# Directions Paper for the 10-Year Strategy on Homelessness

## Western Australia 2019-2029

### Department of Local Government, Sport and Cultural Industries

### Submission May 2019

The Western Australian Department of Local Government, Sport and Cultural Industries' (DLGSC) welcomes the opportunity to provide comments on the Directions Paper for the 10-Year Strategy on Homelessness. DLGSC comprises the divisions of Culture and the Arts, Sport and Recreation, Racing, Gaming and Liquor, Local Government, the Office of Multicultural Interests (OMI), and Aboriginal History. The following feedback responds to questions posed in the consultation paper.

## 1. What is the best way to provide advice to government on emerging issues and trends on homelessness over the life of the Strategy?

DLGSC suggests that a representative group be established to:

- guide implementation of the Strategy and oversee monitoring of achievement outcomes

- facilitate collaboration and partnerships between agencies that share responsibility for its implementation

- provide advice to government on emerging issues and trends on homelessness over the life of the Strategy.

This group could be the existing Supporting Communities Forum Homelessness Working Group and supported by a broader network comprising relevant service agencies and groups to provide information on emerging issues and trends, and the impact and effectiveness of actions implemented through the strategy. The broader group could be the Western Australian Alliance to End Homelessness (including representation from the Western Australian Council on Homelessness). DLGSC recommends that any group so established should be representative of the Western Australian community and the range of organisations and service types that have been identified as relevant to its implementation.

For example, it would be important to involve key Aboriginal stakeholder groups such as Aboriginal Corporations and Organisations (for example, Cultural Centres, Native Title Body Representatives and Prescribed Body Corporates; organisations providing services to people from CaLD backgrounds, peak bodies such as the Youth Affairs Council of WA and Council on the Ageing, key regional stakeholders including local governments and Regional Development Commissions in each of the states nine regions; and involving arts and cultural organisations and artists who are involved in participatory and placed based programs and activities.

## 2. How can the Strategy help stakeholders and services in your area to collaborate and work together?

DLGSC considers that, for the Strategy to increase the extent of collaboration between stakeholders and services, it will be important to include specific actions directed at facilitating this, including:

- advisory and decision-making structures that are representative of the Western Australian community and relevant service providers (as noted above)

- adopting a 'collective impact approach' which meets the conditions of a common agenda; continuous communication; dedicated staff and resources to provide a supportive infrastructure, mutually reinforcing activities, and shared measurement

- considering how procurement processes can encourage collaboration and partnership rather than competition

- development of co-located service hubs, and a focus on a whole-of-life case management approach to service delivery which could encourage closer working relationships

- establishing a process that monitors outcomes in relation to this and other Strategy goals.

The Directions Paper notes that mental health and alcohol and other drug issues, and family and domestic violence, are all issues that can contribute to homelessness. DLGSC therefore recommends that the 10-Year Strategy on Homelessness 2019–29 be aligned to, and consistent with, the Western Australian Mental Health, Alcohol and Other Drug Accommodation and Support Strategy 2018–2026 and the 10-Year Strategy to reduce Family and Domestic Violence in WA that are currently under development. This could support and enable development of links between relevant agencies.

Co-located service hubs and case management approaches would also facilitate links between stakeholders and services.

As the Directions Paper notes, homelessness does not occur in isolation from other life challenges and is often a result of them. Challenges can include mental health and/or drug and alcohol issues, family and domestic violence (FDV), family breakdown/conflict and unemployment. For some people from refugee and migrant backgrounds, there are other challenges including language barriers, a history of torture and/or trauma, interrupted education and the challenges of settling in a new country.

There is also a correlation between homelessness and levels of unemployment and income support. The Australian Bureau of Statistics (ABS) on Survey of Income on Housing (2015) that refers to poverty after housing costs (AHC) shows that the poverty rates for sole parent families (33 per cent), unemployed families (40 per cent) and public renter families (48 per cent) are around two-and-a-half times, three times and three-and-a-half times higher than the national rate of 13%.[1] The poverty rate is also significantly higher for those who mainly rely on a social security payment according to the type of payment received. For example, the incidence of poverty is much higher among Newstart recipients (55 per cent) than among Disability Support Pension recipients (36.2 per cent). With the recent changes in jobseeker compliance requirements, the risk of homelessness can even increase further. Given that the strategy focusses on prevention and early intervention, and that almost two-thirds (61 per cent) of the respondents are not attending any education institutions and almost half (48 per cent) are youth and young adults, links to employment, training and income support would be an important action area to protect against the risk of homelessness.

To address all these issues, it is vital that services are not only address homelessness but also the range of other factors impacting peoples' lives, and that they have the necessary skills and expertise to do so in culturally appropriate and effective ways. This requires a case-management approach undertaken in partnership and collaboration with relevant agencies including those providing mental health, AOD and employment services. 'Wrap-around' approaches would help ensure that people are enabled and better equipped to embark on the pathway out of homelessness and into a life that offers greater security and improved health and wellbeing. DLGSC suggests that this would include links to education, training and employment services which can provide a pathway out of homelessness, particularly in terms of supporting integration into the community. Sport, recreation, arts and cultural groups can all play a part in this regard.

This approach is relevant to all three Focus Areas and to other cohorts such as young people, people from culturally and linguistically diverse (CaLD) backgrounds, those who identify as Lesbian, Gay, Bisexual, Transsexual, Intersex or Queer (LGBTIQ) and seniors. For these groups, it also requires working with specialist services that are skilled in working with particular cohorts. For Aboriginal people, it is critical to provide coordinated, Aboriginal community led strategies to address issues that lead to homelessness, such as overcrowding, previous contact with the criminal justice system, mental health issues, trauma (including intergenerational trauma), domestic violence and transiency.

For people from CaLD backgrounds, it requires prominent involvement of relevant CaLD service delivery organisations in the planning and delivery of programs and services. Specific issues affecting this cohort include:

- understanding the concept of 'homelessness', access information about and accessing these services

- a history of torture and/or trauma

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[1] (https://issr.uq.edu.au/files/3347/FINAL_for_print_AHM_full_report.pdf).

- interrupted education

- settlement challenges including adjusting to a new culture, understanding laws and regulations and navigating systems

- access to culturally appropriate services (including access to interpreters)

- discrimination in accessing housing

- access to appropriate housing for those with large families

- understanding their tenancy rights and responsibilities including how to maintain a home

- limited access to social welfare support for those who have entered through Australia's skilled migration program and must wait up to four years to be eligible.

Women on temporary visas experiencing family and domestic violence are a particularly vulnerable group who require specialised assistance and support, however, they currently have limited access to services and support payments.

## 3. How can the Strategy support better data collection on outcomes for individuals?

DLGSC suggests adoption of an agreed Outcomes Based Evaluation approach and collecting data to measure the outcomes, changes in behaviour and benefits to participants. DLGSC also recommends that data collection and analysis is conducted with a view to applying both a gendered and cultural lens. This will enable identification of issues impacting particular groups, comparative levels of access, and contribute to the development of evidence-based practice. This is important to achieve equitable access and outcomes for all groups.

It is also noted that data is likely to underestimate the numbers of Aboriginal people and people from CaLD backgrounds who are homeless and this should be taken into account in data collection and analysis.

Cross-tabulation of data is also important where issues of intersectionality are being considered. Intersectionality can reveal multiple and layered levels of disadvantage which may require equally mixed and layered approaches to and levels of service delivery. Collection of such data would also assist in determining the type and extent of financial, human and material resourcing required to effectively support individual clients.

DLGSC notes that the *Homelessness in Western Australia: A review of the research and statistical evidence* report does not include statistics relating to people from culturally and linguistically diverse (CaLD) which suggests a paucity of data in this area. Given that 32.2 per cent of Western Australians were born overseas,16.6 per cent were born in non-main English speaking countries, and 17.7 per cent spoke a language other than English at home, it is vital that data collection is enhanced to collect cultural and linguistic data. Without such data, the evidence base for policies and programs impacting this population cohort is severely limited.

While the Directions Paper includes reference to data relating to people from CaLD backgrounds, this cites broad data indicating that in 2017-18, 12.7 per cent of people accessing specialist homelessness services in Western Australia identified as being born overseas, the top three regions being Sub-Saharan Africa (563 people), Oceania and Antarctica (508 people) and South-East Africa (444 people).

Further disaggregation of data would provide more nuanced evidence to inform the development of programs and services. DLGSC recommends that cultural and linguistic data is collected wherever possible by all relevant services, and in line with the Australian Bureau of Statistics (ABS) Standards for Statistics on Cultural and Language Diversity. This sets national standards for measuring diversity through a core and standard set of cultural and language indicators. It includes standard questions to be asked. By using the core and standard sets, it provides consistency in the collection of data and enables comparisons and links to be made and issues and trends identified. The core set comprises country of birth; main language other than English spoken at home; proficiency in spoken English; and Indigenous status.

The other indicators in the standard set are: ancestry, birthplace of parents, first language spoken, languages spoken at home, main language spoken at home, religious affiliation and year of arrival in

Australia. DLGSC recommends collection of at least the minimum core data set and to identify and include other standard variables as appropriate.

Year of arrival in Australia would also be useful since circumstances can be different for migrants who arrived many years ago compared with those who arrived more recently. The DLGSC Office of Multicultural Interests' *Guide to cultural and linguistic data collection for the WA public sector* is based on the standards. See:

https://www.omi.wa.gov.au/Resources/Publications/Pages/ViewPublication.aspx?DocID=61

Information sharing between agencies of relevant data can support development of strategies to address issues of concern. Data analysis exploring 'customer/client journey' may be useful, providing an opportunity to understand the entwined issues of settlement, trauma, language, support networks, education and employment. Data can be aggregated and de-identified where privacy and confidentiality is a concern.

DLGSC also notes that, although the review report cites several definitions of homelessness, the Directions Paper does not reference any of these. It is therefore recommended that the Strategy provides a clear definition of homelessness and that relevant data is collected against agreed indicators to identify both prevalence and type.

The availability of data for local government area would also assist both local governments and service providers in specific areas to identify and monitor service needs and availability.

### 4. Are these the vision, principles and focus areas that you would like to see in the Strategy?

**Vision**

DLGSC supports the intent of the vision that 'Everyone has a place to call home and is supported to achieve stable and independent lives' but suggests it the Strategy be underpinned by a rights-based approach that acknowledges that housing is one of the most basic human needs and that it is the right of all Western Australians to have a safe and secure place to live in peace and dignity'.

This is in accordance with Article 11 of the International Covenant on Economic, Social and Cultural Rights, to which Australia is a party, which recognises the right of all people to adequate housing and commits state parties to take appropriate steps to ensure the realisation of that right. Article 11 recognises, ".... the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing..." and that "States Parties will take appropriate steps to ensure the realization of this right".

Without a right to housing, many other basic human rights will be compromised including the right to family life and privacy and the right to development. Having a secure place to live is fundamental to a person's dignity, physical and mental health, and quality of life.

**Principles**

DLGSC supports the intent of the draft Principles but recommends that they be aligned and consistent with those of the draft Mental Health and Alcohol and Other Drug Accommodation and Support Strategy which are articulated below (with amendments highlighted that DLGSC has proposed.

- **Individual rights:** Accommodation will be available ***to all Western Australians*** with mental health and/or AOD issues that are consistent with the human rights framework. All individuals have the right to an adequate standard of living, free from discrimination, and ***equitable*** access to affordable, appropriate, stable and secure housing.

- **Personalised**: Accommodation and support will align to an individual's personal and cultural needs and will provide a foundation from which individuals can make choices. Providers will work in partnership with individuals and their families/supporters to co-plan and co-design ***and co-review*** recovery-oriented supports.

- **Inclusive communities**: Accommodation and support will enhance connection to a supportive network of people and community organisations. The individual will be supported to access communities of choice in an environment that is free of stigma.

- **Effective system-wide partnerships**: Accommodation and support for Western Australians with mental health and/or AOD issues will be available across clinical and non-clinical settings in an integrated, coordinated, collaborative and seamless system. Government agencies, non-government organisations and the private sector will work together with consumers, families and carers to develop effective partnerships and provide an integrated service response system.

- **Continuous improvement**: Accommodation and support options will be aligned to best practice standards and initiatives. There will be system-wide ***standardised data collection***, quality controls and measures in place to monitor, track, review and improve the system and options available.

DLGSC has suggested that a principle be added as follows and this is also recommended for the 10-Year Homelessness Strategy:

- **Equitable representation**: Workforce and decision-making structures will be representative of the community and clients they serve.

In terms of the Principles as articulated in the Directions Paper, DLGSC would propose amendments as follows:

1. That the text following Principle 3 'People's needs are at the heart of our responses' be amended to read:

   People's needs and lived experience are at the centre of service design and delivery. People are treated with dignity and respect, with a focus ***on responding to their individual and diverse needs and*** supporting their individual strengths.

   This would highlight the diverse characteristics and needs of Western Australians and the importance of a tailored, rather than 'one-size-fits-all' approach.

2. That Principle 6 be amended to read

   Programs and services are based on evidence of what works'.

   This removes the amorphous 'We' and focuses on the outcome sought.

3. That Principle 7 be amended to read:

   'Accountability in the achievement of outcomes'.

   This likewise removes the 'We' and focuses on the outcome sought.

DLGSC also recommends inclusion of relevant key features of Contemporary Service Models (CSM) which are also articulated in the draft Accommodation and Support Strategy. This includes approaches that: are age-appropriate and involve a workforce that includes peer workers and that:

- are co-designed and co-produced by consumers, carers and family members

- are recovery-orientated, person-centred, strengths based, flexible and responsive, individualised, tailored support approaches

- are culturally secure, culturally competent and diversity responsive and recognise and respond to Aboriginal and Torres Strait Islander cultures, values and belief systems

- provide seamless integrated system of accommodation and support

- have no requirement for a person to be 'clinically' or 'socially' stable for them to be offered housing.

- provide robust orientation processes for tenants.

**Focus Areas**

DLGSC supports the Focus Areas as articulated in the Directions Paper but notes that across each it is important to recognise the role of specialised services to address the needs of specific cohorts. For example, specific expertise is required to support individuals and families from migrant and refugee backgrounds in a holistic manner to facilitate their integration into the community and address their 'whole of life' needs. This is also important for other cohorts such as Aboriginal people. It is also vital that the needs of people in regional communities are also considered.

It is therefore recommended that the relevant actions be amended as follows:

- Focus Area 1: Sustainable pathways out of homelessness, Direction 1.2: Make more beds available in low-barrier crisis and short-term transitional accommodation.
  - Action: Exploring new models or expanding existing models for crisis and/or low-barrier accommodation and support *in both metropolitan and regional areas.*
- Direction 1.3: Improve service delivery through innovation and collaboration.
  - Action: Support housing services to increase their use of case management models *that include partnerships and collaboration with the range of organisations servicing specific population cohorts.*
- Focus Area 2: Prevention and early intervention and Direction 2.2, which refers to ensuring that support services are culturally appropriate.
  - Action: Ensure that support services are culturally appropriate and meet the needs of Aboriginal people and people from culturally and linguistically diverse (CaLD) backgrounds including delivery by Aboriginal Community Controlled Organisations *and CaLD specific service organisations*.
- Focus Area 3: System transformation and Direction 3.2: Implement integrated, whole-of-government responses to homelessness and Direction 3.3: Roll out consistent, trauma informed practice across programs and services.
  - Action: Improve links between homelessness services, mental health, alcohol and other drug (AOD), *and related services, including those working with Aboriginal people, people from CaLD backgrounds, children and young people, LGBTIQ and seniors.*

DLGSC also notes that there are likely to be prevention and early intervention initiatives other than those detailed in the Directions Paper. For example, on application, the Director of Liquor Licensing can declare a private residence as liquor restricted premises which makes it an offence for persons to bring or attempt to bring, possess or consume liquor on that premises. While the intent of the declaration is to empower the occupier of the premises to refuse entry to persons possessing liquor—family members and/or friends who may cause harm—DLGSC (Racing Gaming and Liquor) has received applications from some tenants who have been assisted by the Department of Communities (Housing) to apply for their premises to be declared liquor restricted, in some cases because their tenancy is at risk and they are on the last strike before eviction and potential homelessness.

Community arts and cultural development processes, artists and arts organisations involved in social change and delivering social impact, are valuable and assist to break down barriers and educate the community about homelessness. Their work helps reduce the real and perceived stigma and discrimination associated with issues like homelessness. They do this by building on community assets and strengths and partnering across sectors to effect change.

## 5. What actions would you like implemented as a priority under each focus area in the Strategy?

DLGSC considers that the No Wrong Door Approach is critical to the success of all the actions within the proposed Strategy but note that for some groups, including people from migrant and refugee backgrounds, understanding of the concept of homelessness may not be understand and knowledge of available mainstream support services may be limited or non-existent. DLGSC suggests that the following priority actions be priorities for each Focus Area:

- Focus Area 1: Sustainable pathways out of homelessness

  Noting consultation feedback regarding the lack of crisis accommodation, readily available and appropriate information and lack of understanding of homelessness, DLGSC recommends:
  - Action to address identified shortfalls in crisis and short-term accommodation for clients experiencing homelessness
  - Support for those experiencing homelessness to build community networks and assist social and community integration.

- o Research to identify issues impacting homelessness among people from CaLD backgrounds, the barriers experienced in accessing homelessness support and the service needs of this cohort

- o A review of funding policies, programs and processes to identify how they can encourage increased collaboration and case-management approaches that:
    - recognise and respond to the diversity of people at risk of, or experiencing, homelessness
    - apply a whole-of-life approach to addressing clients' needs
    - encourage collaboration across agencies to address them.

- Focus Area 2: Prevention and early intervention

  DLGSC recommends prioritising:

  - o mapping the range of agencies involved in the servicing of clients requiring homelessness assistance
  - o across-agency reporting on homelessness indicators as noted below
  - o development of a system-wide process that encourages development of cultural competency across service delivery agencies including both front-line and management staff and promotes workforce diversity.
  - o funding for specialist services that address the needs of specific cohorts.

- Focus Area 3: System transformation.

  DLGSC recommends prioritising development of:

  - o a common definition of homelessness, indicators and standardised system-wide data collection processes to identify both prevalence, type and client characteristics (including gender, age, disability, Indigenous status, country of birth, language other than English and year of arrival in Australia)
  - o consistent, system-wide protocols regarding information-sharing, assessments and referrals between agencies
  - o a process to enable monitoring of achievement of Strategy outcomes and which facilitates collaboration and partnerships between agencies that share responsibility for its implementation.

## 6. Are there any cohorts that are missing?

DLGSC notes that none of the specific cohorts described in the Directions Paper are homogeneous. While they may share common characteristics, there will be diversity in terms of age, gender, culture, religion, language, (dis)ability and a range of other variables such education and employment levels and access to/receipt of welfare. It is important that the Strategy acknowledges the multifaceted layers of the community's diversity and that related policies, programs, services and actions provide the flexibility to respond appropriately to each individual's unique needs and circumstances while maintaining appropriate levels of consistency in approach, quality and accountability (including data collection and reporting).

DLGSC notes that the Directions Paper includes children and young people and refers to services seeing a growing number of LGBTIQ young people and concerns regarding appropriate responses for young women. DLGSC suggests that young people who have leaving out-of-home care, and those who have dropped out of school may also be vulnerable to homelessness.