Homelessness Australia welcomes the opportunity to contribute to the debate around the proposed review of the Counting the Homeless methodology. As the ABS has acknowledged, the Counting the Homeless reports provide the most comprehensive data on homelessness across the three categories of primary, secondary and tertiary homelessness that we have available to us in Australia.

The ABS discussion paper suggests that there is a view that the enumeration strategies employed may in fact result in an over count of the number of people who are identified as homeless on Census night. This would appear to be sharply at odds with the views of those who work in the homelessness sector and the peak bodies that represent them. We believe that the most likely scenario is that the figure of 105,000 underestimates rather than overestimates the true number of people who are homeless on any given night. Having canvassed the Counting the Homeless reports in extensive detail and consulted widely with those working in the sector, Homelessness Australia completely disagrees with the proposition that:

“…There is widespread agreement that the numbers reported in Counting the Homeless are indicative rather than necessarily appropriate for performance indicator construction and may well over-estimate the count of homeless people in Australia in general and that of homeless youth in particular…” (ABS 2009, p.1).

Homelessness Australia has consulted representatives from our member organisations and identified a number of instances in which people who would in fact meet the ABS cultural definition of homeless on Census night are not counted as homeless. Some of these are discussed in more detail later. Examples that we have identified include:

- Women escaping domestic violence who seek assistance from a homelessness service but are turned away and either sleep in a car in a concealed location or are accommodated by a friend or relative for the night.
- Indigenous people in overcrowded households.
- Rough sleepers in the ‘long grass’ in the Kimberley and Pilbara in WA and Darwin-Daly District in the NT.
- Families in private motels paid for by temporary state housing vouchers.
• Single people staying with friends in public housing not named on the lease (due to rules prohibiting sub-letting they often will not identify as residing with the tenant even if this is the case).

The Government has recognised that apart from NDCA SAAP data, the Counting the Homeless reports provide the only comprehensive source of data on homelessness in Australia. There is a suggestion in the ABS Paper that Census data may not be appropriate for ‘performance indicator construction’. In the Homelessness White Paper and the National Partnership Agreements the 2006 figure is quoted as the baseline against which to measure progress towards the headline goal to halve homelessness by 2020. Homelessness Australia is therefore extremely concerned by suggestions that the data used to produced that ‘baseline’ may not be considered appropriate by the ABS. We are not aware of any alternative data sources that could serve as a baseline in the event that the census data is deemed inappropriate for that purpose.

**COMMENTS REGARDING THE PROPOSED OUTPUTS OF THE REVIEW**

• Recommendations for changes to collector instructions for 2011 Census to ensure clarity of procedures used to enumerate people in certain circumstances that may be relevant to homelessness.

Homelessness Australia supports the idea that there should be nation-wide consistency and clarity around procedures used by collectors to enumerate homelessness.

We are concerned however that if significant changes are made to the way in which Census collectors are instructed to identify people who are homeless on Census night then this may adversely affect the ability to accurately measure changes in the number and rate of homelessness between 2006 and 2011. Any such changes will need to be accounted for when seeking to measure changes in the number and rate of homelessness and this could both complicate and compromise attempts to measure progress towards interim White Paper targets.

• Recommendations on how the ABS might change its timing and content for release of Census data to enable users to better understand its use in homelessness.

Homelessness Australia does not believe that releasing raw Census night data without adjustment is at all useful or constructive. There is every possibility that the figure derived from that will be significantly different from a more detailed enumeration at a later stage in the form of the Counting the Homeless reports. We believe this will create confusion and will in fact decrease understanding of how Census data is used in homelessness. In any case, all changes to the content of Census data must be adequately accounted for and explained to enable changes in data to be accurately measured.
• Recommendations on how Census data, in conjunction with other sources, might be used to compile an estimate of the number of homeless people and homeless households in Australia.

Homelessness Australia broadly supports the practice of data linkage and drawing together different datasets relevant to homelessness to count the number of homeless people and homeless households in Australia. We would however again caution that changes to the methodology and sources of data used to enumerate homelessness need to be properly accounted for and explained if the new figures are to be used as a performance indicator against which progress towards White Paper goals and targets will be measured.

ISSUES REGARDING CATEGORIES OF HOMELESSNESS

Primary Homelessness: Rough Sleeping & Improvised Dwellings

Homelessness Australia acknowledges that there are significant differences in the nature of primary homelessness between those in capital cities and rural and remote localities. In capital cities, metropolitan areas and regional centres, the majority of people experiencing primary homelessness are ‘rough sleepers’, while in rural and remote locations, the majority are classified as staying in ‘improvised dwellings’.

Homelessness Australia does not agree with the contention that people staying in improvised dwellings should not be considered homeless if they have an income from employment or are landowners.

We believe that if people lack access to the basic amenities that a home normally affords (a kitchen and bathroom), then people living in that situation should rightly be classified as homeless regardless of their employment status or whether they are making loan repayments for a property without a dwelling that meets the minimum acceptable community standard of a small flat with a bathroom and kitchen.

Primary Homelessness Initiatives under the White Paper

Homelessness Australia supports efforts to more accurately enumerate levels of primary homelessness and we believe that new services for ‘rough sleepers’ and ‘chronic homeless’ can and should be involved in collecting data on primary homelessness in each jurisdiction. The White Paper placed a strong emphasis on the need to dramatically reduce ‘rough sleeping’. One of the core outputs in the National Partnership Agreement on Homelessness commits each state/territory to establish ‘street to home’ initiatives for the ‘chronically homeless’ (primary homeless) including street outreach services.
Given that the second headline goal in the homelessness White Paper is to offer accommodation to all rough sleepers who need it by 2020 it is envisioned that this will be done through and by these initiatives. The ABS should investigate mechanisms to enable the collection of data on primary homelessness from street to home programs. These initiatives are described in greater detail in the state/territory implementation plans that can be accessed via the following link: http://www.federalfinancialrelations.gov.au/content/national_partnership_agreements/housing.aspx

**Primary Homelessness and Indigenous People**

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

We believe that this may also contribute to undercounting of homelessness in the Northern Territory. Many Indigenous people don’t see themselves as homeless if they are living on country and there are familial and kinship connections all around them, they are therefore not going to identify as homeless to Census collectors, even though they may meet the ABS cultural definition. Our members have informed us that there are a significant number of Indigenous ‘rough sleepers’ known as ‘long grassers’ in the Kimberley and Pilbara regions of WA and in the Darwin-Daly district of the NT. There are concerns that a number of these people are not being counted as homeless on Census night.

**Secondary Homelessness**

Accurately enumerating secondary homelessness will be a difficult task no matter what methodology is employed. A large proportion of people (just under 50%) identified as homeless on Census night are accommodated temporarily by friends or family at that point in time.
Homelessness Australia believes that a number of people who have no access to alternative accommodation and are accommodated by friends or relatives on Census night may not in fact be counted as homeless either because the person filling in the Census form may consider their home to be that person’s usual place of residence (e.g. A young person with no alternative fixed address being accommodated by a friend’s parent(s) or the person staying at the address temporarily may not wish to identify this for safety reasons (e.g. Women staying temporarily with a friend/relative after leaving a violent partner).

**People staying in Specialist Homelessness Services**

Homelessness Australia recommends that any method used to count the number of people staying in homelessness services must ensure that they are not able to be identified. This is particularly important for homelessness services that accommodate women and children who are escaping domestic and family violence.

We sought feedback from the national peak body representing Women’s Services (WESNET). There was general consensus that the collection method used in the 2006 Census (‘the green sticker system’ referred to in the ABS paper) afforded sufficient protection of the personal details of clients.

Our discussions with representatives from WESNET confirmed that it is of paramount importance to their services that no identifying details (either the location of the service or personal information about clients) are provided to Census collectors or the ABS. NDCA forms that de-identify clients using alpha-numeric codes should be sufficient. The Domestic and Family Violence sector would have welcomed consultation about the proposed review and would welcome the opportunity to provide advice as the review progresses.

There was general agreement that more outreach was needed in order to reach young people experiencing homelessness wherever they may be staying. For example, a number of young people experiencing homelessness may be receiving assistance from a specialist homelessness service but not be accommodated in one on Census night. By engaging homelessness services in the Census night count, these young people who may not currently be counted as homeless could be correctly identified as experiencing homelessness on Census night. It was stressed that if homelessness services are to be asked to take a more active role in filling out Census forms, they will need to be funded to do this.

Homelessness Australia broadly supports reviewing the methodology employed to count the number of people staying in homelessness services on Census night to ensure the figure is as accurate as possible, as long as adequate safeguards around the personal details of clients and the specific location of services are put in place.
Issues with Counting Young People

Homelessness Australia is concerned about the significant discrepancy between the methodology employed by Chamberlain and MacKenzie who estimate the proportion of the total pool of people aged 12-18 who are experiencing homelessness and still enrolled in educational institutions as being equivalent to roughly 1/3 and the ABS methodology that estimates this proportion to be closer to 2/3. Without the ability to approximate how soon young people leave school/TAFE after becoming homeless, getting exact figures of homelessness for this demographic will continue to be problematic.

We have consulted the National Youth Coalition for Housing (NYCH), the peak body representing providers of homelessness services to young people and sought their views on the Counting the Homeless methodology and enumerating youth homelessness. Homelessness Australia appreciates that the methodology used to determine the number of people aged 12-18 years who are homeless on Census night is complex. We believe that the current methodology employed to do so by Chamberlain and MacKenzie is reasonably accurate. Homelessness Australia recommends that the ABS continue to employ this methodology when seeking to enumerate youth homelessness.

There was general consensus that any change to the methodology employed to adjust upwards for young people not counted homeless using the Census of secondary school students will need to be fully accounted for and explained if data on youth homelessness produced from the 2011 Census is used to measure changes in the youth homelessness count between 2006 and 2011. To enable us to accurately measure progress towards White Paper goals and targets, the methodology employed to compare rates of homelessness must be consistent.

After discussions with NYCH, Homelessness Australia recommends that the ABS endorse a community education and awareness campaign aimed at clarifying for the general public and in particular, householders who may be accommodating a young person with nowhere else to go what secondary homelessness and ‘couch surfing’ mean. Such a campaign could run concurrently with advertising reminding people about the upcoming Census count generally and could include TV ads that explain the nature of questions relating to whether or not the household in which a person is staying on that night is their usual residence and whether or not they have an alternative fixed address.

Overcrowding in Indigenous Households

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

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

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

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

Homelessness Australia recommends that the ABS consult relevant Indigenous agencies to determine how homelessness disguised as overcrowding can be more easily identified.

**Tertiary Homelessness**

Homelessness Australia is broadly satisfied with the present criteria used to define what is and what is not classified as a boarding/rooming house. Homelessness Australia strongly endorses the need to ensure that people staying in boarding houses on Census night continue to be counted as homeless because they have no security of tenure and no access to private amenities such as a bathroom or kitchen which a flat or other private residence in Australia would normally afford occupants.

There are other reasons why Homelessness Australia would advocate that people staying in boarding/rooming houses on Census night should continue to be counted as homeless. Firstly, boarding houses are frequently used to accommodate people who are on waiting lists to access specialist homelessness services. Secondly, people staying boarding houses are frequently exposed to a range of problematic phenomenon that can exacerbate homelessness including; alcohol and other drug use, prostitution, sexual exploitation and violence, as reports produced by the South Australian and Victorian Governments have documented.
Finally, a number of people exit boarding houses into primary homelessness because conditions are so appalling and boarding houses are a form of accommodation frequently accessed by people moving through primary and secondary homelessness, they are not a secure, long term accommodation option and Homelessness Australia believes it is entirely appropriate to continue to count boarding house occupants as homeless.

The AIHW notes in its report *Australia’s Welfare 2009* that at present people staying in caravan parks in vans with no private bathroom and/or kitchen facilities are not presently counted as homeless even though they technically do meet the ABS definition of tertiary homeless. It notes that ‘caravan parks may be used as an alternative form of emergency accommodation to boarding houses, especially outside of capital cities’ (p.291). Homelessness Australia therefore recommends that the ABS conduct further research to determine the feasibility of differentiating between long-term residents in Cabins with private kitchen/bathroom amenities and impoverished families in caravans which do not afford these amenities resulting in occupants having to use shared facilities provided on site.