

# *Many Ways Home:*

A National Homelessness Strategy for Australia



## **Homelessness Australia**

Homelessness Australia is the national peak body for the homelessness sector. We advocate for the rights of people experiencing homelessness and represent more than 1,000 homelessness support agencies as well as individuals and others who work with people experiencing homelessness. Our vision is to **Create a Framework for Ending Homelessness.**

Our policy work is guided by three reference groups which provide advice about key issues and represent diverse parts of the homelessness sector.

They are the:

- Women's Services Network (WESNET);
- National Youth Coalition for Housing (NYCH); and
- Council to Homeless Persons Australia (CHPA).

Both NYCH and WESNET have prepared their own submissions to the Green Paper. These are written from their particular expertise on the needs of young homeless people, and women and their children escaping domestic violence.

## **Introduction**

Homelessness Australia welcomes the opportunity to provide this submission to *Which Way Home?* the Federal Government's Green Paper on Homelessness. This process of review and reform of Australia's national homelessness response is timely and positive. We note that no previous Prime Minister has been prepared to make homelessness a public policy priority in this manner. We welcome Prime Minister Rudd's leadership, personal and commitment to addressing this issue.

This document, *Many Ways Home: A National Homelessness Strategy for Australia*, responds to the Green Paper by presenting and addressing key challenges for homelessness support agencies and people experiencing homelessness, in the framework of a proposed holistic national response to homelessness underpinned by a co-ordinated Whole-Of-Government policy approach.

## Summary of Recommendations

In response to the Green Paper, Homelessness Australia proposes a holistic national response to homelessness underpinned by a Whole-Of-Government policy approach that will enhance the Supported Accommodation Assistance Program (SAAP) and co-ordinate other Federal, State and Territory Government initiatives that impact on homelessness by:

### **Drawing together the program and funding arrangements necessary to address homelessness within the National Reform Agenda.**

- 1 *A 10 year increase in the supply of housing for people who have experienced homelessness.*
  - 1.1 Increase the supply of social housing to at least six per cent of total housing stock by 2010 and 10 per cent by 2020.
  - 1.2 Improve accessibility and affordability of private rentals for people with histories of homelessness including by setting targets through the National Rental Affordability Scheme and/or prioritising development applications that will allocate NRAS housing to people experiencing homelessness.
  - 1.3 Use the current review of the tax system to investigate and implement use of tax arrangements to increase affordable private rental supply

- 2 *Enhancing SAAP as the foundational homelessness response, to provide longer term support to clients.*

#### **Strengthening the SAAP foundation**

- 2.1 Increase funding for SAAP and SAAP CAP (Crisis Accommodation Program) to meet unmet demand.
- 2.2 Provide sufficient resources to support client needs.
- 2.3 Recognise and fund children as clients of SAAP in their own right.
- 2.4 Address workforce capacity and development issues in line with the recommendations of the independent evaluation of SAAP IV.

#### **Building on the SAAP foundation**

- 2.5 Create and fund a new stream of SAAP to provide longer-term support to clients to maintain tenancies, address social/personal challenges and participate in the social and economic life of their communities. The principles for the design of this new stream are:
  - Ensuring flexible delivery of case management for the length of time that a client needs support;
  - Providing sufficient funding to enable a multiple-disciplinary team approach;
  - A commitment to appropriate case loads that allow for intensive work with clients;
  - Provision of pay and conditions sufficient to attract case managers who have the skill set to undertake this work; and
  - Availability of dedicated brokerage funding.

## **Improved capital funding for SAAP to support these enhancements**

- 2.6 Ensure CAP funded buildings meet the needs of residents (safety, comfort, accessibility, privacy, appropriateness to the needs of families and individuals, and offering a sense of ownership) and of agencies (including office, storage, meeting and training space).

### *3 Expand early intervention and prevention strategies*

#### **Early intervention**

- 3.1 National expansion of the HOME Advice program; and
- 3.2 National expansion of the Reconnect program.

#### **Prevention**

- 3.3 Implement a Whole-Of-Government response to homelessness as outlined at Points 5 and 6.

### *4 Create a Homelessness Agreement to complement the National Affordable Housing Agreement, in recognition of the distinctiveness and complexity of the homelessness response.*

- 4.1 Include all relevant homelessness programs including SAAP, CAP, Reconnect, HOME Advice and the Jobs, Placement, Employment and Training Program in the Homelessness Agreement.

## **Develop a Whole-of-Government framework for policy coordination across portfolios and at different levels of Government**

### *5 Develop and implement a Commonwealth Whole-of-Government Homelessness Strategy to ensure all Commonwealth portfolios are consistently responsive to the needs of people experiencing and at risk of homelessness. Portfolios for special attention include:*

#### 5.1 Education, Employment and Workplace Relations

##### **Employment Services**

- Fund employment and pre-employment services equivalent to demand, ensure these programs are free of time-limited support periods, and have access to sufficient brokerage funding to remove barriers to stable housing;
- Centrelink and PAGES must more readily recognise social participation and pre-employment activities as 'participation activities for income support purposes;
- Resource homelessness support agencies to provide ongoing support to clients to sustain housing and encourage social and pre-employment activities as well as economic participation;
- Stream 4 of the new Employment Services system must work towards these goals as a priority; and
- JPET should be retained as a distinct program under FaHCSIA.

##### **Youth**

- Use the Australian Youth Forum to consult directly with young people on issues surrounding the implementation of the White Paper.

## 5.2 Families, Housing, Community Services and Indigenous Affairs

### **Homelessness caused by domestic violence**

- Progress the response to women and children's homelessness as a result of domestic violence through the National Plan to Reduce Violence against Women and Children;
- Implement the recommendations of the Partnerships against Domestic Violence program; and
- Review and amend family law reforms including the "50/50" presumption of shared care for children that compound the vulnerability of women and children experiencing domestic violence.

### **Aboriginal and Torres Strait Islander homelessness**

- Prioritise access to safe, secure, appropriate, affordable housing with support in a Federal plan to address the disadvantage of Aboriginal and Torres Strait Islander people, in line with the 2006 recommendations of the UN Special Rapporteur on the Right to Adequate Housing; and
- Provide ongoing Federal support to culturally appropriate homelessness crisis and tenancy support services.

## 5.3 Human Services

### **Income support**

- Expand and improve resourcing of Centrelink's prisoner servicing program;
- Amend job-search expectations for women escaping domestic violence so that they are consistent with other automatic exemptions;
- Increase the availability and amount of the Crisis Payment to reflect the extraordinary circumstances of people in receipt of this payment;
- Alter Centrelink processes and instruments to ensure they recognise primary, secondary and tertiary homelessness;
- Alter Centrelink administrative practices to provide better service to homeless clients including by increasing availability of weekly payments, and improving homelessness risk identification tools and processes;
- Ensure the new "day-by-day" breaching regime specifically takes into account experiences and risk of homelessness. The 'reasonable excuse' criteria should be amended to include types of homelessness.
- Remove financial disincentives to the disclosure of homelessness to Centrelink;
- Expand Centrelink's Community Service Teams nationally in recognition of their success in resolving income support issues for people experiencing homelessness; and
- Ensure income support recipients are not penalised for moving to an area of lower employment prospects in order to take up affordable housing.

#### 5.4 Health and Ageing

##### **Aged and homeless**

- Introduce a capital funding program for facilities providing a high proportion of residential places to elderly homeless; and
- Reform the recurrent funding instrument

#### 5.5 Immigration and Citizenship

##### **Migrant, refugee, asylum seeker and Non-English Speaking Background homelessness**

As strategies to reduce homelessness risk among these populations:

- Reverse 2001 tightening of eligibility of welfare for New Zealanders resident in Australia;
- Ensure access to social services for the category of visas that will replace TPV's and THV's;
- Reverse the two-year wait-time for eligibility for Special Benefit;
- Provide more support to recent migrants particularly those holding Temporary Protection Visas (TPVs) and Temporary Humanitarian Visas (THVs) including through a national roll-out of the Department of Immigration and Citizenship's (DIAC) Community Care case-work approach;
- Expand culturally appropriate domestic violence service delivery including funding for free-to-user translation services and dedicated bilingual workers in domestic violence services;
- Review of spouse visas and active dissemination of clear guidelines for the support of women experiencing domestic violence who hold temporary spouse or sponsored visas or an 'Assurance of Support' provided by a violent or neglectful partner or other sponsor.

#### 5.6 Planning and Co-ordination Mechanisms

Each Department involved in the Strategy should develop a plan to progress these issues, using a common definition of homelessness that recognises primary, secondary and tertiary homelessness.

### *6 Build on existing State/Territory homeless strategies*

6.1 Improve mainstream services' responses to homelessness using the Specific Purpose Payment arrangements;

6.2 Implement national standards to reverse systemic policy failures in institutional care; and

6.3 Ensure every State and Territory has a Homelessness Strategy in Place; that these strategies are consistent with each other and with the Commonwealth Whole-Of-Government Strategy.

**Set out a robust legislative and accountability framework that includes rights-based legislation, targets, a co-ordinating authority, a research agenda, and enhanced sector representation.**

*7 Create a Homelessness Act*

- 7.1 This legislation ensures an enforceable framework that protects peoples' rights to crisis and permanent accommodation and holds all agencies that are part of the National Homelessness Strategy to their responsibility to work actively to resolve homelessness.

*8 Set targets and develop a strong research agenda*

**Targets**

- 8.1 Federal, State and Territory homelessness plans should adopt a unified definition of homelessness that accords with Mackenzie and Chamberlain's definition of primary, secondary and tertiary homelessness;
- 8.2 Endorse the Australian Bureau of Statistics Census Night Count as a high-level indicator of success against the White Paper, along with performance measures that demonstrate the success of funding arrangements and policy measures;
- 8.3 Progress against the White Paper should be assessed in an annual report by the Minister to Parliament, prepared by the new Australian Council on Homelessness (see recommendation 10).

**Research**

- 8.4 Fund a national longitudinal study of pathways out of homelessness;
- 8.5 Establish a National Homelessness Research Association

*9 Resource strong national, State and Territory homeless peak bodies*

- 9.1 Support Homelessness Australia's role in implementing the White Paper through funding the establishment of new policy reference groups, additional policy and community education projects, and regular events to assess progress against the White Paper including biennial Homelessness Conferences and an annual White Paper roundtable;
- 9.2 Fund homelessness peak bodies in each state and territory to provide advice and support to State and Territory governments and to homelessness support agencies in the implementation and evaluation of the new approach; and
- 9.3 Grant all peak bodies Public Benevolent Institution (PBI) and Deductible Gift Recipient (DGR) status.

*10 Create a strong national lead agency*

- 10.1 Establish an Australian Council on Homelessness to oversee and coordinate the National Homelessness Strategy.

**Implement a partnership approach**

*11 Deliver community sector workforce development and simplified contractual arrangements.*

## **A New Approach to Homelessness: Responding to the Green Paper**

This submission sets out an alternative model for the White Paper on homelessness.

Homelessness Australia is concerned that the models proposed in the Green Paper will not achieve a substantial fall in the number of people experiencing homelessness in the next 10 years. There are risks to Options One and Three that limit their ability to adequately address homelessness. Option Two will need to be supported by a range of other initiatives.

The Green Paper presents three options:

- Option One: Transform SAAP so that it is focussed on distinct client streams;
- Option Two: Enhance SAAP; and
- Option Three: Improve the response of mainstream programs to homelessness and limit SAAP to responding to crisis interventions.

### **Risks to transforming SAAP: Options One and Three**

Options One and Three, which involve fundamental change to the operation of SAAP, have strengths but also risks.

Under Option One, responsibility for administering SAAP will sit with different Federal departments, and/or different State/Territory departments. This option does not address systematic issues with the program, including the lack of resources. It simply transfers the administrative functions of the program to different Departments. Funding for different parts of the program would be determined by different Departments.

It is doubtful this approach would necessarily link people experiencing homelessness with the range of services that they need. For example, if youth SAAP is transferred to education, young people who are homeless are still likely to need access to health, housing and family relationship services. SAAP providers funded under an education portfolio would still need to develop links with other types of services.

It is also difficult to see how this approach would work in an administratively simple manner under the new National Affordable Housing Agreement. If responsibility for SAAP services is given to multiple Departments, each portfolio may need to be a signatory to the new Agreement creating unnecessary bureaucratic complexity.

Option Three will require significant improvements in the ability of mainstream social services to support people who are homeless. Many mainstream social programs have lengthy waiting lists. Many are also currently unable to identify people who are homeless and are therefore unable to address the issue of waiting lists by targeting resources, for instance, by creating priority access criteria. Developing this capacity, while critical to the success of a new national response to homelessness, is likely to take considerable time. This is demonstrated by a recent NSW Government audit that found only two NSW Government departments are able to identify people who are homeless.

Option Three does not identify who will link the person experiencing homelessness to mainstream services. As the Green Paper notes, support services for people experiencing homelessness tends to be tied to their crisis accommodation. If SAAP's capacity to work with clients is not enhanced, it is difficult to see who will be able to link the person or family experiencing homelessness with mainstream services.



## **Building on a foundation: Option Two**

Option Two proposes a much-needed increase in funding and enhancement of the SAAP response. SAAP is a successful program, with a proven capacity to generate positive outcomes for clients despite scant material resources.

The Green Paper overlooks recent data that highlights the program's positive impact on client well-being. For example, research commissioned by the National Co-ordination and Development Committee paints a very positive picture of the extent of client movement towards self-reliance after receiving SAAP support. More than two-thirds of those surveyed felt that they had travelled more than half-way to "getting back on their feet". More than a third felt they had almost achieved this goal. The research highlighted the range of support people are provided to address barriers to self-reliance. This includes support to access accommodation, manage interpersonal conflict, address chemical addiction, and cope with stress, depression and other health issues.<sup>1</sup>

However, no national data is collected under the auspices of SAAP to assess the system's long-term impact on client outcomes. The last independent SAAP evaluation noted that it was "not able to locate any systematically collected data about the important aspects of behavioural change that may follow a period of SAAP support, nor of any data that reflects on the extent to which health, social or affective functioning may have been impacted".<sup>2</sup> This suggests that data collection about long-term client outcomes in the homelessness support system is an area for improvement in a new national approach to homelessness.<sup>3</sup>

While welcome recognition of the role of SAAP, Option Two, like Options One and Three, fails to address the broader context in which the national response to homelessness sits. It does not acknowledge the significant barriers to accessing basic mainstream services (health, education, employment support and so on) that people with an experience of homelessness face. These barriers include waiting lists, travel expenses, lack of available services, administrative restrictions, out-of-pocket expenses<sup>4</sup> and discrimination. Option Two also fails to canvass options for prevention and early intervention, including how best to involve other areas of Government policy in the response to homelessness. None of the Options acknowledge the need for a significant increase in the supply of affordable, permanent, safe, appropriate housing.

Therefore, this submission proposes a model that both enhances SAAP and coordinates other Government initiatives to create a framework for a holistic national response to homelessness. This model has 11 elements.

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<sup>1</sup> Eardley, T 2008, 'Measuring the Impact on Client Self-Reliance', *Parity*, vol.21 (4), p.10-11

<sup>2</sup> Erebus Consulting Partners 2004, *National Evaluation of SAAP IV – Final Report* p.74

<sup>3</sup> This issue is discussed in more detail under Point 7 of this submission.

<sup>4</sup> Homelessness Australia member survey April 2008, unpublished.

These elements:

- Draw together the program and funding arrangements necessary to address homelessness in the context of the National Reform Agenda;
- Provide a framework for policy coordination across portfolios and at different levels of Government;
- Set out a robust accountability framework that includes targets, a co-ordinating authority, a research agenda on homelessness and enhanced sector representation through stronger National and State/Territory peak bodies; and
- Establish a partnership approach shared by Government and the community sector.

The 11 elements of this model are:

*Program and funding arrangements*

- 1 A ten year increase in supply of housing for people who have experienced homelessness;
- 2 Enhance SAAP to enable the program to provide longer-term support to clients;
- 3 Expand early intervention and prevention strategies; and
- 4 Create a specific Homelessness Agreement to complement the National Affordable Housing Agreement.

*Whole-of-Government policy framework*

- 5 Implement a Commonwealth Whole-of-Government Homelessness Strategy; and
- 6 Build on existing State and Territory homeless strategies.

*Legislative and Accountability framework*

- 7 Create a Homelessness Act;
- 8 Set targets and develop a strong research agenda;
- 9 Resource strong national, State and Territory homelessness peak bodies; and
- 10 Create a strong national lead agency.

*A partnership approach*

- 11 Deliver community sector workforce development and simplified contractual arrangement.

These eleven elements make up a National Homelessness Strategy that will be the basis for a whole-of-community response to homelessness.

## Program and Funding arrangements in the context of National Reform Agenda

- 1 A ten year increase in funding for housing for people who have experienced homelessness

To achieve a substantial fall in the number of people who are homeless over the next 10 years, there will need to be a substantial increase in housing for people who have been homeless. This issue is canvassed in the Green Paper but no proposals are made about how to achieve this within the three options presented.

Stable, affordable, appropriate housing enables people to access employment, education and training and other support services. It provides a basis from which to build social networks, re-establish links with family (where appropriate) and participate in community life. Without access to housing, it is unsurprising that many people who have experienced homelessness do not achieve the kinds of positive long-term outcomes described in the Green Paper.

For a new approach to homelessness to succeed, Government must increase the supply of public and community housing, as well as improving access to affordable private rental housing.

### *Social housing*

Funding for social housing (i.e. public and community housing) has fallen by 17per cent in real terms between 1997-98 and 2006-07 (Productivity Commission 2008, *Report on Government Services 2008*, p.16.6). For people experiencing homelessness, this has meant that access to social housing is extremely limited.

All jurisdictions include homelessness, using one definition or another, among the priority access criteria for public housing (see Attachment 1). For example, in NSW, homelessness is one factor in determining if someone is in unstable housing<sup>5</sup>. In Victoria, tenants can apply for early housing if they have a history of being homeless or are at risk of long-term homelessness.<sup>6</sup> In South Australia, a definition of homelessness similar to the SAAP Act definition is used when assessing if someone is eligible for category 1 housing.<sup>7</sup>

However, even in an environment of segmented waiting lists, where homelessness should represent the highest level of need, many people with priority access still wait an extended period of time to access a property. Only 22 per cent of people with priority access are housed in less than three months. Half of those with priority access will wait more than a year.<sup>8</sup>

The Minister for Housing has observed that the previous Federal Government had withdrawn \$3 billion in funding from the Commonwealth State Housing Agreement.<sup>9</sup> A 10 year plan to address homelessness must set out a 10 year commitment to reverse Government under-investment in social housing.

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<sup>5</sup> Housing NSW, 'Priority Housing Fact Sheet', [www.housing.nsw.gov.au](http://www.housing.nsw.gov.au)

<sup>6</sup> Office of Housing, Victoria, 'Recurring Homelessness: applying for early housing', [www.housing.vic.gov.au](http://www.housing.vic.gov.au)

<sup>7</sup> Department for Families and Communities, South Australia, 'Housing Needs Report Form', [www.familiesandcommunities.sa.gov.au](http://www.familiesandcommunities.sa.gov.au)

<sup>8</sup> AIHW, public housing data set.

<sup>9</sup> SBS TV, *Insight*, 'Out of Reach', 25 March 2008

To achieve this, significant new funding needs to be invested in the new National Affordable Housing Agreement. The immediate aim should be to increase the supply of social housing to at least six per cent of total housing stock by 2010. By 2020, the total stock of social housing needs to be increased to 10 per cent of national housing stock.<sup>10</sup>

#### *Private Rental*

As part of the new approach to homelessness, the Federal Government must clearly identify strategies to increase access to private rental homes for people who have been homeless. Homelessness Australia welcomes the announcement of the National Rental Affordability Scheme (NRAS), which will initially provide 50,000 properties at 20 per cent below market rent. Currently, the scheme's eligibility criteria focus on low income households experiencing rental stress. While this is welcome, it will not necessarily assist families or individuals who have experienced or who are at significant immediate risk of homelessness to obtain private rental housing. In order to address this issue, a proportion of NRAS properties should be made available to people who have been homeless. This could be done by giving preference to development applications that indicate a proportion of properties will be made available to people experiencing homelessness. This re-orientation of NRAS will help to provide a range of appropriate, affordable housing options – social and private – to people exiting homelessness.

In addition to changes to the NRAS, Homelessness Australia recommends further exploration of tax reforms to encourage construction of new low-cost rental housing. The current review of the tax system should investigate and implement use of tax arrangements to increase affordable private rental supply.

While an increase in housing will be crucial to the success of the new approach, many people who have experienced homelessness will need to access support both while homeless, and to maintain their tenancies after securing housing. These two aims can be achieved by enhancing SAAP.

- 2 Enhance SAAP as the foundational homelessness response, to enable it to provide longer-term support to clients.

Of the options presented in the Green Paper, enhancing SAAP is the most effective way of achieving longer term outcomes for people experiencing homelessness.

As the Green Paper notes, SAAP is where people experiencing homelessness are most likely to be linked effectively to mainstream services and programs.<sup>11</sup> This point is reflected in many of the examples of innovation and good practice cited in the Green Paper.

This is not to suggest that the response of mainstream services should not be improved over time. Indeed, this is a priority and can be best achieved by improving and nationally co-ordinating existing State/Territory homelessness strategies. This is discussed under point 6 below.

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<sup>10</sup> Senate Select Committee on Housing Affordability in Australia 2008, *A good house is hard to find: housing affordability in Australia*, p.52

<sup>11</sup> Australian Government 2008, *Which Way Home?*, p.33

However, the homelessness sector through the foundational program SAAP is the most experienced, responsive, knowledgeable and creative provider of services to people experiencing homelessness and must therefore remain the centre of an improved national homelessness response. There are two enhancements that need to be made to the program: improvements to the current SAAP response, and the creation of a new stream of funding to enable the program to provide long term support. These enhancements need to be supported by additional capital funding under the Crisis Accommodation Program (CAP).

#### *Strengthening the SAAP foundation*

If SAAP is to be repositioned to provide longer term support to clients, a range of issues related to the program's current design will need to be addressed. These issues are:

- Addressing ongoing unmet demand;
- Providing sufficient resources to support client needs;
- Funding children as clients of SAAP in their own right; and
- Addressing workforce capacity and development.

The level of unmet demand for SAAP support and accommodation is very high. To build SAAP's capacity to provide longer-term support to people who have experienced, are experiencing or are at risk of homeless, we must ensure that people will be able to access the program. Additional funding for SAAP must be supported by increased capital funding to enable the program to provide accommodation for those clients who need it. In this regard, the recent announcement of \$150m for extra crisis accommodation is a welcome first step that must be supported by a larger scale investment.

In the last five years, turn-away rates from SAAP agencies have consistently been 50 per cent to 55 per cent for clients, i.e. adults and children not accompanied by a parent or guardian. Children accompanied by a parent or guardian are not recognised as SAAP clients. Turn-away rates for this group are even higher. Since data has been collected in 2002-2003, more than three in five accompanied children have been turned away from SAAP services each day.<sup>12</sup>

To work more intensively with clients, in accordance with their needs and to sustain their exit from homelessness, SAAP requires additional resources. Since 1996, funding has increased in real terms at about two per cent a year, but this has not been sufficient to meet increasing levels of demand. Funding per client in real terms has fallen, from \$3,180 in 1996-97 to \$3,130 in 2005-06.<sup>13</sup> Additional funding will enable agencies to identify and develop new ways of working with clients. On average, agencies receive only around \$250,000.<sup>14</sup> This constrains the range of service models they can provide. We should therefore not be surprised that agencies are unable to provide, at this level of funding, some of the types of innovative interventions that the Green Paper identifies as not currently provided within SAAP.<sup>15</sup>

To enable SAAP to fulfil its goal of supporting people to resolve homelessness, accompanied children must be recognised and funded as users of services in their own right. In 2005-06, 54,700 accompanied children used SAAP, out of

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<sup>12</sup> AIHW, *Demand for SAAP accommodation by homeless people*, various years

<sup>13</sup> AIHW 2007 *Homeless People in SAAP: SAAP National Data Collection annual report 2005-06* p.88

<sup>14</sup> AIHW 2007 p.11

<sup>15</sup> Australian Government 2008, *Which Way Home?* p.30

106,500 clients.<sup>16</sup> Since they are not recognised or funded as clients, services for children experiencing homelessness cannot be funded, monitored or assessed nationally in a planned and co-ordinated way. Specific and planned responses for children who are homeless are not only necessary to meet their immediate needs for shelter and care. They are also essential for children's development and to decrease their vulnerability to homelessness later in life.

Additional resources are also urgently needed to address workforce capacity and development issues. As the Green Paper notes, "funding constraints have limited the ability of organisations to offer employment packages necessary to attract and retain specialist staff to provide quality services for clients with complex needs". The most recent independent national evaluation of SAAP found that increases in the real cost of service delivery, largely driven by award based supplementation, required funding increases that were double those provided under the SAAP III and SAAP IV Agreements.<sup>17</sup>

These recommendations reflect the findings of the SAAP IV evaluation. In line with this evaluation, Homelessness Australia recommends a 40 per cent increase in funding to reflect the true cost of service delivery.

*Building on the SAAP foundation: A new SAAP stream for longer support*

Homelessness Australia recommends that an additional stream of funding be made available within SAAP to enable services to work with clients over a longer period to support them to make successful and sustainable transitions out of homelessness. Similar funding arrangements for long term support exist in other programs, for instance the Personal Helpers and Mentors Program managed by FaHCSIA.

A range of post-crisis support models are in use in the homelessness sector, and could be provided within this new SAAP stream. To be successful, key features of this program must include:

- Flexible delivery of case management for the length of time that a client needs support.

A key concern expressed at the Green Paper Roundtable is that the time limits imposed on client support periods in current program structures are counterproductive.<sup>18</sup> Time limits reduce the effectiveness of support to clients and decrease the likelihood of sustainable resolution of homelessness. Homelessness Australia welcomes the acknowledgement of this issue in the Green Paper.

- Sufficient funding to enable a multiple-disciplinary team approach.

The effectiveness of multidisciplinary team approaches has also emerged clearly in consultation with the homelessness support sector, for instance at the Green Paper Roundtable. The ability to use staff with differing professional expertise (alcohol and other drug workers, social workers) working as part of a team to address an individual's needs is an especially valuable part of building a long-term approach.<sup>19</sup>

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<sup>16</sup> AIHW 2007, p.2

<sup>17</sup> Erebus Consulting Partners 2004, p.176

<sup>18</sup> Homelessness Australia 2008, Report from Green Paper Roundtable

<sup>19</sup> For example, see the Women Housing and Complex Needs project Final Report prepared by Hanover and Sacred Heart Mission

- A commitment to appropriate case loads that allow for intensive work with clients.

Case loads must remain manageable and reasonable so that services are able to provide the necessary intensity of client support.

The experience in existing programs designed to provide long term support is that case loads have been too high to enable effective work with clients. A case in point is the Personal Support Program (PSP), which provides case management for up to two years to income support recipients who have personal and social barriers that prevent them from seeking employment. PSP case loads can range between 40 to 75 individuals per FTE case manager. This makes it difficult for case managers to spend sufficient time with clients.<sup>20</sup>

- Pay and conditions sufficient to attract case managers who have the skill set to undertake this work

The success of this new program stream will depend on the ability of agencies to attract and retain a workforce with the skills and experience to undertake this type of work. Experience in similar existing programs is that salaries are insufficient. A 2005 survey found that the average salary for a PSP case worker was \$41,000.<sup>21</sup>

- Dedicated brokerage funding from mainstream programs

Dedicated brokerage funding will be essential to the success of this necessary new funding stream. Brokerage can be used to purchase services that may be needed by clients as part of their case management plan. These services could include, for example, drug and alcohol counselling, psychological and psychiatric services and employment and training. It is worth noting that these types of services are often needed by SAAP clients, but services are not able to provide them from the pool of funding they receive.

For this reason, brokerage funding must be made available from the budgets of mainstream programs. States and Territories could be required to make a proportion of funding from mainstream programs available to SAAP agencies through the reform of Specific-Purpose Payments (SPPs).

The lack of dedicated brokerage funding severely constrains the ability of SAAP services to work with their clients. The PSP program has no dedicated brokerage funding. Therefore services must make brokerage available from within their general budget. The Brotherhood of St Laurence has found that PSP services can spend a maximum of just \$150 per year per client on services for within program funding. This is insufficient to address the broad range of barriers that these individuals have.<sup>22</sup> On average PSP clients have 8.5 social barriers to employment, most commonly family breakdown, low self-esteem and lack of social networks.<sup>23</sup>

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<sup>20</sup> Perkins, D 2007, *Making It Work: Promoting Participation of job seekers with multiple barriers through the Personal Support Program*, Brotherhood of St Laurence, p.86

<sup>21</sup> Jobs Australia 2005, *Employment Services Sector: Remuneration Survey – Report 2005*, p.53

<sup>22</sup> Homelessness Australia notes that this situation has been partly addressed through the reform of the Employment Services system.

<sup>23</sup> Perkins, D 2007, pp.32, 86

### *Supporting enhancements to SAAP through additional capital funding*

An increase in capital funding is necessary to support enhancements to SAAP. Capital funding is an essential component of homelessness service delivery. Services must be able to provide affordable, appropriate, well maintained, comfortable properties that provide clients with a safe and positive living environment. Properties should:

Include office workspaces, reception areas and staff facilities including meeting rooms;

- Provide privacy for residents (for instance independent units for single people, appropriate private homes for families), a sense of independence and control of their living space;
- Be properly fit out in accordance with universal design principles ensuring disability access and safety; and
- Have areas for storage, recreation, and other activities such as training.<sup>24</sup>

Capital funding is currently provided for the construction, renovation and purchase of crisis accommodation for use by SAAP agencies. However the increase in CAP funding has not been sufficient to meet the diverse requirements of services as outlined above. Funding provided under the Commonwealth State Housing Agreement (CSHA) for CAP has only increased by 2.5 per cent over the last ten years (about 0.2 per cent per year).<sup>25</sup> By comparison, maintenance costs for all properties funded under the CSHA increased by eight per cent between 2001-02 and 2005-06.<sup>26</sup> Over the same period, the cost of materials used in house construction has been increasing above the rate of inflation (at three per cent – 3.5 per cent a year).<sup>27</sup> The need for increased investment in this area is clear.

### 3 Expand early intervention and prevention strategies

Federal programs targeted at early intervention should be greatly expanded.

#### *Early intervention*

The successful Household Organisational Management Expenses (HOME) Advice program should be expanded nationally. HOME Advice is an early intervention program for families at risk of homelessness. It currently only operates from eight sites around the country. Participating families generally experience financial problems, including accumulating debt, combined with low family income and high housing costs.<sup>28</sup> An evaluation in 2007 showed that the program is highly effective. Eighty-six per cent of families remained in adequate housing or improved their housing situation.<sup>29</sup> This outcome was achieved

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<sup>24</sup> Clay, N 2008, 'Its Time, Its Over Due and It Can Be Fixed', speech to *New Horizons: Practice, Research and Emerging Issues*, 5<sup>th</sup> National Homelessness Conference

<sup>25</sup> FaHCSIA various years, *Housing Assistance Act 1996: Annual report*

<sup>26</sup> FaHCSIA 2007, *Housing Assistance Act 1996: Annual report 2005-06*, p.15

<sup>27</sup> ABS cat no 6427.0

<sup>28</sup> MacKenzie, D, Desmond, K and Steen, A 2007, *Household Organisational Management Expenses (HOME) Advice Program Evaluation Report*, Department of Families, Community Services and Indigenous Affairs, p.10

<sup>29</sup> *ibid*, p.xvi



through a holistic case management approach that addressed families' full range of needs and was not confined to financial management issues. Nearly two-thirds (61 per cent) of families had experienced family violence. A significant minority had experienced mental illness (32 per cent) or chemical addiction (24 per cent).<sup>30</sup> HOME Advice is a model of 'joined-up' service that stabilises housing while supporting people to overcome other forms of disadvantage.

A second successful existing program, Reconnect, should also be substantially expanded. Reconnect is the major Federal program for young people at risk of homelessness. The program works with young people to address family conflict and support engagement with work, education and training.

The number of young people potentially eligible for the program is three times the number that can receive its assistance at current funding levels. An estimated 15,000 or one per cent of Australia's school children are at risk at homelessness. Reconnect currently only assists 5,500 to 6,000 students a year.<sup>31</sup>

### *Prevention*

Prevention can be best enhanced through an improved whole-of-government homelessness policy framework that addresses the social drivers of homelessness and responds to failures in non-homelessness specific policy areas that contribute to homelessness. These issues are discussed in detail under Points Five and Six of this submission.

#### 4 Create a Homelessness Agreement to complement the National Affordable Housing Agreement

Homelessness Australia recommends the creation of a specific Homelessness Agreement to complement and expand the scope of the National Affordable Housing Agreement. The Homelessness Agreement should include all key funding relevant to the national response to homelessness. This does not mean that all programs included in the agreement should be administered by States and Territories as Specific Purpose Payments. Homelessness Australia understands Federal Government programs, such as Commonwealth Rent Assistance, will be included in the Agreement as it is currently envisaged and will continue to be administered at a Federal level.

Relevant programs that should be included in the Homelessness Agreement include:

- SAAP;
- CAP;
- Reconnect;
- HOME Advice; and
- JPET, which should be retained as a distinctive program.

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<sup>30</sup> *ibid*, p.11

<sup>31</sup> Chamberlain and MacKenzie 2004, *Youth Homelessness: Four Policy Proposals*, AHURI Final Report no. 69, pp.42-43

The creation of this agreement will recognise the connections between homelessness and affordable housing policy and administration, but also the unique nature of the homelessness response. This response includes crisis accommodation, various types of housing (transitional, permanent, public, community and private) and social support as appropriate to the needs of individuals and families. Because homelessness is much more than "rooflessness", the homelessness response demands a unique and distinct administrative and funding framework.

It is essential in the process to develop the Homelessness Agreement to have tight targets in place between the Commonwealth and the State/Territory Governments. This will ensure that funding and programs for homelessness are directed and maintained in the area and not able to be diverted into other priorities.

Under the Homelessness Agreement, SAAP must be retained as a single, distinctive and expanded program with a stronger and appropriately resourced focus on achieving long-term client outcomes.

Capital funding provided under the Crisis Accommodation Program (CAP) must continue to be tied to SAAP. As noted, funding for capital needs to be greatly expanded to respond appropriately to the level of need for homelessness services.

To emphasise the relationship between exits from SAAP into housing, the expanded Agreement must set achievable targets for numbers of people with experiences of homelessness entering and maintaining tenancies. Distinct targets should be set for the proportion of SAAP clients who exit into housing, and the proportion who successfully maintain their tenancy over time.

Currently, about one-third of SAAP clients who request support to obtain or maintain housing exit into private rental, while one in five exits into public or community housing.<sup>32</sup> More than half (55 per cent) of clients who exit into independent housing return to SAAP within six months.<sup>33</sup> This situation could be reversed if homelessness support agencies, through a new SAAP stream, are resourced to support clients more effectively post-homelessness.

Another benefit of including all homelessness programs in the one agreement is that it will simplify service modelling and development. For example, it will be easier to address challenges relating to rural and regional service delivery experienced across all of these programs. Current program modelling does not take into account the long distances covered by workers providing these services in rural and regional areas. Often an entire day (or more) can be taken up travelling to provide support to a single client. This is a challenge that will only be exacerbated by rising petrol costs. Simpler and more coherent program administration through a Homelessness Agreement will assist Government and providers to discuss and address issues of this kind in a holistic manner.

Develop a Whole-of-Government framework for policy co-ordination across portfolios and at different levels of Government

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<sup>32</sup> AIHW 2007, p.75

<sup>33</sup> Productivity Commission 2008, *Report on Government Services 2008*, Table 15A.199

- 5 Develop and implement a Commonwealth whole-of-government homelessness strategy to ensure all portfolios are consistently responsive to the needs of people experiencing or at risk of homelessness.

The funding arrangements supported through a Homelessness Agreement must be accompanied by a holistic policy framework that coordinates the different areas of Commonwealth, State and Territory responsibility that impact on homelessness.

At the Commonwealth level, a number of policy areas should be linked through the national homelessness response. While most Commonwealth Departments will have some degree of involvement in a truly holistic national response, the primary portfolios include:

### ***Education, Employment and Workplace Relations***

#### *Employment Services*

The employment services system must be redesigned to better overcome the employment and pre-employment barriers that many people experiencing homelessness face. While employment is the ultimate goal, many people who have experienced homelessness must first address a range of other issues before they are in a position to look for, or maintain, employment. In this context, supporting people to access and maintain stable housing must be a priority of an employment services system.

Employment and pre-employment services for the homeless must be funded at a level equivalent to need, and be free of quotas, capped places and time limited support. Brokerage funding must be sufficient to remove barriers to stable housing. Funding must flow to the most disadvantaged. Ongoing support must be made available to help sustain people in housing and employment. We acknowledge that the new Employment Services system has been designed with these principles in mind.

#### *Encouraging economic and social participation through employment services*

Like the general population, the vast majority of people who experience unemployment while they are homeless aspire to work. However in light of often complex personal and social barriers to work, employment services must recognise the validity of multiple forms of participation and support a range of activities that improve a person's ability to engage in sustainable employment. Activities such as financial or relationship counselling, accessing health services including rehabilitation and mental health services, and undertaking education and training are all examples of activities that must be fully supported in an employment services system that hopes to end homelessness.

Activities that encourage self-worth, self-awareness, community connections and social involvement should also be recognised as possible precursors to job-search activities for many individuals with experiences of homelessness. Activities of this kind include participation in sporting or creative recreational activities and volunteering. Short-term group training in life skills and short-term vocational exposure training should be encouraged. These activities, whether provided by SAAP services or other community agencies, should be recognised by Centrelink and employment services providers as 'participation activities' for income support purposes. The administrative processes by which they are assessed as appropriate activities should be simplified and streamlined.

Specialist pre-employment programs such as the Personal Support Program (PSP) and the Job Placement, Employment and Training (JPET) program are an integral

part of the homelessness response. These programs provide essential employment and pre-employment support to clients whose needs cannot be met effectively by mainstream employment services.

Fifty per cent of PSP participants experience homelessness within the five years before joining the program. An average PSP participant faces 8.5 barriers to employment including family and relationship breakdown, mood disorders, anxiety conditions, chemical addiction, financial management difficulties, long-term unemployment and lack of access to transport. Seventy-eight per cent of participants suffered from mental illness<sup>34</sup>.

#### *The new Employment Services system*

Stream Four of the proposed new Employment Services system should be specifically tailored and resourced to tackle these barriers. Its performance monitoring should be based upon an individual's progress towards these goals, rather than attainment of casual, short-term but potentially unsustainable employment. The focus of Stream Four must be on social as well as economic participation, with the ultimate goal of supporting people to obtain meaningful work (that is, paid at a living wage, reliable and appropriate to a person's capacity). Homelessness Australia recommends that the current features of PSP that allow a focus on these barriers be retained and built upon in Stream Four.

There must be policy agreement between the new Employment Services strategy and the White Paper of Homelessness.

While large community sector organisations are able to achieve cost-effective scale in the provision services of these kind, small agencies including those in rural and regional areas are skilled in providing services in ways that respond effectively to local conditions. Quality of service to the most disadvantaged must be the primary consideration for Government when assessing tenders to provide service under Stream Four of the new Employment Services system. Small agencies who do not tender for this large contract should nonetheless be able to play a role in this specialist area.

#### *Future of JPET*

JPET focuses specifically on the needs of young homeless people, for whom education, counselling, vocational training and accommodation may be more pressing and significant issues than seeking employment. JPET should be retained in the new Employment Services system as a specific program. The ability of small non-profit youth services providers to continue to offer this specialist and holistic program to young people should be assured. Given its focus on homelessness, JPET should be reallocated to the Federal Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA). The program should be included as part of the suite of homeless programs under an expanded NAHA.

#### *Youth Affairs*

The Australian Youth Forum should be used as an opportunity to discuss issues relevant to youth homelessness. These might include experiences accessing Centrelink payments, barriers to housing and education. It could be done in a systematic way using surveys and other consultation mechanisms to gain feedback from young people about the approach followed in the White Paper.

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<sup>34</sup> Perkins, D 2007, p.28

## ***Families, Housing, Community Services and Indigenous Affairs***

### *Homelessness caused by domestic violence*

Domestic violence is one of the, if not the single, largest factor causing homelessness. A new approach to homelessness needs to significantly enhance prevention strategies, and improve the response to homelessness amongst women and children who have experienced domestic violence.

This work could be taken up through the Federal Government's National Plan to Reduce Violence Against Women and Children. Reducing homelessness caused by domestic violence should be a priority of the plan, and recommendations under the plan could draw on work developed under the previous Partnerships Against Domestic Violence (PADV). This includes implementing recommendations made in the PADV report *Home Safe Home*.

The National Plan should also consider the impact of family law reform, which has emerged as an issue since the work done by PADV. Homelessness support services report that family law reforms, in particular the "50/50 assumption" of shared care arrangements, have negatively affected the ability of women and children who have been homeless to make a successful transition to independence. These changes have further compounded the financial difficulties and vulnerability to poverty of many single parents. Single mothers and especially those who have been subjected to domestic violence are particularly affected. These changes also potentially prolong the vulnerability of women and children to domestic violence.<sup>35</sup>

### *Addressing Indigenous homelessness*

Aboriginal and Torres Strait Islander people are dramatically over-represented among those experiencing homelessness. While comprising about two per cent of the Australian population, they represent one out of every 11 people who are homeless on any given night.

Access to safe, secure, appropriate, affordable housing with support should be a priority in a co-ordinated, Federal plan to address Indigenous disadvantage, in line with the 2006 recommendations of the UN Special Rapporteur on the Right to Adequate Housing. There must be articulated links and policy agreement between this plan and the National Homelessness strategy. Specific targets for Indigenous housing could be included in the new NAHA, or agreed jointly by State/Federal governments for instance through the review of the Northern Territory Emergency Response.

Homelessness Australia also recommends a specific ongoing commitment to funding culturally appropriate homelessness support services that are resourced to provide crisis and permanent appropriate, affordable accommodation as part of a holistic community development model. This includes a specific commitment to addressing domestic and family violence.

Agencies providing these services should be supported to share their local learning and experience at the regional and national level in order disseminate best practice and assess progress. This is of particular importance for rural and remote services. In part this could occur through the Homelessness Australia forums proposed at Point 8.

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<sup>35</sup> Oberin, J 2008 'From Sydney Squat to Complex Services Challenging Domestic and Family Violence: Taking Stock', *Parity*, vol 21, issue 4, pp.24-25

## ***Human Services***

### *Improving income support*

Significant improvements can be made to income support arrangements for people experiencing homelessness.

Centrelink's Homelessness Strategy could be usefully expanded to address the full range of areas where income support impacts on people experiencing homelessness. For instance Centrelink's prisoner servicing program for people leaving incarceration could be expanded and receive greater resources. Changes should be made to job-search exemptions for women escaping domestic violence, so that these are consistent with other automatic exemptions. The Crisis Payment must be increased to a level that reflects the extraordinary circumstances of people in receipt of this payment.<sup>36</sup>

There are a number of administrative changes that would enhance the provision of income support to people experiencing homelessness. These include:

- Primary, secondary and tertiary homelessness should be recognised in Centrelink's operations, instruments and definitions;
- Further changes should be made to the administration of Centrelink payments to recognise issues for people experiencing homelessness, including making weekly payments more widely available, and further exploring options for communication other than by post (primarily personal communication);
- Centrelink must continue to further investigate and address flawed tools and processes for identifying homelessness including through the Job Seeker Classification Instrument and Job Capacity Assessment process.<sup>37</sup> Homelessness Australia supports the development of a specific 'homelessness risk identification' tool;
- In relation to the recently announced changes to the compliance regulations, Homelessness Australia recommends the new "day-by-day" breaching regime specifically take into account people's experiences of homelessness and that breaches not be applied where there is an experience of homelessness. Breaching decisions should also take into account other barriers to participation such as lack of transport, mental health etc;
- Financial disincentives to the disclosure of homelessness must be removed in order to assist Centrelink to provide an appropriate level of assistance and support to people experiencing homelessness. Rent assistance or other payments should not be removed from someone because they have become homeless;
- Centrelink's Community Service Teams, that conduct outreach to work with people experiencing homelessness, should be expanded nationally in recognition of their success in resolving income support issues for people experiencing homelessness; and
- People should not be penalised for moving to an area of lower employment prospects in order to take up affordable housing.

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<sup>36</sup> Public Interest Advocacy Centre 2008, 'Nothing More than Chicken Feed'. Homelessness Australia supports the full recommendations of this paper.

<sup>37</sup> Homelessness Australia welcomes the current reviews of these instruments.

## ***Health and Ageing***

### *Aged and homeless*

According to Census data, six per cent of people who are homeless are over 65, while two per cent of SAAP clients are over 65. It is important to note in this context that many people experiencing homelessness, particularly long-term and primary homelessness, are subject to premature ageing: that is, their health and consequent care needs fit a profile that is chronologically older than their actual age. The Census figures are therefore likely to under-estimate unmet demand for aged care-style services among the homeless population.

A new approach to homelessness needs to set out how it will support the aged and homeless to access aged care. SAAP has not been an appropriate response mechanism to meet the needs of the elderly. SAAP services and their workers are not trained in aged care and do not have staffing or equipment to provide appropriate services to the frail aged.

There are two major issues that need to be addressed.

- Capital funding

Policy settings around the capital funding of residential aged care facilities are based on a user-pays system, with residents expected to pay an Accommodation Bond (which can vary up to \$500,000+ per resident) which is in part refunded when the resident leaves the facility.

If a provider caters for homeless people, its capacity to raise capital from Accommodation Bonds is minimal. The Government should introduce a Capital Funding program which would contain a highly targeted funding pool to be made available to facilities which undertake to provide in excess of 90per cent of residential places to the elderly homeless, or those at risk of becoming homeless.

- Reform the recurrent funding instrument

The recurrent funding instrument, both in its current and previous guise, is a complex tool that takes little account of the lifestyle and consequent behaviours of older homeless people. It needs to be reformed so that it does not act as a disincentive to work with frail homeless people.

## ***Immigration and Citizenship***

### *Reducing vulnerability of migrants, refugees, asylum seekers and people from non-English speaking backgrounds*

People from a non-English speaking background comprise one in 10 of those who use homelessness services. Tertiary homelessness, particularly in the forms of overcrowded, insecure or impermanent accommodation is more common among refugee and asylum-seeker communities and for those on 3-year temporary protection visas, than for the general population.

Vulnerability to homelessness for individuals in these groups is often caused or compounded by their status under current immigration law. Ensuring immigration, protection and settlement policies administered by DIAC are in line with and support the goals, vision and outcomes of the national homelessness strategy must be a priority.

Specific issues for consideration include:

- New Zealand citizens

Since February 2001, New Zealand citizens living in Australia require Permanent Residence status to receive social security benefits. As New Zealanders do not need this to live, work and pay taxes in Australia, most do not apply. According to the Welfare Rights Network, as a result "increasing numbers of New Zealanders who have been living and working in Australia for many years are denied income support in the event of dramatic changes in circumstances such as accident, illness, unemployment or domestic violence." Anecdotal evidence gathered from community legal agencies suggests that increasing numbers of New Zealanders have experienced homelessness and have been forced to seek support in shelters as a result.

Homelessness Australia recommends a review of this situation and reversal of the 2001 tightening of eligibility for social security benefits.

- Temporary Protection Visas (TPVs) and Temporary Humanitarian Visas (THVs)

Holders of TPV and THV visas have had limited access to income and employment support, and are placed at significant risk of homelessness or inadequate housing as a result. The form of visa(s) that replace these must ensure appropriate access to social services.

- Reducing homelessness risks among recent migrants, refugees and asylum seekers

The two-year wait time for eligibility for Special Benefit should be reviewed. This extended wait time enhances the vulnerability of recently arrived migrants to homelessness by excluding them from access to employment and social support.

In light of this, Homelessness Australia recommends more intensive support to recent migrants particularly those on TPVs and THVs as a strategy to prevent homelessness. This could be supported through a national roll-out of DIAC's Community Care case-work approach, designed to ensure clients struggling to access housing and essential services are supported to meet these needs while their immigration status is determined.

Ongoing support to SAAP and migrant services to continue to address housing and social support is essential to success in this aspect of the national homelessness response.

- Supporting migrant, asylum seeker and non-English speaking background women

In addition to the practical challenges faced by migrants there are specific issues around the vulnerability of female migrants from non-English speaking backgrounds to homelessness and/or unsafe inappropriate housing.

Women from non-English speaking backgrounds who experience domestic violence face particular barriers to accessing support. These can include the



cultural appropriateness of services, language barriers, their insecure visa status - particularly for those on temporary two year spousal visas and a lack awareness of services and available support mechanisms.

To promote access to homeless services, Homelessness Australia recommends that interpreter services are made available free of charge, rather than on a fee for service basis. As a longer term goal, Homelessness Australia recommends continued commitment to, and expansion of, culturally appropriate domestic violence service delivery. This should include funding for dedicated bilingual workers in domestic violence services and the provision of regional and national networking and learning opportunities for workers and services in this area. This could occur through Homelessness Australia's forums proposed at Point 8.

Homelessness Australia also recommends a review of spousal visas and the active dissemination of clear guidelines which support women experiencing violence who hold temporary spousal or sponsored visas and/or an 'Assurance of Support' provided by a violent or neglectful partner or other sponsor.

### ***Planning and co-ordination mechanisms across portfolios***

Each Commonwealth Department with an involvement in the proposed National Homelessness Strategy should develop a plan to progress these issues and set targets to improve their response to homelessness including prevention and provision of quality service to people experiencing homelessness. Each Department should conduct a self-evaluation of progress against the plan annually.

These plans must share a common definition of homelessness that encompasses primary, secondary and tertiary homelessness as discussed in detail at Point 7.

An inter-departmental working group could be formed to share strategies and learnings from across the Commonwealth Departments. This group, or each Department, should report annually to the coordinating body for the National Homelessness Strategy, the Australian Council on Homelessness (ACH). The ACH is discussed at Point 9.

## 6 Build on existing State/Territory homeless strategies

### ***Improve mainstream services' response to homelessness***

Improving the mainstream response to homelessness will also need to focus on programs administered at a State/Territory level, as this is where the bulk of service delivery takes place.

For mainstream government social services to respond better to the needs of people experiencing homelessness, their ability to target resources at those who are homeless must be enhanced. Many mainstream social programs have long waiting lists. More than 40 per cent of community services turned away people who were eligible for support according to the 2008 ACOSS Community Sector Survey.<sup>38</sup> At the same time, State and Territory programs lack the ability to

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<sup>38</sup> ACOSS 2008, *Australian Community Sector Survey*, p.2

identify when people who are homeless are using mainstream programs. For example, a recent audit of the NSW State Government's response to homelessness found that "we were unable to determine how well the government is responding to homelessness statewide. This is because there are no statewide performance measures or targets on homelessness". Only two Departments indicated that they knew whether people who were homeless used their programs, the Department of Community Services, which administers SAAP, and Housing NSW.

The response of mainstream services could be improved using the new Specific Purpose Payment (SPP) arrangements. For example, States/Territories could be required to provide a proportion of their funding under SPPs to homeless services, including SAAP services. SAAP agencies could negotiate the use of funding from mainstream services to provide wrap-around support packages for their clients. For example, a homelessness dental plan could be contained within the health SPP and accessed by providers to enable targeted treatment of people experiencing homelessness.

SPPs could also be used to commit State and Territory Governments to meet targets on improving the responsiveness of mainstream programs to people who are homeless. For example States and Territories could be provided with additional funding under SPPs when they meet targets to develop systems that identify when people who are homeless are supported by mainstream programs.

### ***National standards to minimise systemic failures in areas of State and Territory program delivery***

State and Territory homelessness strategies must reverse systemic program failures that contribute to homelessness. This could be achieved by establishing national standards in a range of areas.

Examples of deficient State and Territory programs that contribute to homelessness include state care, mental health and prison administration.

#### *State Care for young people*

A high proportion of young people who leave State care are not provided with necessary support as they transition to independent living. This places them at risk of homelessness. A recent study found a third of young people surveyed had experienced homelessness since transitioning out of state care.<sup>39</sup>

#### *Mental health services*

Mental health services do not provide adequate support or support housing options for clients after they receive care, leaving many at risk of homelessness. Studies have found a high prevalence of mental illness amongst clients of homeless services, including rates of psychotic illness that are well in excess of the rate in the general population.<sup>40</sup> It has been widely suggested that this is a result of under-resourcing community-based care since deinstitutionalisation.<sup>41</sup>

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<sup>39</sup> Create Foundation 2008, *Report Card: Transitioning from Care*, p.44

<sup>40</sup> Hodder, T, Teesson, M, Buhrich, N 1998, *Down and Out in Sydney: Prevalence of Mental Disorders, Disability and Health Service Use among Homeless People in Inner Sydney*,

<sup>41</sup> Senate Select Committee on Mental Health 2006, *A National Approach to Mental Health: from crisis to community*, p.16

### *People leaving prison*

People leaving prison have extremely limited access to housing. A 2004 study found that Western Australia and Victoria were the only jurisdictions where correctional and public housing authorities were working in direct collaboration to provide dedicated, specialist housing for offenders leaving custody.<sup>42</sup>

To reduce homelessness, there must be national standards of support for people exiting institutions administered by the States and Territories, including the following:

- Young people leaving state care

Homelessness Australia welcomes the Government's announcement that it will develop a national framework on child protection. This framework must canvass options for young people leaving state care to minimise their risk of homelessness.

- People who are homeless and need access to clinical mental health services

A range of existing models provide support and housing for people living with mental illness. Homelessness Australia supports the Mental Health Council of Australia's call for the expansion of Community Supported Recovery Services, which provide additional support following discharge from periods of hospitalisation for acute mental illness. The NSW Government delivers the Housing and Support Initiative (HASI) which is profiled in the Green Paper. Homelessness Australia recommends further exploration of the strengths and weaknesses of these models and their possible expansion.

- People leaving prison

The core components for successful support models for people leaving prison are well understood. Support should comprise subsidised rent and food, pre-release assessment and planning, intensive case management, programmatic outreach support, exit planning and ongoing transitional referral support. Service responses need to consider mental health issues, drug and alcohol treatment, vocational training and employment assistance, family reunification, independent living skills and long term housing plans.<sup>43</sup>

### ***Planning and co-ordination mechanisms across State and Territory governments:***

Every State and Territory should be obliged to develop a Homelessness Strategy. These strategies must be consistent with one another and with the overarching National Homelessness Strategy, and must share a common definition of homelessness that incorporates primary, secondary and tertiary homelessness. Each State and Territory should report annually to a strong national co-ordinating body as discussed in detail at Point 9.

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<sup>42</sup> Willis, M 2004, *Ex-Prisoners, SAAP, Housing and Homelessness in Australia*, p.59

<sup>43</sup> Willis, M 2004, p.73

## Legislative and Accountability framework

### 7 Create a Homelessness Act

The whole-of-government response to homelessness must be underpinned by rights-based legislation in the form of a Homelessness Act.

The purpose of the Act is to provide a legal framework for the protection of people experiencing homelessness that will guarantee their right to access basic services, participate in community life and have equal access to community resources. The definition of homelessness used in the Act must include primary, secondary and tertiary homelessness.

Crucial inclusions in the Act are:

- A statement of the responsibility of mainstream social services to provide care in accordance to the level of need of service users who are homeless;
- A statement of the responsibility of all agencies that are part of the whole-of-government response to homelessness to actively work towards the resolution of homelessness by implementing systems and practices to respond to their homeless clients;
- A commitment to ensuring the availability of crisis accommodation to people experiencing homelessness. This must include a minimum standard of service delivery. The current SAAP Act stipulates that crisis accommodation must be provided in a non-discriminatory manner and not be contingent on the client's ability to pay for service. These minimum standards must be preserved in the move to a holistic Homelessness Act;
- Legislation must ensure all agencies and individuals are obligated to provide appropriate permanent or long-term accommodation (that is, affordable, safe, accessible accommodation and where necessary with tenancy support provided at a level appropriate to the person's need while providing a choice between support providers).

The Act will require enforceable provisions. These should be backed by changes to the Anti-discrimination legislation that make discrimination on the basis of homelessness illegal.

The Homelessness Act must also prescribe reporting arrangements that include the Minister reporting to Parliament annually. This accountability mechanism will allow for transparency in terms of the targets that both the Federal and State government need to meet.

### 8 Set targets and develop a strong national research agenda

#### *Targets*

Homelessness Australia supports the use of the Australian Bureau of Statistics Census night count of the number of people who are homeless as a high level indicator of the success of the new National Homelessness Strategy.

We must be cautious in our use of homelessness data, including national counts. In developing and assessing a new response to homelessness, Homelessness Australia strongly advocates the continued use of Mackenzie and Chamberlain's authoritative definition of homelessness, which includes but distinguishes between primary, secondary and tertiary homelessness.

We must not focus on one experience of homelessness to the neglect of others. Homelessness is an iterative process and people tend to experience more than

one type. For example, it has been estimated that while only two per cent of people who are homeless consistently sleep rough, 15 per cent were in primary homelessness on Census night.<sup>44</sup>

The Census count of people who are homeless is only undertaken once every five years. To track our collective progress against the White Paper, we will need to consider supplementing the national count with State and Territory, or local counts of people experiencing homelessness. This would need to be done in consultation with the relevant local and State/Territory authorities including the State or Territory homelessness peak body.

We will also need to expand on the limitations of a point in time count of homelessness. This will add to an understanding of our progress towards reducing the total number of people who are homeless in Australia. We need a greater understanding of the length of time people experience homelessness. Studies have found that a high proportion of people using SAAP services have been homeless for more than a year.<sup>45</sup> We need to understand the extent to which youth homelessness contributes to adult homelessness.<sup>46</sup> Reducing the number of people who make that transition will be critical to reducing the number of people who are homeless over the period til 2020. We need a better understanding of how to identify people at risk of homelessness. This is so we can understand how effective early intervention strategies are at reducing homelessness.

Targets to reduce the number of people who are homeless must be supported by performance measures that demonstrate whether funding arrangements and policy frameworks have been implemented successfully, and identify barriers to achieving implementation. There are a number of program data sets which should be publicly available to monitor the effectiveness of key programs. Other data sets will need to be constructed to assess the implementation of other programs. Homelessness Australia notes in particular that the SAAP national data collection must be retained and enhanced. If SAAP is repositioned to provide longer term support, the data set will need to be expanded to show how clients are progressing towards achieving outcomes in their case management plan. A set of indicators will also need to be developed to demonstrate successful implementation of Commonwealth and State/Territory homelessness strategies. An important component will be the use of statistical linkage keys (SLK) to look at the movement of clients between different programs. For example, if we want to demonstrate that we have reduced the number of young people leaving state care who become homeless, a possible way of demonstrating this is to look at the movements between out of home care and SAAP using a SLK.

Progress against targets and performance indicators should be captured in an annual report by the Minister to Parliament on the implementation of the White Paper.

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<sup>44</sup> Chamberlain, C 2008, 'How Many People Experience Primary Homelessness?', *Parity*, vol. 20, issue 3, pp.6-7

<sup>45</sup> An unpublished study of homeless services in inner-city Sydney found that more than 50 per cent of people had been homeless for more than 12 months.

<sup>46</sup> Recent studies have found that up to 40per cent of people who are homeless as adults were first homeless as young people. See Johnson et al 2007, 'Homelessness in Melbourne: confronting the challenge', RMIT, p.

### *Homelessness research*

The successful implementation of the new approach set out in the White Paper will require a robust research agenda.

One component of this agenda is a major longitudinal study, of similar scope to other national longitudinal studies. This study will add significantly to the evaluation and continual development of the new approach to homelessness. Its major contribution will be to improve understanding of factors enabling people to move permanently out of homelessness, and barriers still preventing this transition. Some longitudinal studies have been undertaken to date, but these are small-scale and focus on a single jurisdiction or homeless population (for instance young people)<sup>47</sup>. A national longitudinal study by contrast will be multi-jurisdictional, long-term and encompass the diverse range of experiences of homelessness.

A robust, practice and policy-relevant research agenda will be supported by the establishment of a National Homelessness Research Association. This Association will draw together people with an interest in homeless research including service providers, academics, Government and others. The Association will meet regularly to assess emerging issues and research gaps, and will be able to access a stream of funding for research projects. The establishment of the Association will address some of the limitations of the homelessness research framework identified at the National Research Seminar<sup>48</sup>, including that research funding is limited, small-scale, and often tied to program evaluations.

Current emerging research priorities include:

- Cost/benefit analysis of homeless services;
- Assessing the effects of changes in policy, programs or economic conditions on the level of homelessness; and
- National modelling of demand for homeless services, to inform the roll-out of homeless programs at a local level.

## 9 Resource strong national, State and Territory homelessness peak bodies

### *Improved sector representation, coordination and information sharing through a stronger national peak*

Homelessness Australia as the national peak body has a significant role to play in the implementation of the White Paper.

As the representative of the homelessness sector to government and the community, Homelessness Australia contributes to homelessness policy development through the outcomes we deliver under the National Secretariat Program (NSP). These include advice to Government on homelessness policy, formulated on the basis of the experience of our member organisations.

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<sup>47</sup> Guy Johnson performed a valuable longitudinal study in his thesis “On the Move: A longitudinal study of pathways in and out of homelessness”. However, it focuses only on the homeless in Victoria, whereas a large scale national study might capture geographical differences and movements of persons experiencing homelessness. Project I (<http://www.projecti.org.au/>) is another longitudinal study that focused specifically on youth homelessness in Melbourne, which contains similar limitations.

<sup>48</sup> The Homelessness Research Seminar was held in Melbourne during April, 2007. It invited key stakeholders with an interest and commitment to research regarding homelessness to discuss key issues and to shape and inform future national strategies and initiatives for the development, coordination and implementation of homelessness research in Australia.

In the current financial year, Homelessness Australia's deliverables against our NSP contract have included:

- Hosting the 5<sup>th</sup> National Homelessness Conference, attended by more than 1000 delegates and opened by Prime Minister Kevin Rudd;
- Hosting the Green Paper Roundtable for 100 invited guests in March, to provide input into the development of the Green Paper;
- Supporting our national policy reference groups to meet face-to-face to network, share best practice and identify emerging issues for homeless services;
- Providing opportunities for policy input and advice from providers of services to people in regional and remote areas, to clients of non-English speaking backgrounds and to Aboriginal and Torres Strait Islander people;
- Sharing information and contributing to sector and public debate through various publications including an election statement, regular media comment, submissions to Federal Government, and member communications; and
- Working in partnership with agencies including Federal Government agencies and State/Territory homelessness peaks on specific projects.

Homelessness Australia has delivered these outcomes with 4.2 FTE staff (2 full-time and 4 part-time staff). This includes a part-time Events Co-ordinator who was employed for the 2007-08 financial year to support our hosting of the Conference.

Homelessness Australia is an effective small organisation which continues to consolidate its position as the national advocate for the homelessness support sector and for the rights of people experiencing homelessness. Our ability to contribute most effectively to the implementation of the White Paper is however constrained by our small size and limited access to funding. Below, Homelessness Australia outlines specific tasks in addition to our core existing work that we could undertake in support of sector engagement with the new approach set out in the White Paper.

#### *Expanded activities under the National Secretariat Program*

An increase in base funding under our NSP contract would significantly expand the contribution Homelessness Australia can make to the roll-out of the White Paper.

#### a) Additional sector reference groups.

Homelessness Australia has identified the need to better represent a number of significant cohorts within the homeless population. These are:

- Indigenous people. One in every 10 people who are homeless is Indigenous<sup>49</sup>;
- People from a non-English speaking background. This cohort has ongoing difficulty accessing services, and requires a distinct service response; and
- People who are homeless in rural and remote Australia.

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<sup>49</sup> Chamberlain, C and MacKenzie, D 2003, *Counting the Homeless*, p.5  
*Many Ways Home: a National Homelessness Strategy for Australia*  
Homelessness Australia Green Paper Submission

One effective way to raise the profile of issues affecting these groups, and to increase Homelessness Australia's effective representation of issues for these communities, is to create three new policy reference groups based on the model of our founding councils.

These reference groups would meet face-to-face twice a year in the same manner as our current reference groups for youth services, domestic violence services, and adult services. These additional reference groups would provide critical insight into the implementation of the White Paper among their constituencies and could be tasked with providing a six-monthly report on implementation among these populations.

Additional sector reference groups would cost an estimated \$55,000 per annum. This is based on current funding to enable our 3 existing policy reference groups to meet face to face twice a year. This would also include funding for secretariat support, including organising flights and accommodation, and developing agenda and other material.

b) Policy, research and community education projects

Specific projects that Homelessness Australia could be funded to undertake as part of the implementation of the White Paper include:

- Reviewing changes to service systems set out in the White Paper;
- Undertaking sector surveys to measure progress against identified targets and goals,;
- Co-ordinating national research projects; and
- A significant community education and engagement campaign to build and capitalise on policy reforms by generating involvement in a 'whole-of-community' homelessness response.

These projects will be additional to current NSP funding, which is fully allocated on existing core work for the 2008-2009 financial year.

Funding for expanded activities under the NSP would depend on the scope of the particular project. We have highlighted a number of different opportunities where Government may look to work with us as the national peak. We would welcome the opportunity to work with FaHCSIA to develop a series of ongoing projects to continually review White Paper implementation.

*National events to review implementation*

Regular review of the new approach by the homelessness support sector will be critical to its success. Homelessness Australia is well-placed to co-ordinate and host regular gatherings for this purpose, as well as manage ongoing information flows to services. Opportunities include:

- Biennial National Homelessness Conferences

The National Homelessness Conference has been held five times since 1996 and is the only national event that brings together major stakeholders from homelessness support services, Government (Federal, State, Territory and local), academics, researchers and others with an interest in ending homelessness.



The Conferences are excellent opportunities to monitor the progress of the national response to homelessness. It will be critical to receive this feedback on the approach set out in the White Paper over the course of the next 10 years.

There is a strong desire across our sector to see the National Conference held every two years: Eighty-eight per cent of attendees at this years Conference expressed this view.

Funding would not necessarily be in addition to what is currently made available from existing programs. We would need approximately \$110,000 to host the national conference.

- Funding for issue-based conferences every second year

The National Homelessness Conference provides a national perspective on the response to homelessness. This perspective would be enhanced by smaller and more focused national conferences allowing more detailed consideration of specific issues within the national response to homelessness. Issues for discussion could include homelessness among different cohorts, for example indigenous homelessness; relationships with different service systems, for example mental health, alcohol and other drugs, housing; and national research projects.

This event would require funding of \$40,000. The amount necessary is roughly equivalent to funding for communication activities provided under the current National Homelessness Strategy and funding could be allocated as part of the ongoing implementation of the White Paper.

- An annual Roundtable on White Paper implementation

A small roundtable of 100 people from Federal, State, Territory and local government, homelessness support agencies, and other service systems, held annually, would provide a useful and immediate review of progress against the White Paper, and identify new emerging issues.

This event could be similar in structure and format to the Green Paper Roundtable Homelessness Australia hosted in March 2008. This event brought together key individuals in the national homelessness response and provided valuable input to the development of the White Paper.

This event would also require funding of \$40,000. Again, the amount necessary is roughly equivalent to funding for communication activities provided under the current National Homelessness Strategy and could be allocated as part of the ongoing implementation of the White Paper.

### *Supporting State and Territory homeless peaks*

The successful implementation of the White Paper requires a well-resourced peak body for homeless services in every jurisdiction.

State and Territory responses to homelessness are critical components of the national response to homelessness. State and Territory peaks in each jurisdiction are best-placed to provide advice and monitor progress against the White Paper at State and Territory level. Adequate levels of funding are essential to undertake this necessary task.

Not every jurisdiction currently has a funded peak body for homelessness. In some jurisdictions, the peak is unfunded, while in others it is auspiced by other sectors.

Homelessness Australia welcomes the ongoing commitment of those jurisdictions that fund multiple peak bodies providing support to homelessness agencies.

### *Public Benevolent Institution (PBI) and Deductible Gift Recipient (DGR) status*

The Government could also greatly support Homelessness Australia and State and Territory homeless peaks by granting PBI and DGR status.

Peak bodies that represent services working to address poverty and disadvantage should be able to access PBI status. Currently PBI status is only available to those organisations that provide direct relief of poverty. Organisations which argue for improvements to social welfare to prevent or address disadvantage are not given this status.<sup>50</sup>

PBI status would give peak bodies access to Fringe Benefit Tax exemptions (FBT), increasing our ability to attract and retain staff. We note and welcome the Government's speedy resolution recently of the use of FBT by charitable organisations in this way. Extending PBI further to peak bodies would support the intention of the Government to make FBT available to organisations working to address disadvantage.

Peak bodies should also be able to access DGR status. Not having DGR status limits the ability to fundraise from private donors. Donors who have a funding interest in homelessness generally require organisations to have DGR status.<sup>51</sup> The Government can give peak bodies DGR status by listing us by name in the tax law.

## 10 Create a strong national lead agency

A strong national authority is required to co-ordinate and oversee the national response to homelessness. To undertake this task, Homelessness Australia proposes the establishment of a new organisation, an Australian Council on Homelessness (ACH). This proposed body is modelled on the success of the United States Interagency Council on Homelessness. The ACH should co-ordinate the response of multiple agencies in Federal and State/Territory local government, and will also engage with local governments possibly through the Australian Local Government Association. The ACH will also engage homelessness support providers through the national peak body, Homelessness Australia. As a secondary priority, the ACH may have a role to play in engaging the corporate and business sectors in the broader response to homelessness.

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<sup>50</sup> Australian Taxation Office 2003, TR 2003/05, Income tax and fringe benefits tax: public benevolent institutions

<sup>51</sup> For example, see the Australian Directory of Philanthropy, <http://www.philanthropy.org.au/directory/>

An Australian Council on Homelessness would draw together key stakeholders to review progress against the National Homelessness Strategy and provide advice to the Minister. Council membership should include the Minister for Housing, Federal Ministers from key portfolios involved in the Commonwealth Whole-of-Government response, representatives of State and Territory governments, and representatives of the homelessness support sector including Homelessness Australia as the national peak body. Similar Councils or co-ordinating bodies could be established in each State and Territory and must engage with the homelessness sector through the relevant State or Territory peak body.

## Implement a partnership approach

- 11 Support community sector workforce development and simplified contractual arrangements to demonstrate a shared commitment to improved relationships between Governments and the social and community Sector.

A significant segment of services delivered in the new national response to homelessness will involve the work of the social and community sector. In April, Parliamentary Secretary for Social Inclusion Senator Ursula Stephens said that “a strong, vibrant and innovative not-for-profit sector is essential to the social inclusion agenda and to a healthy Australian democracy”<sup>52</sup>.

The community and social services sector must be able to move forward together with the government in the national response to homelessness. The government has already taken the first steps, with the removal of gag clauses, restoring the right of agencies to advocate and seeking frank and fearless advice from those working on the front lines and with specific expertise in social services.

However there are further steps that can be taken to cement strong working relationships and an efficient and skilled community and social services sector.

### *Simplified administration and contractual arrangements*

In a recent survey of service providers, Homelessness Australia found that 70 per cent of organisations were accessing multiple sources of funding or contracts. One of the major barriers to successful service delivery was meeting the administration requirements and criteria required by specific programs.

A national homelessness response requires a simplification of contractual and administrative arrangements, with many agencies receiving specific funding from Federal, State and local government. Federal, State and Territory Governments could simplify contract arrangements by streamlining the number of contracts that agencies have with the same Department. Services could have one contract with each Department for the range of programs that the Department administers. For example, FaHCSIA provides funding for a range of programs that services might be receiving, such as the COAG mental health package and the Stronger Families, Stronger Community strategy. Multiple contracts for different programs could be streamlined into a single contract with FaHCSIA.

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<sup>52</sup> Stephens U 2008, Address to ACOSS Conference, 9 April

*Appropriate salaries and conditions for a specialised, professional workforce and support for the long term viability of the industry*

A national response to homelessness needs a professional, well-funded community sector workforce, with salaries that can attract younger workers, and a workforce development strategy that ensures the strategy's long term viability.

Average pay rates for workers in the community sector are currently lower than the average pay for the population as a whole. The 2007 Australian Services Union members' survey found that almost half of all community sector workers surveyed expressed dissatisfaction with pay.<sup>53</sup>

The sector also faces a workforce ageing at a faster rate than the general population. It is estimated that 10 to 40 per cent of the workforce in the community sector will retire within the next five years<sup>54</sup>. Younger workers in the community sector expressed greater dissatisfaction with wages and conditions. They are more likely to be dissatisfied with wages, conditions and career opportunities.<sup>55</sup>

There are also particular challenges in attracting workers in rural and remote areas. Homelessness Australia is aware of numerous examples. Support to access housing may be required for workers to live in as housing shortages have made rents unaffordable in some parts of rural Australia. Often services need to be able to offer regular transport back to cities for workers to maintain contact with families. Professional development, training and IT can be difficult to access in rural and remote communities. Staff need to be away from services for many days to attend metropolitan training which can leave clients without services.

*Indexation*

Funding for specialist programs and other payments in the national response to homelessness need to be properly funded based on an appropriate indexation that reflects increases in the cost of service delivery. Funding per client in SAAP has fallen in real terms over the last 10 years, from \$3,180 in 1996-97 to \$3,130 in 2005-06.<sup>56</sup> Other programs which support people experiencing homelessness have also received minimal increases in funding.<sup>57</sup> By contrast, the Australian Bureau of Statistics has reported an annual inflation rate of 4.2 per cent through the year to March quarter 2008<sup>58</sup>. The categories of housing, food, transportation, health, and education rose even faster over the year to March quarter<sup>59</sup>.

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<sup>53</sup> Anouk Ride 2007, *Building Social Inclusion in Australia: priorities for the social and community services sector workforce*, Australian Services Union, p.31

<sup>54</sup> ASU 2007, p.44

<sup>55</sup> ASU 2007, p.46

<sup>56</sup> AIHW 2007, p. 88

<sup>57</sup> Perkins' PSP study found the program needs a increase in overall funding to allow case loads to be reduced, more intensive client work to be undertaken and training to be increased. See Perkins 2007, p.129

<sup>58</sup> ABS 6401.0

<sup>59</sup> ABS 6401.0