

Directions Paper for the 10-Year Strategy on Homelessness ECCWA RESPONSE

1 Background:

1.1 The Ethnic Communities Council of WA is the state's peak ethnic umbrella organisation and its objects include inter alia:

- To act as the peak body for ethnic communities in Western Australia, that shall advocate for the rights of ethnic communities in ensuring the protection of these rights.
- To ensure the rights of the ethnic communities including effective participation in decisions which affect them, and encourage the sharing of community resources.
- To do and to perform all acts, matter and things as are charitable and for benevolent purposes having public benefit in accordance with the law of the State of Western Australia and the law of the Commonwealth of Australia and to disseminate any information within a Social Justice framework that achieves the objectives of the Council in ensuring equity and access to and for ethnic communities.

In fulfilling these objects the Council has responded to many inquiries, consultations etc. organised by state and commonwealth government agencies. The Council places a strong emphasis on Human Rights and would strongly argue that a Human Rights framework is essential for addressing Homelessness and other such social conditions effectively. It is from this perspective that the Council is pleased to respond to the abovementioned Directions paper.

1.2 This response is based on feedback received from its management committee, its member agencies that provide services to people who are homeless and/at risk of being homeless as well as other stakeholders.

1.3 In addition to the feedback provided in this response we request that the Department of Communities also take into account the experience and feedback that CaLD Homelessness agencies that it funds under NPAH and NAHA have conveyed to it via service reviews and other means.

2 Introductory comments:

2.1 ECCWA commends the government and the Department of Communities for committing to a 10-Year Strategy to address Homelessness and commissioning a Directions Paper for the same. Such a long term approach is vital for some of the issues that contribute to homelessness or people being at risk of homelessness are many and systemic in nature.

2.2 It is ECCWA's belief that homelessness cannot be addressed with a "one size fits all" approach and it requires an approach that considers the various social and economic determinants that result in people being homeless or at risk of homelessness. In this regard it is commendable that the Directions paper has indicated that "Homelessness is more than a housing problem i.e. People find themselves at risk of or experiencing homelessness for many reasons and require a range of supports in addition to safe, appropriate and affordable housing."

2.3 ECCWA also believes that this cannot be achieved unless the transectionality of gender, age (youth and seniors), Aboriginality, ethnicity/faith, LGBTQI, disability, Non English Speaking and other factors such as recency of arrival in Australia, are effectively considered.

2.4 Given the aforementioned context it is disappointing that there is no reference to CaLD in the section, "Relationship to other strategies", in which the Directions paper identifies other strategies, plans and initiatives that are currently being developed or implemented across the Department of Communities, state and local government, and the community that relate closely to the Homelessness Strategy.

2.5 It is even more disappointing that the report "*Homelessness in Western Australia: A review of the research and statistical evidence*", which has played a significant role in providing the "evidence basis" that influenced the content and recommendations of the 10 year strategy has not

addressed the issues of CaLD homelessness adequately. It did not even have a definition of CaLD and it ignored the CaLD data that it could have easily accessed via the Department of Communities SHIP database. That report also made no reference to the multiculturalism framework that WA has had since former Premier the Hon. Geoff Gallop introduced namely the Multiculturalism Charter, the Anti-Racism Strategy, the Language Services policy and the Substantive Equality policy.

2.6 Finally and most importantly, the glaring absence of CaLD membership in the Supporting Communities Forum-State Homelessness Strategy Working Group is unconscionable i.e. it has 20 members but not even one from the CaLD/Multicultural Sector. This also highlights the woeful under representation of the CaLD/Multicultural sector in the Supporting Communities Forum which does not have a CEO from that sector, in sharp contrast to all other sectors. This situation is much worse when you consider the composition of the Key Stakeholders presumably identified by the Working Group. ECCWA is not mentioned under Peak bodies but there is a reference to the Multicultural Services Centre of WA, which is not a peak body and in any case was not involved in this exercise as a key stakeholder. No CaLD housing services provider is mentioned under NAHA/NPAH funded bodies. There is also no mention of the Minister for Citizenship and Multicultural Interests and the Office of Citizenship under “Ministers” and State and Local Government” respectively. Another notable omission in the consultative mechanism is the absence of ECCWA and or a CaLD Housing Services provider in the Housing Advisory Round Table.

The cumulative impact of all of the above is one of the main reasons why the Directions paper and the 10 year strategy have failed to adequately capture the extent and nature of CaLD homelessness and how best it can be addressed.

3 Supporting Communities Forum- State Homelessness Strategy Working Group

It is pleasing that Homelessness was identified by the Premier as a key priority for the Forum in 2018 and government procurement process of community services was one of the seven working groups that were established by the Forum. The stated Purpose of this working group is, “To develop a project plan that provides an overview of four sub-projects identified to enable effective implementation of the Delivering Community Services in Partnership Policy 2018.”

“The project areas include:

1. Co-design in a Procurement Context;
2. Practice Review; and
3. Co-commissioning / Group Buying and Integrated Services.
4. Outcomes based procurement practices (on hold).”

“The Key stakeholders are dependent on the specifics of each project and may include inter alia Not-for-profit community services organisations and Not-for-profit community services peak bodies.” Astoundingly, ECCWA has not been included in the latter and it is not aware of any CaLD services provider being involved in the capacity of the former.

4 Scale of the problem

The Directions paper has some interesting statistics regarding the above and in relation to People from culturally and linguistically diverse backgrounds, it states that they “make up a significant minority of people accessing homelessness services. In 2017–18, 12.7% of people accessing specialist homelessness services in Western Australia identified as being born overseas. The top three regions that people were born were Sub-Saharan Africa (563 people), Oceania and Antarctica (508 people) and South-East Asia (444 people).

ECCWA believes the extent of homelessness amongst people of CaLD background would be significantly higher when you also consider the situation of older people, those suffering from mental health conditions and women and children affected by family and domestic violence. The Directions paper notes that “Family and domestic violence is the leading cause of people seeking assistance from specialist homelessness services in Western Australia. In 2017-18, 45% of people who accessed specialist homelessness services in Western Australia had experienced family and

domestic violence.” ECCWA understands a significant proportion of women using the services of Refuges are from CaLD backgrounds and this is also not mentioned in the Paper.

In the case of people of CaLD background secondary rather than primary homelessness is more frequent and this has not been captured adequately in any of the reports/data that have been included in the Directions paper.

5 Brief Response to Summary of key findings of Consultations

5.1 Homelessness looks different in every community

ECCWA agrees with the above but there are other factors besides those mentioned under it i.e. geography, climate, demographics, the local economy, acute shortage of housing etc. Secondary homelessness leading to unsustainable overcrowding is highly prevalent within certain CaLD groups especially from new and emerging communities.

5.2 A range of housing options are needed

ECCWA agrees with the above for as described by the Directions paper “People who are homeless or at risk of experiencing homelessness are a diverse group with highly individualised needs. We accordingly support the points made under this section but do wish to emphasise the CaLD communities are heterogeneous and their housing related factors should also be taken into account.

5.3 Make services accessible and integrated

This is an extremely important point and unless services collaborate and work together, provision of holistic, wrap-around support that addresses the needs of families and not just individuals, will not become a reality.

5.4 Government agencies need to work together to reduce barriers

ECCWA wishes to emphasise the importance of the above and in addition to the barriers identified in this section we wish to draw attention to the barriers that people of CaLD backgrounds face including limited access to income security for various reasons relating to residency, visa types etc., low proficiency in English, lack of access to interpreters, inability to navigate a complex unfamiliar system, racism and discrimination etc. A glaring omission in this section is the importance of ensuring that OMI which is unfortunately not located within the Department of Communities is involved in a much more substantial way in the work that government departments do regarding homelessness.

5.5 Need to become more culturally aware and trauma-informed

Whilst all providers need to become more culturally aware and trauma-informed it is pleasing to note that the Directions paper has acknowledged that “Aboriginal people and people from culturally and linguistically diverse backgrounds need a choice between accessing specialist or mainstream services. There is also an acute need for more interpreters for Aboriginal people and people from culturally and linguistically diverse backgrounds to improve access to services.

Meaningful choice will not be available if the policy of mainstreaming is implemented mindlessly and if place-based service provision ignores the reality of the demographic distribution of CaLD and indigenous communities i.e. a much wider interpretation of “place” has to be adopted to ensure this is effectively addressed and government procurement policies should be such that specialist services i.e. “indigenous and CaLD controlled” agencies are considered preferred service providers for such services and are not forced to compete with mainstream providers on an unequal footing.

The Department of Community Development (a previous iteration of the Department of Communities) to its credit (some ten years ago) ensured that the tender for one of nine Homelessness services was worded such that the successful applicant was a “CaLD controlled” agency. Such an approach needs to continue if people from culturally and linguistically diverse backgrounds do have a meaningful choice between accessing specialist or mainstream services.

5.6 Shelter and safety is a priority for people who are sleeping rough

ECCWA agrees with the above and strongly supports the need for more low-barrier accommodation so that it can be accessed by people with mental health issues, people affected by alcohol and other drugs and young people. We note that older people, and people of indigenous and CaLD backgrounds are not specifically referred to and this should be addressed.

5.7 Services should be person-centred, with the flexibility to help people for as long as they need it

ECCWA strongly supports the above and the importance of “the needs of the individual being at the centre of responses to homelessness—supports should be tailored to the needs of the individual rather than a one-size-fits-all approach. We reiterate the point made under point 5.5 i.e. This will not happen if the policy of mainstreaming is implemented mindlessly and if place based service provision ignores the reality of the demographic distribution of these communities i.e. a much wider interpretation of “place” has to be adopted to ensure this is effectively addressed and government procurement policies should be such that specialist services i.e. “indigenous and CaLD controlled” agencies are considered preferred service providers for such services and are not forced to compete with mainstream providers on an unequal footing.

ECCWA also strongly supports the view that there should not be time limits on the provision of accommodation or support services. Services must have the flexibility to be able to assist an individual for as long as they need to help prevent people cycling through repeat episodes

5.8 Give communities a say in designing their own solutions

The above is very important and as pointed out in an earlier section this has not eventuated in the case of CaLD communities. This needs to happen if for no other reason, as the Directions paper states, “Just as the experience of homelessness was different in each region, so were the solutions needed to tackle it. People—including people with lived experience of homelessness—emphasised that they wanted their voices to be listened to and to be active partners in developing solutions for their community.”

5.9. Integrated and accessible mental health and drug and alcohol services are vital

The above is critically important and has ECCWA’s unreserved support. In the case of CaLD communities it is not just the integration that is important but the woeful lack of culturally and linguistically appropriate mental health, suicide prevention and drug and alcohol services.

6 Future Directions

ECCWA’s responses to the proposed vision, principles and focus areas for the Strategy are summarised below

6.1 Vision

The proposed vision i.e. “Everyone has a place to call home and is supported to achieve stable and independent lives” is commendable and ECCWA supports it unreservedly.

6.2 Principles

ECCWA believes that all principles mentioned in the Directions paper are important and is in agreement with what has been conveyed under the following:

- a) Ending homelessness is everyone’s responsibility
- b) Housing is a foundation for life
- c) People’s needs are at the heart of our responses
- d) There is a No Wrong Door approach to service delivery
- e) The right solutions are delivered in the right places
- f) We do what we know works
- g) We hold ourselves accountable for achieving outcomes.

We would like to emphasise from the perspectives of ensuring right solutions are delivered in the right places and that people are provided with appropriate and timely assistance regardless of where they enter the homelessness system, mainstream services have to be complemented by services provided by Indigenous and CaLD controlled agencies.

As mentioned in the Directions paper co-designing with consumers and communities and Innovation are important. Not much has happened in the CaLD space with regard to the former and in the case of the latter there has been no encouragement according to a member agency for its innovative My Home project which has saved the taxpayer millions of dollars in bed days saved, by Graylands patients being provided supported accommodation in the community.

We strongly recommend consideration of the following principles.

- In accordance with the human rights framework that we referred to in our introduction, we believe inclusion of access to safe, appropriate and affordable Housing as a human right is warranted.
- Equitable Funding and Representation which reflects the diversity of the homeless and at risk of becoming homeless populations and the capacity to address this diversity and represent the views and concerns of this population by Indigenous and CaLD controlled agencies. The representation should extend to the Supporting Community Forum, HART, the Homelessness Strategy Working Group and other mechanisms set up for this purpose.

6.3 Focus Areas

Focus Area 1: Sustainable pathways out of homelessness

Direction 1.1: Create and trial different types of housing and accommodation that addresses the diverse needs of people across the homelessness continuum

This is a very important strategy to significantly reduce homelessness. However, sustainable pathways out of homelessness are dependent on a number of factors, including employment, and income security, especially when a person is unemployed or under employed; physical and mental health, family and domestic violence etc.

As stated in the Directions paper, “Intergenerational aspect to homelessness is a reality and the evidence demonstrates that experiencing homelessness as a child or young person makes someone more likely to experience homelessness as an adult.

So ECCWA strongly supports “Investing in young people and families to prevent homelessness among adults and look to strengthen responses to youth homelessness.” CaLD young people are arguably in a more vulnerable situation, if you consider that inter-generational issues are compounded by their growing up with Australian “norms”, whilst their parents may not be,

Another disturbing trend has not been covered and that is the increasing number of single older women being homeless or at risk of homelessness and the need to address their situation. Actions being considered under this direction make no direct mention of the homelessness related to CaLD people.

It is refreshing to note that looking at new, evidence-based housing models for Western Australia has been included as an action item. In this regard we would recommend consideration of “purpose built facilities for Shared Housing” and the “My Home” project that a member agency has been implementing for several years with absolutely no government funding.

We also recommend the continuation of the ARPP, and looking at ways to make Home ownership/retention more affordable. The Key start scheme currently does not have provision for a mortgage to be taken out for upgrading a house if the owner is not already a Key Start customer.

Direction 1.2: Make more beds available in low-barrier crisis and short-term transitional Accommodation

ECCWA supports the above and the actions being considered to achieve it.

Direction 1.3: Improve service delivery through innovation and collaboration

We strongly support the above and whilst we are pleased to note that “the Strategy will seek innovative solutions to improve service delivery and make services more coordinated and person-centred”, we are disappointed that innovative projects such My Home has not attracted any funding to date, especially given that it can be substantially expanded and the agency concerned is prepared to do it if funding is made available for the same.

Focus Area 2: Prevention and early intervention

Direction 2.1: Focus on families and young people to break cycles of homelessness

We support the above and note that cohorts such as refugees and asylum seekers have not been included under the actions being considered with regard to gaps in services.

Direction 2.2: Better support for people who have recently exited homelessness or whose tenancies are at risk

We strongly support the above and are pleased to note that under actions being considered under this direction include more Aboriginal housing support workers; and ensuring that support services are culturally appropriate and meet the needs of Aboriginal people and people from culturally and linguistically diverse backgrounds including delivery by Aboriginal Community Controlled Organisations. We wish to emphasise that delivery of services by CaLD Community Controlled Organisations should be included in this section.

Direction 2.3: No exits into homelessness from government institutions including prisons, hospitals and out-of-home care

We strongly support the above and wish to make the following points. CaLD specific support services are currently not available for people exiting prisons and mental health institutions. These need to be included under **actions being considered under this direction**.

Focus Area 3: System transformation

Direction 3.1 No Wrong Door Approach to Service Delivery

We agree that the current homelessness service system is difficult to navigate, with people being passed between services and having to tell their story multiple times.

We agree that the main elements that should underpin a No Wrong Door approach are:

1. Individuals experiencing or at risk of homelessness can access the support they need quickly and easily
2. Needs are assessed at the first point of entry. If assistance cannot be provided an individual will be directly connected to a service that will support them
3. Parts of the system are connected so that people do not need to tell their story multiple times
4. Workers are appropriately trained and organisations are resourced to deliver a No Wrong Door approach.

This underscores the importance of ensuring that indigenous and CaLD controlled agencies are equitably represented in the service system especially from the perspectives of points 1-3.

Direction 3.2: Implement integrated, whole-of-government responses to homelessness

The above is very important and ECCWA strongly supports it and the actions being considered under this direction. Additionally we believe the following should also be included:

1. Make the collection of ethnicity data not just related to country of birth but other relevant factors such as recency of arrival, proficiency in English, need for interpreters etc. mandatory.
2. The aforementioned data should be used for service planning and for procurement purposes
3. Monitoring of the implementation of the state government's language services policy should be more vigorous and effective.
4. Housing and related needs of CaLD communities in rural and remote areas is not well documented. Perth based multicultural service providers should be resourced to extend their services via Teleconferencing, visiting program etc. and where there is sufficient volume, local services should be established.
5. Ensure that procurement policies and procedures do not hamper unfairly disadvantage CaLD providers when required to compete with large mainstream providers for not just homelessness services but **all** services relating to the determinants of homelessness. Employment and training, mental health and parenting services are three examples.
6. Ensure equitable representation of CaLD peak bodies and CaLD controlled service organisations on the Supporting Communities Forum, the State Homelessness Strategy Working Group and HART.

7. Delivering Community Services in Partnership policy implementation is not being monitored let alone enforced. This needs to change if collaboration and partnerships between the government and community sectors are to flourish.
8. More rigorous research needs to be undertaken on homelessness within CaLD Communities and the updating of the *Homelessness in Western Australia: A review of the research and statistical evidence*, report should be undertaken as a matter of urgency.
9. People with mental health problems and/or mental illness are greatly overrepresented in courts and prisons. It is estimated that around 74 percent of people in prison have some form of mental health problem in comparison to around one-fifth of the general population, with a high proportion having complex mental health and associated needs which are under diagnosed and poorly managed.” It is likely that CaLD representation in this group is growing and it is of concern that there are no CaLD specialist services which addresses the mental health, employment, housing and other needs when
10. Early intervention is a cost effective strategy in reducing homelessness However for early intervention to be effective in the case of CaLD people such intervention has to be culturally and linguistically appropriate. Much more needs to be done as current funding of specialist CaLD housing services providers has limited scope for it.

Direction 3.3: Roll out consistent, trauma informed practice across programs and services

We agree that people who are homeless experience trauma at a greater rate than the rest of the population and consistent trauma informed care is therefore essential for healing and for addressing the underlying issues that lead to people becoming homeless.

Trauma is a major issue within CaLD communities especially within the subpopulations of those who came to Australia as refugees/asylum seekers. Commonwealth funding provided to specialist agencies have been decreasing in recent years.

There is very little evidence that government funded mainstream mental health services are providing services to the CaLD community in a culturally and linguistically appropriate manner. Population based planning approach dictates that the needs and concerns of CaLD and indigenous people should be fully integrated in the planning process and not addressed as add on items. Equitable access to primary and other mental health care services will not eventuate unless there is a well-resourced Transcultural Unit within the Mental Health Commission as well as well-resourced community based multicultural mental health providers.

7 Conclusion:

The Council commends the Supporting Communities Forum, the State Homelessness Strategy Working Group and the Department of Communities for the consultations it held and the Directions paper that was drafted.

CaLD western Australians like their other tax paying counterparts are entitled to government funded services that are culturally and linguistically appropriate to their needs and this will not eventuate in this case unless the 10-Year Strategy on Homelessness reflects the views and recommendations contained in the body of this report.

Whilst we do not wish to repeat all of views and recommendations we wish to emphasise those mentioned under Direction 3.2: Implement integrated, whole-of-government responses to homelessness.

For further information about this proposal please contact Ramdas Sankaran, President ECCWA (ramdas@eccwa.org.au) or Vivienne Pillay, Executive Officer ECCWA (vivienne@eccwa.org.au)