to be redesigned with a trauma informed and person-centered approach.

***Provide pathways out of homelessness from Temporary Accommodation***

**Recommendation 9:** Enable approved specialist homelessness services to assess people’s needs and request additional TA days via phone or via email, without a person having to physically attend the Housing Office.

The limited provision of TA requires service providers to work intensively over a short timeframe to identify appropriate pathways of further support or triage within an environment of high stress and limited resources. The requirement to bring a person to the TA office every 3 days for reassessment is labor intensive, distressing, and inefficient.

Staff in specialist homelessness services are skilled, qualified practitioners best placed to assess people’s individual needs and circumstances. As funded and accredited providers DCJ should trust their assessment of need for the people they are supporting and permit extensions of TA to be requested over the phone or online.

TA extension requests should be more heavily weighted towards the recommendations and assessments of approved service providers.



**Recommendation 10:** Permanently remove the requirement for TA participants to provide a rental seeker diary.

The 12-month freeze on rental seeker diaries, which required people to demonstrate that they are actively looking for housing, was a positive step forward. These diaries should be permanently removed as a requirement for TA access. This would allow people and workers to concentrate efforts on critical actions to access long-term housing, without additional administrative burdens. The requirements associated with rental seeker diaries are unfeasible, particularly in circumstances where affordable rental accommodation for those on the lowest income is between 0 and 1%.<sup>5</sup>

**Recommendation 11:** Employ local TA triage and outreach support teams to improve coordination across agencies to reduce risk of homelessness and support transitions between prisons and hospitals and TA.

People exiting institutions such as hospitals and prisons are insufficiently supported through TA to re-establish stable lives. People are exiting prison without identification and with very limited understandings of the processes for application and extensions to TA. People who spend time in prison are among those most likely to have previously experienced homelessness or to experience homelessness in the future. People exiting hospitals without secure long-term accommodation are at high risk of experiencing homelessness. Barriers to access and limited support during TA are not sufficiently protecting people from becoming homeless after exiting hospital. The current TA processes do not adequately break the cycles between time in institutional settings and homelessness.

It is recommended that local outreach support teams are employed to provide intake and triage support to people in TA to reduce the burden on the crisis service system. Such improved coordination and cross-agency collaboration can build on lessons from the implementation of the Housing and Mental Health Agreement between NSW Health and DCJ.<sup>6</sup>

**Recommendation 12:** Increase the availability of social and supported housing and wraparound support.

TA is intended as a short-term measure to keep people safe while long-term housing and support is put in place. The current TA system is failing to achieve this purpose. Evidence-based Housing First models, such as the Together Home program, and Youth Foyers must be expanded so that there is a clear pathway from TA into secure housing and intensive, individualised support for people to have a safe home and the support to keep it.

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<sup>5</sup> Anglicare. (2023). 2023 Rental affordability snapshot. Anglicare Australia. Available at <https://www.anglicare.asn.au/publications/2023-rental-affordability-snapshot/>

<sup>6</sup> NSW Government. (2022). The Housing and Mental Health Agreement 2022. Available at <https://www.health.nsw.gov.au/mentalhealth/resources/Pages/housing-and-mental-health-agreement-2022-overview.aspx>