



Homelessness Australia
Creating a framework for ending homelessness

Submission in response to
the Australian Bureau of
Statistics discussion paper
on the methodological
review of *Counting the
Homeless 2006*

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Dear Trevor

Homelessness Australia is pleased to be able to provide the ABS with a submission that we hope will inform the methodological review of *Counting the Homeless 2006*.

The content of this submission includes examples of undercounting that have been identified by practitioners and peak body representatives of our Board, Councils and member services. A number of these were identified and included in our submission in response to the *issues paper* that was released in October 2009.

It also summarises a number of the main points and changes to the number of people counted as homeless in different segments of the population contained in the Discussion Paper and provides a brief response to each based on feedback from our Board, Councils and membership.

This submission also canvasses a number of issues that Homelessness Australia has committed to working through with the ABS over the course of the remainder of 2011 including our involvement in the sector reference group that the ABS has committed to establishing as an outcome of the methodological review.

Homelessness Australia is committed to working constructively with the ABS and the homelessness sector to address issues of concern regarding the methodology used to evaluate homelessness in Australia.

Homelessness Australia acknowledges the considerable progress that has been made since we commenced a process of constructive engagement with the ABS in February 2011.

Homelessness Australia shares the desire expressed by the ABS to achieve the most accurate homelessness analysis possible. We trust that the content of this submission will assist the ABS to consider a range of practical issues that may affect the estimation of the number of people experiencing homelessness in Australia at a point in time using an instrument such as the Census and that it will contribute constructively to the eventual outcomes of methodological review of *Counting the Homeless 2006*.

Yours Sincerely

Nicole Lawder, Chief Executive Officer

Our Organisation

Homelessness Australia is the national peak body representing over 1500 providers of services to people experiencing homelessness as well as those who are at risk of becoming homeless because of their present life circumstances.

Our organisation receives advice and information about issues of concern to providers of services to various client groups (including women and children escaping domestic violence, young people, Indigenous Australians, people in regional, rural and remote locations and people from non-English speaking backgrounds through our councils and reference groups. Homelessness Australia is governed by a thirteen person board made up of members nominated by our councils and reference groups and including our Executive Officer and an independent chairperson.

We are also a member driven organisation and at present we are proud to acknowledge the work of over 350 associate members of Homelessness Australia. Our associate members include providers of direct services to people experiencing homelessness, other homelessness and housing peak bodies, some Government Departments, NGOs and individuals. We liaise closely with other national peaks in the social and community services sector including the Australian Council of Social Service (ACOSS), the Community Housing Federation of Australia (CHFA), Jobs Australia and National Shelter.

Homelessness Australia seeks to promote awareness of the causes and effects of homelessness in Australia and to be proactive in putting forward and advocating for the creation of a framework to end homelessness. We do this by advocating on behalf of people who are experiencing homelessness and working collaboratively with organisations and providers of frontline services to people experiencing homelessness and those who are at risk of becoming homeless. We aim to continuously contribute to the development of national policies and service delivery models that will progressively reduce homelessness and we support the involvement of the whole community in taking responsibility for addressing the causes and consequences of homelessness.

As a member driven organisation we have sought extensive input from our associate members in the process of drafting our submission to the methodological review. We have previously advocated for the need for an accurate and robust methodology to determine the scale of homelessness and trends over time and we welcome the opportunity to contribute to this review as the next step in that process.

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Introduction

2011 is an important year for stakeholders with an interest in ending homelessness in Australia. It will be the first Census year since the release of the Australian Government's White Paper on homelessness, *The Road Home* which set an ambitious interim target of reducing overall homelessness by 20% by 2013 and halving it by 2020ⁱ.

The 2011 Census will provide us with the first national, state/territory and region by region indicator of whether or not the new investments in homelessness programs and housing for people experiencing homelessness, as outlined in the White Paper, have resulted in an overall reduction between 2006 and 2011. In September 2009, the Australian Bureau of Statistics (ABS) announced that it was conducting a review of the methodology used to enumerate homelessness in Australia. Homelessness Australia participated in the ABS workshop.

In October of 2009, the ABS produced a paper entitled *Issues in estimating the number of homeless in Australia* which was intended to inform a review of the *Counting the Homeless* methodologyⁱⁱ. The paper briefly set out the methodology that has been used by Chris Chamberlain and David MacKenzie to construct their homelessness counts after the 1996, 2001 and 2006 Censuses. It described the definitions and assumptions employed, the calculations made and "as far as possible", the processes and procedures that impact on the figures used. Against each of the elements the ABS raised issues for consideration in the reviewⁱⁱⁱ.

Submissions were sought in response to the issues paper and a total of fourteen organisations responded to the issues raised in the ABS paper including Homelessness Australia^{iv}.

The issues paper reiterated the importance of the Census night homelessness counts as representing our best published national counts of homelessness but asserted that:

"...There is widespread agreement that the numbers reported in Counting the Homeless are indicative rather than necessarily being entirely appropriate for performance indicator construction and may well overestimate the count of homeless people in Australia in general and that of homeless youth in particular..."^v

This assertion was not supported by Homelessness Australia's Board, Councils or Members who provided numerous examples of people who would meet the ABS cultural definition of homeless on Census night but who for a number of reasons would not be identified as such. These examples were included in our detailed response to the issues paper that was submitted to the ABS in November 2009.

During our consultations with members following the release of the Discussion Paper in March 2011 we confirmed that the examples of potential undercounting remained valid. These are included in the body of our submission below.

Homelessness Australia also acknowledges that there are examples of people who may be incorrectly counted as homeless in the Census data because of their

dwelling type but whose overall circumstances may not meet the criteria for the ABS cultural definition of homelessness. These are also addressed in the submission below.

As we have stated consistently throughout the review process it is in everyone's best interests that we achieve the most accurate homelessness count that is possible at the 2011 Census. We are pleased with the process of constructive engagement with the ABS that has occurred over the past three months.

Homelessness Australia believes that the ABS has taken on board much of the advice it has received from practitioners within the homelessness sector about the challenge of enumerating people who are experiencing homelessness through a vehicle such as the Census, given that it is by definition a survey of households, something many people experiencing homelessness, also by definition, are not in fact a part of on Census night.

Homelessness Australia hopes that this submission will inform the next stage of the review process and will serve to consolidate the feedback that we have received from our members over the past eighteen months in response to the methodological review of *Counting the Homeless 2006* that has been conducted by the ABS.

We look forward to continuing to work with our members and the ABS as the review process continues with the aim of achieving a methodology for estimating the prevalence of homelessness in Australia that broadly has the confidence of both the sector and the ABS.

Background

The release of the White Paper in December 2008 with clearly defined goals and targets for reducing homelessness, notably the headline goal of halving homelessness and the interim targets of reducing overall homelessness by 20% and primary homelessness by 25% by 2013 appears to have been the catalyst for the decision by the ABS to review the methodology used to enumerate homelessness via the *Counting the Homeless* reports.

Homelessness Australia understands that it was these targets and the performance indicators that are incorporated in the National Affordable Housing Agreement and National Partnership Agreement on Homelessness that led the COAG to ask the ABS to examine the appropriateness of using the figures arrived at using the *Counting the Homeless* methodology for performance indicator construction.

As was stated in the 2009 Issues Paper, the ABS is not convinced the figures contained in the *Counting the Homeless* reports are necessarily entirely appropriate for performance indicator construction. We interpret this to mean that the ABS does not believe that the Government should use the overall homelessness figure or the primary homelessness count arrived at in 2006 as the baseline against which to measure progress towards meeting the 2013 interim targets or the headline goal of halving overall homelessness by 2020.

This raises the immediate question: If the detailed national, state/territory and regional counts established through the *Counting the Homeless* reports are not appropriate sources of baseline data, what alternative sources of data are there against which progress towards meeting the interim targets and headline goals in the White Paper can be measured?

To date, the *Counting the Homeless* reports have provided the only comprehensive national counts of homelessness we have available to us in Australia. We are not yet aware of any alternative data sources that would be more appropriate for performance indicator construction. That said, it is clear that the ABS believes that the revised estimates in the Discussion Paper will provide an appropriate baseline against which to measure progress.

The figures quoted in the *Counting the Homeless* reports have now been in the public domain for some time and were the basis for the commitments made in the White Paper including the funding provided under the NPAH. Homelessness Australia is concerned that changes to the methodology and strategies employed to adjust for over counting and under counting may create confusion within the homelessness sector, the media and the Australian community.

Homelessness Australia has consulted widely over the past eighteen months on the broader issues pertaining to the enumeration of people who are experiencing homelessness. We did this during the period in which the ABS was conducting its internal methodological review of *Counting the Homeless*.

The 2011 Census is critically important to stakeholders with an interest in addressing homelessness. It is vital that the 2011 Census count is as accurate as possible. We need an accurate count to ensure that we can measure the progress we are making towards the achievement of the 2013 interim goals as we look forward to 2020.

Examples of undercounting

In this submission we cite a number of examples in which people who would in fact meet the ABS cultural definition of homeless on Census night but who are not actually counted as homeless. These have been highlighted by our members and are based on their experience as practitioners working with people who are experiencing homelessness. We submit that people in these circumstances are unlikely to be either correctly identified or identified at all on a Census form. The examples are listed below:

Example #1: Women escaping domestic violence who are unable to be accommodated in a refuge or motel and who are turned away and either sleep in a vehicle in a concealed location or are accommodated by a friend or relative for the night

Due to the nature of domestic and family violence, women who escape violence but are unable to be accommodated by a domestic violence service on Census night are for reasons of safety likely to be accommodated in circumstances that are not amenable to them being identified on a Census form.

Data on the number of people turned away from Government funded homelessness services (measured over a five day period on a twice yearly basis) showed that 67% of single adults presenting to specialist homelessness services with children seeking accommodation were turned away^{vi}. It is likely that a high proportion of this group are women fleeing violence and presenting to a refuge seeking immediate accommodation.

This includes women who are forced to sleep in a vehicle and may do so in a concealed location and people who are accommodated anonymously by a friend or relative for short periods that include Census night itself.

Many women (and children) will want to remain hidden because of the fact that perpetrators of that violence often go to great lengths to find their ex-partners when they do summon the courage to leave the situation in which violence is occurring, they are likely to specifically ask that they are not recorded on a Census form even though the Census collection is not likely to lead to their location being uncovered.

For women forced to shelter in a vehicle on Census night, it is likely to that they will do so in a concealed location that will not be identifiable to a Census collector even if they are assisted by workers from homelessness services. This is particularly true if the woman leaves on the day of the Census.

There may also be other living situations, many of them tenuous and unsafe, that women end up living in, in order to put a roof over their head away from violence. Examples provided by our members included; women taking housekeeping/live-in domestic jobs in return for accommodation and younger women 'couch surfing' after escaping violence.

Essentially, Homelessness Australia believes that many women who are experiencing homelessness on Census night would not identify themselves on a Census form and would thus not be counted as homeless on Census night. It is a form of homelessness affecting large numbers of women and children who are not likely to be easily identifiable on a Census form.

#2: Young people 'couch surfing' with friends and relatives who do not consider themselves homeless or who are not considered to be homeless by the 'householder' filling in the form

Despite what the ABS Issues Paper and Discussion Paper implies, it is widely known and well documented that significant numbers of young people, if not the majority of young people experience homelessness in the form of 'couch surfing', staying temporarily with friends and relatives but with no formal occupancy or tenancy rights to the property^{vii}.

Many of these young people would not identify themselves as homeless and/or would identify the place in which they are staying as the place that they "usually live". This would likely be because the householder (be they friend or relative) would genuinely consider the young person to be a usual resident of the household if they had nowhere else to go.

Similarly, young people who do not consider themselves to be homeless are likely to indicate (if they fill out the Census form at all), that they 'usually live' at that address, especially if it is unsafe or unviable for them to return to the home of a parent or guardian or for various reasons they are unable or unwilling to do so.

Homelessness Australia believes it would be very difficult to determine simply by cross-tabulating Census data which young people are "sleeping over" at friends or relatives places with permission and which young people are 'couch surfing' because they have nowhere else to go. We believe that a significant number of young people are not likely to be counted as homeless by Census collectors but who are, on Census night, living in circumstances that would enable them to meet the cultural definition of homelessness. After consulting extensively with practitioners and peak bodies in the youth sector, we have formed the view that the youth homelessness count drawn directly from Census night data would significantly understate the prevalence of youth homelessness in Australia.

Example #3: Indigenous people living in overcrowded households

Homelessness Australia believes that the number of Indigenous Australians counted as "secondary homeless- staying with friends and relatives" on Census night significantly understates the problem of Indigenous homelessness that is masked by overcrowding. Chamberlain and Mackenzie have acknowledged that the numbers arrived at in the *Counting the Homeless* reports do not accurately capture the totality of overcrowding.

We have discussed this issue with members in the Northern Territory in relation to Indigenous households and we believe that a large number of Indigenous people who are accommodated by relatives/ people from their kinship groups on Census night would in fact meet the definition of secondary homelessness but are not identified as homeless because of a cultural obligation to accommodate relatives that is of paramount importance in Indigenous communities.

The massive discrepancy between the non-Indigenous and Indigenous count of those identified as secondary homeless, 'staying with friends/relatives' on Census night in the NT provides evidence that this may in fact result in a significant undercount of Indigenous people in this category of homelessness. On Census night in 2006, over 2000 non-Indigenous people were identified as secondary homeless, staying with friends and relatives compared with just 157 Indigenous Territorians^{viii}.

Given that Indigenous people make up more than one third of the population identified as homeless on Census night in the NT^{ix}, it would seem plausible that Indigenous people with no fixed address of their own who are staying with family/kin are not identifying/identified as homelessness for the cultural reasons outlined above.

The potential for undercounting of secondary homelessness within Indigenous households is of course not confined to the Northern Territory but will exist wherever Indigenous people live, including within Indigenous households in regional centres and capital cities.

According to the ABS:

“...there were around 20,700 overcrowded Indigenous households (14%) and 102,400 Indigenous people (27%) living in overcrowded conditions in 2006. There has been some improvement in rates of overcrowding, with the proportion of Indigenous households that were overcrowded decreasing from 16% in 2001 to 14% in 2006...”^x

Based on our consultations with Indigenous workers in the housing and homelessness sector and members in the Northern Territory, Queensland, South Australia, Victoria and Western Australia, Homelessness Australia believes that a significant proportion of this group would meet the cultural definition of secondary homeless- staying with friends and relatives on Census night but would not be counted as such, largely because of the cultural reasons outlined above. In the view of Indigenous people in this housing situation, they are not homeless and would therefore not identify as such on a Census household form.

Homelessness Australia recommends that the ABS consult relevant Indigenous agencies to determine how homelessness disguised as overcrowding can be more easily identified. We would support the allocation of a proportion of the ABS funding to facilitate the develop of strategies that more easily enable Indigenous people living in overcrowded households (with no conventional occupancy or tenancy rights to the dwellings in which they are staying on Census night) to be identified and counted as experiencing homelessness.

Example #4: People sleeping in the long-grass in the Kimberley and Pilbara regions of WA and the Darwin-Daly district in the NT

A number of members have raised concerns with Homelessness Australia about the likelihood that high numbers of people often referred to as living in the “long-grass.” According to a 2001 report by the Australian Institute of Health and Welfare:

“...In the Darwin and Palmerston region of the Northern Territory, there are a number of people, many of them Indigenous, originally from remote communities, living 'an itinerant lifestyle' otherwise known as 'living in the long grass'...”^{xi}

After speaking with service providers in Western Australia, Homelessness Australia became aware that there were locations in the north-west of that state with groups of people who share similar characteristics to those in Darwin and Palmerston. Given the fact that the Census is conducted in August (dry season), the total number of people living in this circumstance is likely to be significant and owing to the itinerant nature of this group, it is highly unlikely that people in this circumstance would be easily identifiable to Census collectors.

While typically perceived to be an Indigenous homelessness issue, information provided to Homelessness Australia indicates that a significant proportion of people living in this circumstance do not identify as Aboriginal or Torres Strait Islander but may in fact be itinerant or seasonal workers or people seeking work in the mining industry. A number of Homelessness Australia’s members have indicated that they

believe that a high proportion of people “living in the long grass” would not be counted as homeless.

This is because of the nature of their accommodation circumstances, transience and the geographic difficulties of reaching them on Census night.

We believe they should be counted as homeless because their circumstances clearly meet the cultural definition of primary homelessness and it is not clear that people staying in the ‘long-grass’ have an alternative usual place of residence which they occupy continuously for more than six months.

Example #5: People in hotels/motels paid for by either brokerage funds from homelessness services or by state housing vouchers

People who are unable to be accommodated by homelessness services or state/territory housing Departments are frequently provided with brokerage funds or vouchers to enable them to secure temporary accommodation in hotels or motels. Often they are families, including women and children escaping domestic and family violence and given the fact that they are often staying in hotels/motels frequented by holiday makers they are likely to be excluded from the homelessness count.

While Homelessness Australia is aware that both the ABS and Chamberlain and Mackenzie have developed strategies to enable them to differentiate between those staying in hotels/motels as a form of emergency accommodation and people who are travelling, it is likely that a number of this group would not be identified as homeless on Census night. Often they will pay the standard room rate using funds provided by homelessness services and will for this reason not be differentiated from ‘tourists’ reporting a usual address elsewhere.

Example #6: People staying with friends/relatives in public housing who are not named on the lease (due to rules prohibiting sub-letting)

There is broad agreement among our members that a significant number of highly disadvantaged people are accommodated by friends or relatives who are tenants in public housing dwellings.

There are rules in residential tenancy agreements entered into with state/territory housing authorities that specifically prohibit tenants from “sub-letting” (allowing people to occupy the premises who are not named on the lease, often in return for payment not disclosed to the landlord/housing manager). This means that if people are living in public housing under “sub-letting” arrangements, the ‘householder’ who is named on the lease is unlikely to disclose this on the Census form because if they are discovered it may jeopardise their tenancy.

It is unclear how many people are likely to be in this situation but a survey of our members conducted over the course of researching for this paper revealed it was commonplace for clients to reveal this living circumstance to support workers. Often these living situations break down and people move from here into other sectors of homelessness.

Example #7: People ‘sleeping rough’ in rural and remote locations

In our submission to the ABS review we drew attention to this in relation to Indigenous people in the Northern Territory however we have consulted with service providers in regional, rural and remote locations and determined that it is likely to be more difficult to locate people who are sleeping rough outside of cities and regional centres regardless of their cultural background. This is because it is likely that while service providers assist Census collectors to locate people who are sleeping rough as a component of the ABS’ homeless enumeration strategy, it is not going to be possible to locate all of the people in rural and remote areas who are living in this circumstance on Census night.

This is likely to be particularly true if they are staying in National Parks or bushland settings where you would not reasonably expect Census collectors to visit unless they contained camping grounds. Homelessness Australia believes it is logical to expect that given the vast geographical size of Australia, it will not be possible for Census collectors to reach every person staying in sparsely populated areas of Australia on Census night. We therefore believe that this needs to be considered as another example of people who may not be counted as homeless on Census night but who would in fact meet the definition of primary homelessness. It provides further evidence in our view of the need to adjust for potential undercounting.

Example #8: Primary Homelessness and Indigenous People

Homelessness Australia has some concerns about the accuracy of primary homelessness counts in the Northern Territory. Our contacts from member services and peak bodies in that jurisdiction have expressed concerns about the accuracy of the homelessness count in the Northern Territory. Homelessness Australia notes that in the two territories, the count was conducted on Census night only. In the ACT where the population is concentrated in a very small geographical area, this is not likely to be too problematic. In the Northern Territory, where the population is spread over more than 1,000,000 square kilometres and where there are perhaps more remote communities than in any other jurisdiction, it could be argued that identifying all people who are homeless would not be possible because the count is confined to a single night. Between 2001 and 2006 the number of rough sleepers in the NT declined by 26%^{xii}. Service providers in the NT have informed Homelessness Australia that no significant expansion of services to accommodate rough sleepers was embarked on over that period and it is therefore highly unlikely that such a significant decline in the number of rough sleepers counted on Census night in the NT can be explained by them having secured stable accommodation.

We believe that this may also contribute to undercounting of homelessness in the Northern Territory.

Many Indigenous people don’t see themselves as homeless if they are living on country and there are familial and kinship connections all around them, they are therefore not going to identify as homeless to Census collectors, even though they may meet the ABS cultural definition. Our focus here is the Northern Territory because this is where members who have conveyed these concerns to us are located.

That said, it is highly likely that a proportion Indigenous people who are sleeping rough 'on country' in other jurisdictions are also not going to identify as homeless because they are "spiritually housed" on the land to which they have cultural and spiritual connections.

We support greater efforts being made to identify all Australians whose living circumstances on Census night mean that they meet the ABS cultural definition of homelessness being identified as such on Census night. Homelessness Australia acknowledges the importance of the concepts of 'spiritual homelessness' and conversely being 'spiritually housed' on country.

That said, we also believe it is important that we ensure that as many Australians as possible who are living in circumstances that meet the ABS cultural definition of primary homelessness on Census night are counted as homeless on Census night.

Responding to the discussion paper

As the ABS is already aware, Homelessness Australia has a number of significant concerns with a number of the conclusions arrived at in the discussion paper, in particular those that seek to arbitrarily remove large numbers of people from the secondary homelessness- staying temporarily with friends/relatives count.

In the paragraphs below, Homelessness Australia offers a summary of the main findings contained in the ABS Discussion Paper and our response based on consultations with our member services.

Difference between Counting the Homeless Estimate and ABS Estimate

- The ABS has revised the 2001 and 2006 national homelessness counts downwards by approximately 40% from 104,676 people (Counting the Homeless 2006) to 63,472 people (ABS Discussion Paper, 2011, p.4).

Table 1.1 on page fourteen summarises the new estimates for each sector of the homeless population that have been arrived at by the ABS following their methodological review of *Counting the Homeless 2006*.

The ABS review has determined that there has been an over-count in all categories of homelessness previously adopted but that the ABS has developed a fifth category of homelessness called 'persons in other temporary lodgings' comprised of 1,970 people it does not believe meet the definition of primary, secondary or tertiary homelessness.

The size of the over-count in all categories is statistically significant, particularly in the case of the primary homelessness count and the secondary homelessness (staying temporarily with friends and relatives count).

This has resulted in the ABS making significant downward adjustments to these categories of homelessness that have caused a great deal of concern and disquiet within the homelessness sector.

Table 1.1: Overview of proposed review changes to homeless estimates, 2006:

Category	2006 CTH estimate	ABS Review estimate (a)	Difference (n)	Difference (%)
Boarding Houses	21 596	16 828	-4 768	-22.1
SAAP	(b) 19 849	17 331	-2 518	-12.7
Friends/Relatives	(c) 46 856	19 579	-27 277	-58.1
Improvised Dwellings/Rough Sleepers	16 375	7 764(d)	-8 611	-52.5
Persons in other temporary lodging	N/A	1 970	+1 970	+1.8
Total:	104 676	63 472	-41 204	-39.3

- (a) This is the mid-point of the likely range of the new estimate
 (b) This number is derived from AIHW SAAP Collections except for Victoria.
 (c) Includes Analysis from non-Census sources.
 (d) Also includes a reduction of 200 because of a Census collector error because of inclusion in CTH of system generated records.

Source: Chamberlain Chris, Mackenzie, David Counting the Homeless 2006 ABS Catalogue #2050.0, Table 3.5, p.21. Census 2006.

Note: The above estimates are median estimates (mid-point data between the ABS lowest and highest estimates).

All of the reductions in estimates produced in the above table are statistically significant.

A summary of the major changes outlined in the ABS Discussion Paper is provided below with a response from Homelessness Australia based on feedback received during consultations with our Board, Councils and membership.

Boarding Houses

- According to the ABS review, 5300 people were added by Chamberlain and Mackenzie to the raw Census night data on the number of people counted as staying in boarding/rooming houses by Census collectors (ABS Discussion Paper, p.33).
- The ABS review position is to remove 3000 of these people because the review has determined that their inclusion is inconsistent with the methods stated in *Counting the Homeless*.
- Overall the ABS review removes 4768 people from the Counting the Homeless tertiary homelessness count of 21 596 but reallocates 1970 people to a new category of homelessness (ABS Discussion Paper, p.32.)

New trends in tertiary homelessness: 2001-2006

- In 2001, the ABS Review estimates that 23 749 people were accommodated in boarding houses on Census night.
- In 2006, the ABS review estimates that this number had declined to 16 828. This represents a reduction of 29% between 2001 and 2006.
- The ABS has determined that they have confidence in their estimate set arbitrarily within a margin of +/-10% putting the revised boarding house figure between 15 000 and 19 000 (ABS Discussion Paper, p.33).

Despite the fact that the boarding house sector is believed to be in decline, the ABS must be asked to explain why if their new methodology is appropriate for performance indicator construction, the boarding house population declined by 29%.

Even accounting for the improved economic conditions described in the ABS paper this is a significant reduction and it warrants further exploration. Homelessness Australia supports efforts being undertaken by the ABS to better identify premises as boarding/rooming houses.

Homelessness Australia is aware of reports that private proprietors have established boarding houses in private dwellings in outer-suburbs while boarding houses in inner-city areas are believed to be in decline. It may be prudent to consult with both local Government and providers of homelessness services over the course of engagement around the conduct of each Census.

Local Government is vested with responsibility for licensing and inspecting boarding/rooming houses in most jurisdictions and service providers reluctantly refer clients to boarding/rooming houses when services are unable to accommodate them. Workers from both would be in a good position to identify boarding houses in the area, even small ones which would appear to Census collectors as a standard private dwelling.

Persons staying in SAAP Accommodation

- The ABS review has removed 2518 people from the SAAP estimate reached by Chamberlain and Mackenzie in *Counting the Homeless 2006* (ABS Discussion Paper, p.36).
- The ABS review does not believe that counting 'support periods' that cover a period of time beyond merely Census night is appropriate when seeking to enumerate a point in time count of the number of people accommodated in specialist homelessness services.
- The ABS believes that it has corrected estimates to align with the stated methodology in the *Counting the Homeless* reports. The ABS believes that this correction will eliminate the possibility of double counting of people whose support periods include Census night but who were not staying in a homelessness service on Census night and hence may have already been counted elsewhere in the Census data.
- Overall the ABS Review has removed 2518 people from the Counting the Homeless Secondary Homelessness (people in SAAP) count reducing the figure from 19 849 to 17 331 (ABS Discussion Paper, p.36).

New trends in persons accommodated in SAAP based on ABS review.

- In 2001, the ABS review estimates that 13 420 people were staying in SAAP accommodation on Census night.
- In 2006 the ABS review estimates that this number had increased to 17 331. This represents an increase of 29.1% between 2001 and 2006.

If we analyse the SAAP data for the period 2001/02 to 2006/07, we can see that the number of clients supported increased for 93,000 to 118,800 during that period, an increase of 27.7%^{xiii}.

This broadly accords with the increase in persons staying in SAAP on Census night between 2001 and 2006. Given that trend indicated by the ABS review estimate for persons accommodated in SAAP on Census night 2006 can be broadly verified by comparing it to the SAAP data, Homelessness Australia is broadly satisfied with this adjustment.

Friends and Relatives

The ABS review has significantly reduced the number of people counted as experiencing secondary homelessness (staying with friends and relatives) on Census night. The review has removed 27 277 people from the friends and relatives count reducing homelessness in this category by more than 58%. The new figure was arrived at by the ABS after cross-tabulating other sources of data drawn from Census forms (ABS Discussion Paper, p.4).

The ABS claims that Chamberlain and Mackenzie have assumed that all people reporting no usual address and enumerated in private dwellings are homeless and being accommodated temporarily by friends or relatives. Homelessness Australia responds here to four groups that we are particularly concerned about; so called 'grey nomads', new migrants, young people and people who identify as Aboriginal or Torres Strait Islander.

'Grey nomads'

The ABS pays specific attention to the phenomenon of grey nomads over the course of the discussion paper. Concern was expressed that there is a growing group of people aged 55 and over who are living transient life styles but who have assets and that large numbers of people in this group were being incorrectly identified by Chamberlain and Mackenzie as homeless when they are in fact, so called 'grey nomads' who are in mobile transport on holiday for many months of the year. This was evident in part because they were in so called 'desirable holiday destinations'.

While Homelessness Australia agrees that there are significant numbers of older Australians who frequent caravan and tourist parks in retirement, members who provide services to older Australians have indicated that they are aware of a large number of impoverished older people who live "from pension day to pension day" and may travel to a new destination each fortnight but who are not on holiday. There is concern that they may in fact meet the definition of homelessness but be misclassified as part of the so-called 'grey nomad' phenomenon.

New Migrants

- The ABS excluded 1309 more people from the friends and relatives count on the basis that they were new migrants who had been in Australia for not more than 7 months.

"It is assumed that they had not yet had the time to decide upon the purchase or rent of a particular dwelling and report correctly in the Census as not having a usual address at which they had spent or expected to spend 6 months or more in the Census year" (ABS review, p.41).

If they have not yet had the time to purchase and/or rent a property, by definition they are 'homeless' at the point in time at which the Census is conducted.

Homelessness Australia is not yet convinced that this group should be arbitrarily excluded from the secondary homelessness- staying temporarily with friends and relatives count. We believe they should remain in the count if they do not have a 'usual residence' to which they can claim title or tenancy/occupancy rights on Census night.

Totality of Exclusions

- Overall the ABS has excluded 12,940 adults from the friends and relatives count for the reasons outlined above. Homelessness Australia is not convinced that these exclusions are appropriate. This is a significant number of people and the new assumptions require more explanation from the ABS. (ABS Discussion Paper, p.42)

While Homelessness Australia accepts that by cross-tabulating the Census data, the ABS has not been able to establish definitively that this group of almost 13,000 people were experiencing homelessness on Census night, it is not clear to us that the opposite has been conclusively determined either.

Young People

The group of persons that has caused the most angst and disquiet within the homelessness sector because of the sheer magnitude of the reduction in the number estimated to have been experiencing homelessness on Census night is young people aged 12-18 years.

The ABS states in the Discussion Paper that the *Counting the Homeless* methodology initially classifies 6378 young people aged 12-18 as experiencing homelessness on Census night. Adjustments are then made by Chamberlain and Mackenzie to account for what they and many people within the youth sector believe is a significant under count of youth homelessness that can be attributed to the way in which the Census is conducted and the hidden nature of youth homelessness.

The Counting the Homeless methodology also uses non-Census data sources including SAAP Data and data obtained from the National Census of High School Students (NCHSS) to arrive at the figure of 21,940 people (ABS Discussion Paper, p.42).

Before dealing with the new assumptions made by the ABS to account for what is a drastic and significant reduction in the youth figure Homelessness Australia would like to draw attention to a definitional issue. The ABS paper refers to young people consistently as 'runaways' in its descriptions.

As a peak body, Homelessness Australia rejects this reference entirely. It is outdated and does not accurately reflect the complex nature of youth homelessness. Homelessness Australia will raise this definitional issue with the ABS during the consultation process.

The exclusions

- The ABS Paper states that there were 39 966 people aged 12-18 who were visiting private dwellings The ABS paper states that this is the pool from which Chamberlain and Mackenzie source the 15 562 young people not immediately enumerated in the Census data.
- The review notes the difficulty that exists in trying to differentiate between young people who were 'sleeping over' at friends or relatives places with the permission of their parents and those unable to return home who are couch surfing.
- The ABS states that after applying its own corrections to some of the *Counting the Homeless* methodology, the gap between the Census based count and the Chamberlain and Mackenzie figure rises to approximately 16,500 young people.
- The ABS has assigned young people enumerated in the Census as staying in other households to five categories (see table 1.2 below) (ABS, p.43).

Table 1.2: Visiting youth with a reported usual address (aged 12-18)

	Visiting Circumstance	Number
A	Visitor Only Households	6200
B	Travelling with one or both parents or other young people	8600
C	Youth accompanied by children aged <12	2100
D	Lone youth visiting a lone person household	3100
E	Other	20 000
	Total visiting youth	40 000

Homelessness Australia does not agree with the new assumptions made by the ABS for this group. We are not convinced that the ABS has provided sufficient justification for the exclusion of so many young people from the homelessness count.

Homelessness Australia urgently seeks further evidence and explanation from the ABS to justify the blanket exclusion of such a significant pool of young people from the homelessness count. We accept that the ABS cannot include people in the raw homelessness count if their homelessness is not clearly apparent in the Census data.

That said, Homelessness Australia is not convinced that the ABS have made the case for the removal of 27 277 people from the homelessness count in this category.

We are particularly concerned about the removal of more than 16 000 young people from the homelessness count. We do not believe that the decision to exclude 75% of young people from the homelessness count has been adequately accounted for.

Furthermore, we do not believe that the new breakdown of the categories of homelessness in which the review estimate states that young people aged 12-18 were located on Census night 2006 accords with what practitioners know about youth homelessness or what research into youth homelessness from both Australia and overseas has documented.

The table on page 73 of the ABS Discussion Paper provides a breakdown of homelessness by age and new estimates of the number of people from each age group who the ABS believe were found to be in different sectors of homelessness on Census night.

When we look closely at where the ABS claims that people aged 12-18 years were accommodated it appears that the new data does not tally with what the sector understands about youth homelessness (see table 1.3 below)

Table 1.3: Young people aged 12-18-Homeless Operational Groups

Operational Group	Total (n)	%
Primary Homelessness	631	12
SAAP	2731	50
Friends and Relatives	1055	19
Boarding Houses	902	17
Other Temp Lodging	115	2
Total:	5424	100

As table 1.3 shows, the ABS has concluded that approximately half of all young people aged 12-18 who were experiencing homelessness on Census night in 2006 were accommodated by SAAP services. While this age group are heavy users of SAAP services this does seem proportionally very high.

The ABS has also determined that only 19% of the people experiencing homelessness in this age group were staying temporarily with friends and relatives on Census night.

Based on what practitioners in the youth sector know about the dynamics of youth homelessness as well as what the literature tells us, we believe this an underrepresentation.

It is widely known and accepted that a high proportion of young people experience homelessness in the form of 'couch surfing', that is staying temporarily with friends or relatives or even associates because they are unable to return to their family home.

The ABS has attempted to explain the exclusion of 16 000 young people by claiming that most of them are 'sleeping over' with permission from their parent(s) or guardian(s).

They have not provided sufficient justification in the paper to account for this assumption given that the Census is conducted on a Tuesday night (a school night). It is not reasonable to assume that the vast majority are 'sleeping over' with permission. This argument may be more persuasive if the Census was conducted on a Friday or Saturday night.

The third assumption that does not accord with our understanding of youth homelessness is the tertiary homelessness (people staying in boarding houses) figure.

We know that service providers are extremely reluctant to put people aged under 25 in boarding houses let alone those aged 12-18. We also know that young people generally don't stay in boarding houses in great numbers or return to them after an initial stay due to the nature of the client group who use the boarding house sector and the fact that many boarding houses are sites of theft, standover tactics, violence and intimidation. While it is possible that some of those aged 12-18 are staying in boarding houses with parent(s) or guardian(s) as a family unit on Census night. Homelessness Australia does not believe that this proportion would roughly equate to that of the 'couch surfers' It simply does not accord with practice experience.

The National Census of High School Students

The ABS notes that the starting point for the estimate of youth homelessness arrived at in the *Counting the Homeless* report is the National Census of High School Students (NCHSS).

The ABS has expressed the view that they are not in favour of using this data to influence a Census night count of homelessness amongst young people who are aged 12-18 because it collects data over a period of more than one night and because they have concerns about aspects of the methodology and the quality of the data. The Discussion Paper states:

"...the NCHSS may over count the number of homeless youth in public and Catholic secondary school systems, largely due to:

- *Some ambiguity in the questions asked of schools;*
- *The nature of reporting, for such a mobile population, being unlikely to approximate a Census night measure; and*
- *The methodology to upwardly adjust by 20.5% may not be well founded... However, the estimates for homeless youth outside these settings may overstate the count even more".*
(ABS Discussion Paper, p.47)

It is clear that the ABS do not believe that the youth homelessness problem is as significant as either practitioners or other researchers in the field of homelessness.

Whereas the Burdekin Report *Our Homeless Children*, the National Youth Commission Report, *Australia's Homeless Youth* and Chamberlain and Mackenzie believe that one third of homeless young people remaining enrolled in schools is a reliable estimate, the ABS disagrees believing the figure is closer to 50-60%.

This new assumption automatically reduces the youth homelessness (12-18 year olds) estimate by one third. This is based on SAAP data which showed that of the

young people who present to homelessness services in this age group as accompanying children, 59% are still enrolled in school.

Conversely, it could be argued that young people who are experiencing homelessness in family units that have managed to stay together are significantly more likely to remain enrolled in education than young people who have left or have been forced out of the family unit.

Homelessness Australia is not convinced that 75% reduction in the number of young people aged 12-18 that the ABS has determined were experiencing homelessness on Census night has been adequately justified in the ABS Discussion paper. The final conclusion for young people reached by the ABS in its review is extremely concerning:

“...The conclusion reached in this review is that the methods used by Chamberlain and Mackenzie appear to create a very large youth homeless population on Census night that cannot be reasonably related to Census data...” (ABS Discussion Paper, p.48)

Homelessness Australia does not believe that all young people who are experiencing homelessness can be captured using Census data alone. We acknowledge that the ABS has concerns about the ability of the school Census to capture homelessness amongst secondary school students at a ‘point in time’.

Homelessness Australia therefore recommends that FaHCSIA provide funding for researchers to conduct a national census of high school students or an equivalent survey with similar coverage but using a methodology that does allow for the measurement of homelessness amongst secondary school students on a point in time basis.

Improvised Homes, Tents and Sleepers Out: Primary Homelessness

Consistent with the rest of the new assumptions made by the ABS in the Discussion Paper, the ABS believes that the figure of 16,375 for people experiencing primary homelessness on Census night overestimates the number of people sleeping rough or in improvised dwellings.

Unlike many of the other assumptions in the paper, Homelessness Australia believes that some of the exclusions from the category of primary homelessness flagged in the ABS paper are appropriate.

There are examples of people living in dwellings that would appear to be improvised to Census collectors that are in fact functioning as housing that does not meet the definition that the ABS believes is appropriate for primary homelessness. The ABS cites a number of examples including:

- Construction workers who are employed in the development and construction of new suburbs and are living in on-site sheds but who may own a home or be renting a property elsewhere.
- “Hobby farmers” and other owner-builders living in sheds that the ABS describes as “part of the property’s ongoing infrastructure” and “quite

habitable” albeit by people “not living in a standard suburban way” (ABS, p.51) but which the ABS determines that Census collectors would incorrectly identify as ‘improvised dwellings’, thus including occupants in the primary homelessness count. The ABS states that “particular examples were reviewed in the context of a wide range of reported Census variables to establish the nature of these “hobby farmers”/owner-builders and general rules were applied to the entire group of people enumerated in improvised dwellings to establish likely homelessness” (ABS Discussion Paper, p.51).

While Homelessness Australia believes it is appropriate to review this category and to exclude some people from the primary homelessness count due to home ownership status we are concerned that the ABS has excluded a very large number of people from this category of homelessness.

Given that “offering supported accommodation to all rough sleepers who seek it by 2020” is one of the two headline goals articulated in the White Paper it is imperative that the primary homelessness count derived from the Census is as accurate as possible

Homelessness Australia is committed to continuing to work with the ABS to realise this objective.

Homelessness amongst Indigenous Australians

The ABS acknowledges in the Discussion Paper that Indigenous Australians are undercounted in the Census data and in the *Counting the Homeless* data for the following reasons:

- Under-enumeration of Indigenous persons in the Census;
- The nature of reporting ‘no usual address’ for Indigenous visitors’ to a dwelling
- The classification of a dwelling structure.

The ABS note that Indigenous Australians have been undercounted in the 2001 and 2006 Censuses by 11.5% in 2006 and 6.1% in 2001 (ABS Discussion Paper, p.53).

Homelessness Australia agrees with the ABS about the likelihood that the figure arrived at in both *Counting the Homeless* and the ABS review significantly understates the extent of Indigenous homelessness in Australia.

Table 1.4: Homelessness amongst Indigenous people

Homelessness Category	Number
Primary Homelessness	2 095
SAAP	2 692
Friends and Relatives	872
Boarding Houses	859
Other Temporary Lodging	137
Total	6 655

We are particularly concerned about the very low count of Indigenous people experiencing secondary homelessness 'staying temporarily with friends and relatives'.

As table 1.4 on page 22 illustrates, the methodological review has only been able to identify 872 people Australia wide who were accommodated by friends and relatives on Census night who met the definition of secondary homelessness.

The above figures are interesting when contrasted with the non-Indigenous population. According to the ABS, the proportion of Indigenous people staying with friends and relatives is just 13.1% of the homeless population compared with 34% for the non-Indigenous population.

Given what we know about the cultural obligation to house extended family and people from kinship/skin groups who may have no tenancy or occupancy rights to the property, a figure of just 872 Indigenous people staying with friends and relatives who are otherwise experiencing homelessness across Australia seems completely unrealistic and completely inappropriate for performance indicator construction given what the ABS' own data tells us about the extent of overcrowding amongst Indigenous households as discussed earlier.

Homelessness Australia is not convinced that the above numbers are an accurate reflection of the totality of Indigenous homelessness. We are particularly concerned about the secondary homelessness (staying temporarily with friends and relatives) count.

Homelessness by Age

Table 1.5 : Homelessness by Age

<u>Age Group (CTH)</u>	<u>Number Homeless on Census Night</u>	<u>(ABS review)</u>	<u>Change (n)</u>	<u>Change %</u>
0-12 years	12 133	7 552	-4 581	-37.7
12-18 years	21 940	5 423	-16 517	-75.3
19-24 years	10 504	7 992	-2 512	-23.9
25-34 years	15 804	11 893	-3 911	-24.7
35-44 years	13 981	10 600	-3 381	-24.2
45-54 years	12 206	8 757	-3 449	-28.2
55-64 years	10 708	6 332	-4 376	-40.8
65 or older	7 400	4 920	-2 480	-33.8
Total:	104 676	63 469	-41 204	-39.3

As the table above indicates, the ABS Review of the Counting the Homeless methodology has resulted in a dramatic reduction in overall homelessness but particularly a major reduction in youth homelessness and homelessness amongst older Australians. We remain concerned about the statistically significant nature of the differences between the figures arrived at in the *Counting the Homeless* reports and the figures arrived at by the ABS as a result of their review of the *Counting the Homeless 2006* methodology.

In order to fully understand the totality of the exclusions it would be useful for Homelessness Australia (time permitting) to have access to the Census tables that the ABS have used to re-classify people counted by Chamberlain and Mackenzie as homeless.

While the ABS has provided some explanation in the discussion paper for the exclusions they are significant in number and having access to the Census tables may improve the sector's understanding of the rationale for the exclusions.

Comparison between 2001 and 2006 based on ABS Review estimates

The ABS has also provided a reviewed estimate for the 2001 Census. This comparison data is provided below:

Table 1.5: Change in homeless population between 2001 and 2006 (ABS, pp.4-5)

Category	2001	2006	Change (n)	Change (%)
Boarding houses	23 749	16 828	-6921	-29.1
SAAP	13 420	17 331	+3911	+29.1
Friends/relatives	17 877	19 579	+1702	+9.5
Primary H/less	8 933	7 764	-1169	-13.8
Temp. Lodging	1 395	1 970	+575	+41.2
Total:	65 384	63 472	-1 912	-2.9

As the table above indicates, the ABS review estimates that the overall population of Australians who were experiencing homelessness on Census night declined by 2.9% between 2001 and 2006. The ABS attributes this to improvements in economic conditions during that time period.

The statistically significant percentage increase in people accommodated by SAAP on Census night roughly correlates with the increase in the overall number of people supported by SAAP services over the course of the financial year between 2001/02 and 2006/07.

The decline in the number of people staying in boarding houses on Census night between 2001 and 2006 is statistically significant and interestingly corresponds exactly to the percentage increase in the number of people the ABS believes were accommodated in SAAP services, though the decrease in the number of people accommodated in boarding houses was significantly greater given that they were found to have accommodated more than 10 000 more people than SAAP services in 2001.

There is a body of evidence that indicates that the boarding house sector has been in decline for over a decade now and it is likely that boarding houses did accommodate fewer people who were experiencing homelessness on Census night 2006 than they would have on Census night in 2001. The size of the decrease estimated by the ABS is statistically very significant however and may warrant further investigation. As noted above we have received reports that while larger boarding houses in inner-city areas are in decline, smaller ones are emerging in suburban and outer-suburban areas that could be readily confused with private dwellings.

Interestingly despite citing improved economic conditions as a reason to explain the slight decrease in overall homelessness between 2001 and 2006, the ABS review has determined that between 2001 and 2006 the proportion of people staying temporarily with friends and relatives on Census night increased by just under 10% between 2001 and 2006. This may also warrant further investigation.

The ABS review found that the population of people they believe meet the cultural definition of primary homeless on Census night (of which they estimate more than 80% are rough sleepers) declined by 13.8% between 2001 and 2006. This is again primarily attributed to improved economic conditions.

The ABS has estimated that their newly devised category of persons 'in other temporary lodging' increased by more than 40% between 2001 and 2006. While it represents a small number of people in relation to the overall count, an increase of 40% is very significant and may also warrant further investigation.

Given that the ABS has conducted an extensive review of the methodology and added a new category of 'temporary lodging' to the count, we believe the ABS must also consider including 'marginal residents of caravan parks' in the homelessness count. Homelessness Australia is aware that service providers often use caravan parks to accommodate people experiencing homelessness in regional and rural areas.

Outside of our cities they fill the same gap that boarding houses fill and given that they offer diminished security of tenure in comparison to a residential tenancy agreement and that people not staying in cabins also lack access to their own kitchen and bathroom facilities, the standard of accommodation shares many characteristics with that of boarding/rooming houses.

In addition to supporting the four future directions outlined in the ABS Discussion Paper, Homelessness Australia is committed to furthering the review process by undertaking a number of additional future directions and next steps aimed at ensuring that we complete the review process with a methodology that is amenable to both the homelessness sector and the ABS. These are outlined in the final pages of our submission.

A note on the use of the general social survey

While Homelessness Australia accepts that there are limitations in estimating the totality of homelessness in Australia relying on Census data alone we have some concerns about the appropriateness of using the general social survey (GSS) for the purposes of comparison. In its description of the GSS the ABS notes:

"...Only people who were usual residents of private dwellings in Australia were covered by the survey. Private dwellings are houses, home units and other structures used as private places of residence at the time of the survey. People usually resident in non-private dwellings such as hotels, motels, hospitals and caravan parks were not included in the survey. Usual residents are those who usually live in a particular dwelling and regard it as their own or main home... At 30 June 2006, there were 376,000 people aged 18 years or over living in non-private dwellings throughout Australia. The

exclusion of these people (2% of the population) is unlikely to impact on the estimates included in this publication...^{xiv}

While the inclusion of questions pertaining to accommodation circumstances in the GSS may provide useful information about experiences of homelessness and duration of homelessness, it is highly likely that due to design the GSS will not be extended to large numbers of people experiencing homelessness because they will not be residing in private dwellings at the time that the GSS is conducted.

This coupled with the undercount of two percent in the GSS which while generally speaking may not be significant when seeking to gain an overall picture on most social statistics and determinants is statistically significant in the context of homelessness. This is because large numbers of people experiencing homelessness are likely to be found within the two percent missed by the survey who are not residing in private dwellings. Equivalent efforts must be made to reduce undercounting in the GSS as are being made in the Census. This would improve the comparability of the datasets.

Discussion of on-going concerns

Having canvassed the Discussion Paper released by the ABS on 31 March, Homelessness Australia has a number of on-going concerns about the findings of the methodological review. These relate to:

- The significant reduction in the youth homelessness count. Homelessness Australia does not believe the ABS has provided adequate justification for the 75% reduction in the count of people aged 12-18 years.
- The significant reduction in the overall secondary homelessness count. Homelessness Australia is not convinced that the ABS has provided us with sufficient information to adequately explain the exclusion of 27 277 people from the secondary homeless-staying with friends and relatives category.
- Indigenous homelessness, particularly that which is masked by overcrowding. The ABS' own data on overcrowding amongst Indigenous households suggests that over 102,000 Aboriginal and Torres Strait Islander people live in overcrowded households. According to its discussion paper, only 873 of this group were homeless in this circumstance on Census night.
- That translates to approximately 0.75% of all Indigenous people in overcrowded households.
- This would not seem to reflect the cultural realities of Indigenous homelessness. The ABS has acknowledged that it generally undercounts Indigenous people in Census data but Homelessness Australia believes a greater commitment should be made to accurately counting people whose homelessness is masked by overcrowding.
- Tertiary homelessness. According to the ABS Discussion Paper, the number of people staying in Boarding Houses declined by 29% between 2001 and 2006. Even accounting for the reported decline in the boarding house sector this reduction is statistically very significant and warrants further investigation.

While we support the opportunity to review the methodology, we also think it is vital that other researchers with knowledge of the complexities of homelessness and who have been leaders in the field are not completely sidelined by the ABS.

They have provided us with very useful qualitative information about the complexities of homelessness in Australia and its particular dimensions across different regions. Their work has and continues to provide the most comprehensive source of information about homelessness in Australia to date. Their work should be acknowledged and respected even if statisticians disagree with the methodology employed.

Australia has enjoyed a remarkable consensus over the past two decades in homelessness. This broad agreement about its prevalence has ensured that collaborative action to address the issue has occurred.

Homelessness Australia remains extremely concerned that the lasting legacy of this review will be that the consensus that has existed for many years now between the sector, Government, the ABS, AIHW and researchers may well be shattered if the findings of this review are not properly accounted for. Based on feedback we have received from members, particularly in the state of Victoria there are early signs that this may already be occurring. Should such a breakdown in consensus occur there could be lasting implications for the ABS, Government and the sector and most importantly, for the tens of thousands of Australians who are currently experiencing homelessness and need accommodation and support.

The Homelessness sector was re-energised in 2009 following the release of the White Paper and the partnership between the sector and Government was arguably strengthened as a result of the commitments made in the White Paper that were matched by significant new investment. We are concerned that the commitments made in the White Paper which were based on the homelessness figures arrived at in the *Counting the Homeless 2006* may not be viewed with similar urgency when funding is re-negotiated in 2013 if Treasury subscribes to the view that the level of homelessness is half the level it was estimated to be in December 2008 when the White Paper was released.

We also remain concerned about the implications of this review in terms of its potential to shatter an extraordinary consensus that has existed between policy makers, academics and researchers, the AIHW, the ABS, FaHCSIA and the homelessness sector for at least fifteen years in terms of there being general agreement as to the nature and scope of the homelessness problem in Australia.

As the ABS notes the scale of the changes to the overall homelessness counts for each of the three categories are statistically significant. At the consultation in Sydney on 24 May, sector representatives and Homelessness Australia committed to assisting the ABS to identify mechanisms by which we can determine how to better identify people who may be experiencing homelessness within the Census data as well as other sources of data that may enable us to improve the enumeration of people experiencing homelessness.

Homelessness Australia acknowledges that capturing all Australians who are experiencing homelessness on Census night is an incredibly difficult exercise. The Census is a survey of households and as people experiencing homelessness are either hidden within other households or not residing in dwellings that meet the definition of conventional 'households', many will be missed or hidden within the Census data. In the Discussion Paper the ABS addresses the issue of undercounting in general. It estimates that as many as 3% of Australians are not captured in the Census data. This figure is arrived at after cross-checking with records from the births, deaths and marriages registrar. The ABS concludes that:

"...The PES estimate of the number of people who should have been counted in the 2006 Census was 20,402,459 people. The actual 2006 Census count for Australia was 19,852,973 people. The difference (549,486 people) is the net undercount for Australia..."^{xv}

This means that as many as 549,486 Australians were not counted on Census night. By its very nature, homelessness does in many cases not lend itself to be easily captured in a survey of households. Indeed if just ten percent of the 549,986 Australians not captured on Census night were people experiencing homelessness, that equates to almost 50,000 additional people in the homeless population who were not captured by the Census. Their inclusion means that the figure of 63,472 people counted as homeless in the review estimate would almost double. In relation to Indigenous Australians, the ABS acknowledges in the paper, that the undercount is significantly higher again. It is possible that a significant number of Aboriginal and Torres Strait Islander Australians who are experiencing homelessness, particularly primary homelessness are included in this pool of people missed by Census collectors.

While Homelessness Australia appreciates that the ABS cannot include people in the homelessness count who are not enumerated in the Census data we believe that there is an argument to adjust the raw Census night figure upwards to account for what we believe are significant numbers of people not enumerated on Census night because of their various circumstances of homelessness. Homelessness Australia notes with interest the figure estimating the incidence of homelessness over the course of a given year that was included in the summary of findings that preceded the Discussion Paper but that we were not able to locate in the body of the paper.

In the discussion of 'stock versus flow' measures, the ABS estimated that based on data from both SAAP and Reconnect, the number of people accommodated over the course of a given year is about six times greater than the number able to be accommodated on a single night. Using this six to one ratio, the ABS implied that as many as 340,000 to 440,000 people could experience a period of homelessness in Australia at some stage over the course of a given year. This warrants further investigation. If true it suggests that large numbers of Australians experience homelessness each year but that the experience of homelessness is, for the overwhelming majority short-term and episodic and that housing crisis is resolved rapidly (on average within two months).

Our members have also expressed concerns about the arbitrary exclusion of significant numbers of people based on information gleaned from a Census form and new assumptions that this triggers about their housing situation. The key groups we remain concerned about are:

- Older people who are mobile, not because they are 'grey nomads' but because they are living from pension day to pension day and caravan parks are their only option.
- Young people who appear to be on holiday, possibly in 'desirable destinations' but who are in fact experiencing homelessness.
- Women and children escaping domestic violence who may not be obviously identifiable as homeless.
- Other people whose homelessness is concealed because of the way in which the 'usual residence' question is answered.
- People staying in 'squats' who will not fill in Census forms.
- People staying in sub-standard accommodation while moving for reasons of employment.
- People in smaller private rooming houses in suburbs which are misclassified as private rental properties.

Conclusion

Homelessness Australia welcomes the opportunity to contribute to the methodological review of *Counting the Homeless 2006*.

In preparing the content of this submission, we consulted broadly with our Board, Councils and members who were able to identify a number of instances for us of people who would meet the cultural definition of homelessness but because of their circumstances on Census night would not be included in the count. These were outlined above.

We agree with the ABS that a number of the people included in the primary homelessness- improvised dwellings count could potentially be excluded from the primary homelessness count on the basis of other factors revealed on the Census form such as living on their own land.

We do not agree that income should immediately exclude a person from the homelessness count if their living situation matched that of others in different sectors of the homeless population. In other words, we believe that homelessness should be based on the amenity of the dwelling and the security of tenure that it affords as the cultural definition relates to the standard of accommodation and not other factors.

Homelessness Australia believes that while we remain concerned about the significance of the changes, progress has been made in a number of areas over the past three months. Following the consultation in Sydney on 24 May, Homelessness Australia and the ABS adopted a number of suggestions for moving forward on key areas. We are pleased to note that there is a willingness to work constructively together to achieve a resolution on areas where differences currently exist. These are detailed in the final pages of our submission.

We **are not** convinced that the revised estimate of 63,472 people experiencing homelessness on Census night is an accurate reflection of the true extent of homelessness on Census night 2006.

Homelessness Australia remains committed to constructively engaging with the ABS in the current consultation process. We sincerely hope that our concerns are taken on board through this process so that the Consensus we have enjoyed can be maintained.

Progress following the sector consultation

Following the ABS sector consultation in Sydney on 24 May, Homelessness Australia has identified a number of issues that we believe must be addressed as we further the review process. These are:

- The need to ensure that the expertise of the homelessness sector is valued and respected.
- The importance of ensuring that the sector is involved in the review process as it continues and in the future.
- We asked the ABS to understand that assisting the ABS with its homelessness enumeration strategy places a significant impost on homelessness services and workers have assisted previously because they had some confidence in the process and this has been diminished. The Meeting went some way to restore a more positive relationship. The field needs to have confidence in the figures.
- The ABS will examine ways to improve the count of young people experiencing homelessness through the use of other sources of data and the meeting was strong in stating we did not want ABS to have control or manage these other research or data projects. The field needs to have some ownership of this.
- The review estimate significantly alters the gender balance of the homelessness count as well as shifting the perception of the homelessness problem to be primarily affecting people aged 25-44 years. This could have profound implications for the organisation and funding of the homelessness service delivery system.
- The ABS suggested it would look into the possibility of establishing a sector reference group comprised of sector reps, academics and researchers and other interested stakeholders to examine issues such as the size and nature of the gap between the raw Census night count and actual numbers. The ABS has suggested a group of about 20 people with HA assisting in this.
- The ABS will negotiate with FACSIA regarding a “quality survey” of students identified as experiencing homelessness at six schools.
- The ABS will undertake costings for the conduct of such a survey. The field at the meeting asked to be involved in developing the scope and process.
- The ABS will publish a positioning paper on 31 July as promised but will extend the time-frame for further work in particular areas such as youth, caravans/boarding houses, etc. until the end of 2011.
- The ABS has agreed that the methodological review and enumeration strategy will continue to evolve over time. They are on-going pieces of work.
- The ABS will review other data sources that could be used to correct for undercounting (and over-counting) across a range of target groups.

- There was agreement with the field and ABS that the census is only one way of collecting data and should not be released as the only figures. The trends are essential and the number of homeless people over a year is important. The Specialist Homelessness services data is also a key data source for understanding this issue. The census data is not an exact science and figures may best be presented as a range.
- That ABS needed to factor in the % undercount found as 3% in the general population – even if only half a percent of this figure was considered homeless people that's a further 90,000 people.
- That significant work needs to be done to improve the collection for Aboriginal people.

Next Steps

Homelessness Australia has identified the following items as broadly reflecting the next steps to be undertaken in the methodological review.

- Homelessness Australia is committed to working in partnership with the ABS as the review progresses in the second half of 2011.
- Homelessness Australia will nominate representatives for the proposed reference group that the ABS has stated it will establish to provide on-going advice and feedback.
- Homelessness Australia will work with the ABS to provide additional information on hotels, motels and other temporary accommodation sites that are used by services to accommodate people who are turned away.
- Homelessness Australia will continue to advocate for the funding of a national survey of secondary school students as we believe it is a vital mechanism that allows us to ascertain the level of homelessness that exists amongst young people aged 12-18 years. We are happy to work with the ABS to determine what methodology might be appropriate to provide a point in time count.
- Homelessness Australia will work with the ABS to provide guidance around the design and development of a 'quality survey' of secondary school students in a select number of schools.
- Homelessness Australia will work with the ABS to provide additional information that may assist in reducing the likelihood of undercounting for particular groups.
- Homelessness Australia supports the work proposed by the ABS to improve the enumeration of Aboriginal and Torres Strait Islander Australians who experiencing homelessness.
- Homelessness Australia endorses the need to develop a nationally consistent definition of 'overcrowding' and to better identify Indigenous people whose homelessness is masked by overcrowding.
- Homelessness Australia believes consideration should be given to the inclusion of people classified as 'marginal residents of caravan parks' in the *Counting the Homeless* reports in the homelessness count.
- At this stage Homelessness Australia will encourage members to assist with the conduct of the 2011 Census in August, noting that assistance with the homelessness enumeration strategy places a significant impost on service providers.

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- ^x Australian Bureau of Statistics The Health and Welfare of Australia's Aboriginal and Torres Strait Islander Peoples, 2008, Australian Bureau of Statistics Catalogue number 4704.0, ABS, Canberra, 2010, table 4.11: Housing and Health.
- ^{xi} Australian Institute of Health and Welfare, The long grassers: a strategic report on Indigenous 'itinerants' in the Darwin and Palmerston area (Version 2), AIHW, Canberra, 2001, p.1.
- ^{xii} Chamberlain Chris; Mackenzie, David Counting the Homeless 2006- Northern Territory, et al, pp.28-29.
- ^{xiii} SAAP National Data Collection Agency, Government Funded Specialist Homelessness Services Annual Report 2008/09, Australian Institute of Health and Welfare, Canberra, 2010, p.91.
- ^{xiv} Australian Bureau of Statistics General Social Survey: Summary Results, Australia, 2006, cat. No. 4159.0, p.1.
- ^{xv} Australian Bureau of Statistics Catalogue 2940.0 - Census of Population and Housing - Details of Undercount, Aug 2006 .