



## Council of Social Service of New South Wales

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Dear Reform Team

Attached is the NCOSS response to the Going Home Staying Home consultation paper. If you require any further information please do not hesitate to contact myself on 02 9211 2599 ext 107 or [alison@ncoss.org.au](mailto:alison@ncoss.org.au) or Warren Gardiner, Senior Policy Officer on 02 9211 2599 ext 112 or [warren@ncoss.org.au](mailto:warren@ncoss.org.au).

Yours sincerely

Alison Peters  
Director

# **Response to the Consultation paper** ***Future directions for specialist homelessness services***



**August 2012**

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## About NCOSS

The Council of Social Service of NSW NCOSS provides independent and informed policy development, advice and review and plays a key coordination and leadership role for the non government social and community services sector in New South Wales. NCOSS works with our members, the sector, the NSW Government and its departments and other relevant agencies on current, emerging and ongoing social, systemic and operational issues.

NCOSS has a vision for a society where there is social and economic equity, based on co-operation, participation, sustainability and respect.

## Introduction

NCOSS welcomes this opportunity to respond to the Consultation paper *Future directions for specialist homelessness services*.

Over the last five years programs and plans to address homelessness, nationally and in this state, have undergone thoroughgoing review. This has included the NSW Auditor General's performance audit *Responding to Homelessness*<sup>1</sup> (May 2007); the report of the National Youth Commission<sup>2</sup> (April 2008); and the Commonwealth Green Paper<sup>3</sup> (May 2008) and White Paper<sup>4</sup> (December 2008).

Subsequently we have seen the former Supported Accommodation Assistance Program (SAAP) subsumed into the National Affordable Housing Agreement (NAHA), the signing of the COAG National Partnership Agreement on Homelessness (NPAH) and the release of the first ever NSW Homelessness Action Plan<sup>5</sup> (August 2009), something that NCOSS and the then SAAP peaks had been campaigning for since 2006<sup>6</sup>.

Given this history, it is appropriate that both the NSW Government and the sector, in partnership, give consideration to future directions for specialist homelessness services in this state.

As our Director indicated at the launch of the consultation paper, it is vital that we move forward in a spirit of partnership and in a way that values the strengths of our

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<sup>1</sup> *Responding to Homelessness*, NSW Auditor General, May 2007.

<sup>2</sup> *Australia's Homeless Youth: a report of the National Youth Commission Inquiry into Youth Homelessness*, National Youth Commission, April 2008.

<sup>3</sup> *Which Way Home? A new approach to homelessness*, May 2008.

<sup>4</sup> *The Road Home: a national approach to reducing homelessness*, Homelessness Taskforce, FaHCSIA, December 2008.

<sup>5</sup> *A Way Home: reducing homelessness in NSW, NSW Homelessness Action Plan 2009-14*, NSW Government, August 2009.

<sup>6</sup> *Call for a New South Wales Homelessness Strategy*, Homelessness NSW.ACT, the NSW Women's Refuge Movement, the Youth Accommodation Association and the NSW Council of Social Service, September 2006.

sector, including its diversity, capacity to collaborate and expertise in both service delivery and policy and program development.

NCOSS does not want to see reform as something done to the sector, rather than with us. Nor do we want to see reform that requires change of us but not of government.

For sustainable reform to occur, we need to maximize the opportunity for:

- clarity about what we are trying to do,
- clarity about the process and timeframes,
- jointly agreed change,
- shared access to the information, research and data that is being drawn upon,
- time to consult on and consider the information, and
- recognition of the sector's diversity and of the varying circumstances that apply in different locations and in responding to different client needs.

We turn now to the specific matters raised in the consultation paper.

## **Homelessness, the service system, working together and the case for reform**

NCOSS is broadly comfortable with the outline of both homelessness and the service system that is set out in the consultation paper. We note that the findings of the counting the homeless element of the 2011 Census are not yet available and that these findings, when available, will require careful consideration.

We would note, however, that both the nature of homelessness and of the service system are considered in this part of the paper without explicit consideration of geographical issues. The fact is that the nature of the homelessness population varies from region to region, as does the availability of specialist homelessness services, other specialist services, mainstream services and social housing services. (In this context availability refers to both the existence of such services as well as their capacity to assist additional clients).

The case for reform articulated in the consultation paper includes both generic (F&CS wide) and homelessness specific aspects. The homelessness specific aspects include *the level of repeat usage of services, the complex and fragmented access arrangements, clients not receiving the post-crisis support they need to sustain housing, the shortage of affordable and secure long term housing, and resource allocation dilemmas.*

The consultation paper goes on to consider possible strategies to overcome some, but not all, these problems. NCOSS has previously put forward detailed proposals to the NSW Government<sup>7</sup> to expand the supply of social and affordable housing and to

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<sup>7</sup> See our state election platform *Vote 1 Fairness in NSW* (March 2010) and our 2012-13 pre budget submission *Making NSW Number 1 for Fairness* (December 2011), both available online at [www.ncoss.org.au](http://www.ncoss.org.au) Our pre budget submission for 2013-14 is currently in preparation.

better link housing and support services, and requests that these proposals be explicitly considered in the development of the shared roadmap for reform.

NCOSS accepts that the level of repeat usage of services is a valid consideration but cautions against this being the predominant indicator of positive progress. We would also note that the Australian evidence base for what preventative measures work is currently quite poor, and that for successful models of early intervention and post-crisis support is at a relatively early stage.

## **Building blocks for reform**

This section of the consultation paper considers possible reform directions, covering a more individualized approach, streamlined access, better planning and resource allocation, quality improvement, and industry and workforce development.

NCOSS is concerned that the discussion of a *more individualized approach* appears to conflate together a number of separate reforms that need to be considered in a more logical way. In our view there are three separate reforms touched on in this part of the consultation paper that warrant consideration in their own right:

- one concerns the extent to which *the system as a whole* should be re-oriented away from crisis intervention towards greater preventative and early intervention measures: this requires detailed consideration of possible early intervention measures, and suitable auspices, balanced against the likelihood that reduced crisis accommodation options will contribute to an increase in homelessness,
- another concerns the extent to which the program guidelines for specialist homelessness services should be liberalized to enable them to provide *longer and better post-crisis support*, noting that the guidelines for the former SAAP program were fairly restrictive in this regard, and
- the third relates to the extent that clients need *post-crisis support that is more appropriately provided by other (non-SHS) support services*, such as therapeutic assistance to deal with mental health or drug and alcohol or gambling problems.

NCOSS accepts that there is a need to design an *improved access system* and associated referral and information sharing strategies. The design of such a system would need to consider links with Housing Pathways (particularly in relation to requests for both emergency accommodation and for access to private rental products) and with broader access channels for people experiencing domestic violence. NCOSS does not have a preferred proposal in mind but instead suggests that a specific working group should be established to consider the matter. The valuable work done on best practice client information sharing under the former Housing and Human Services Accord should be considered as part of this piece of work.

NCOSS supports the need for an improved *planning and resource allocation framework*. This framework must include demand and supply aspects, however defined and using whatever data sources. This has been a neglected issue in recent years, possibly because (other than for the COAG NPAH) there has been no growth

funding available to expand the supply of specialist homelessness services in this state. To that extent the current service system reflects historical funding allocation decisions.

We are aware that the Department of Family and Community Services has commissioned an external consultant to help develop a new resource allocation system. To date there has been limited engagement with the sector about this agenda. NCOSS submits that the following principles should apply to this element of the reform agenda:

- there needs to be sufficient engagement with the sector to ensure that there is shared ownership of the final system,
- the system must be public, transparent and understandable,
- the system must taken into account likely future population changes in particular regions, as detailed in the NSW Government's land use plans<sup>8</sup> and population projections,
- the system must include explicit consideration of whether the full range of service streams and types of support exist in each region, and
- development of the system should not be rushed and there should be ample opportunity for it to be road tested before formal implementation occurs.

NCOSS acknowledges that *quality improvement* must be an important part of any reform agenda. Housing Ministers are of course currently engaged in determining the shape of the proposed National Quality Framework, following feedback on the initial Discussion Paper<sup>9</sup> (February 2010) and the subsequent Options Paper<sup>10</sup> (February 2011).

During consultations on both papers, it became obvious that there would be significant resource implications from the implementation of the Framework, depending on the exact model chosen, and that the detailed arrangements made need to vary from state to state. The only public statement on the matter since the finalization of consultations on the Options Paper was that "*governments will consider the possible models once [they have been] costed*"<sup>11</sup>. Once the nature of the National Framework has been agreed, there will need to be a collaborative process with the sector to plan for its implementation in NSW.

In relation to *industry and workforce development measures*, the precise details of what is required is logically linked to the nature of the agreed reform roadmap and the National Quality Framework.

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<sup>8</sup> Including but not limited to relevant Regional Strategies (outside the metropolitan area) and Sub-regional strategies (within the metropolitan area).

<sup>9</sup> *A national quality framework to support quality services for people experiencing homelessness*, Discussion paper, Housing Ministers' Conference, February 2010.

<sup>10</sup> *A National Quality Framework to support quality services for people experiencing homelessness*, Options Paper, Housing Ministers' Conference, February 2011.

<sup>11</sup> Communique, Housing Ministers' Conference, 17 June 2011.

## **Partnering with the sector**

In the Introduction section of this submission we have referred to the need for a collaborative approach to the development and implementation of the reform agenda.

This section of the Consultation Paper largely deals with the governance and consultative structures for the reform agenda. It would have been beneficial to have listed the membership of the governance structures on the left hand side of the diagram – the Premier’s Council, the Homelessness Interagency Committee, and the FACS SHS Reform Internal Project Board.

As the development of the reform agenda proceeds it will be important to provide regular feedback on where work is up to, which particular working parties have been set up and what further opportunities there will be for the sector to make input.

## **Conclusion**

NCOSS is committed to constructive engagement in the reform process and will be making more detailed comments on aspects of the reform agenda as the opportunity arises.