

**Submission  
No 6**

## **INQUIRY INTO THE PROTOCOL FOR HOMELESS PEOPLE IN PUBLIC PLACES**

**Organisation:** Local Government NSW

**Date Received:** 25 February 2020

# **Submission to the Inquiry into the Protocol for Homeless People in Public Places**

February 2020

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## Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

LGNSW welcomes the opportunity to make a submission to the Inquiry into the Protocol for Homeless People in Public Places

This is a draft submission awaiting review by LGNSW's Board. Any amendments will be forwarded in due course.

## Background to the local government sector and homelessness

### The role of councils in addressing homelessness

While the NSW Government is ultimately responsible for housing and homelessness, councils invariably manage a large degree of rough sleeping due to responsibility for maintaining public space. Councils manage community concerns and complaints about rough sleeping, conduct outreach programs, and action safety measures such as clean-ups and syringe disposal. Council staff commonly identify rough sleepers across all types of public space including footpaths, parks, beaches, bushland, public toilets, community centres and playgrounds. Homelessness protocols developed by councils include training to ensure staff respond appropriately and with compassion.

In addition, councils work closely with a range of housing and homeless services, domestic violence agencies, police and specialist homelessness service providers that operate in their respective areas. Councils assist with case management of people at risk of becoming entrenched in public space.

### Working with councils to address homelessness

Councils are also assisting with the 2020 street count of homelessness that is being coordinated by district offices of the Department of Communities and Justice (DCJ). LGNSW was pleased to work with DCJ earlier this year to produce a fact sheet for council staff and councillors. It is important for the success of the street count that LGNSW and member councils are a key partner and are well-informed.

Another avenue in which council staff engage with homelessness policy issues is the Local Government Community Safety and Crime Prevention Network (LGCSCP) which meets quarterly to address matters common in many local government areas. At the November 2019 meeting, the LGCSCP was pleased to have DCJ as guest speakers to discuss homelessness issues and the state-wide street count. LGNSW encourages the Committee to engage with the LGCSCP. For more information about the LGCSCP, please contact the chairperson, Michelle Kramer, Community Road Safety Officer at Camden Council on [REDACTED] or [REDACTED].

### Advocacy from councils to address homelessness

As shown by the following resolutions made at the 2018 LGNSW Annual Conference, homelessness is a concern for councils, particularly the lack of crisis accommodation, affordable housing and lack of support programs.

#### 73 Griffith City Council – Affordable housing and homelessness

That Local Government NSW endorses the 'Everybody's Home Campaign' to end homelessness and provide affordable housing for all Australians.

*This issue was also raised by Tweed Shire and Shoalhaven City Councils*

*Covered by resolution 73*

#### Tweed Shire Council – Homelessness: additional social housing

That Local Government NSW lobbies the NSW Government to address as a State issue that requires a strategic targeted response across the continuum of crisis, short term and longer term solutions.

#### Shoalhaven City Council – Homelessness support programs

That the NSW Government provide greater funding, and implement support programs, to address homelessness in communities across the State.

74 Bega Valley Shire Council – Youth crisis accommodation

That Local Government NSW lobbies the Departments of Health and Housing to establish a fund for youth crisis accommodation, prioritising local government areas currently lacking any appropriate facilities to alleviate this crisis.

Again the issue of homelessness was advocated by councils at LGNSW's 2019 Annual Conference. The following resolutions call for funding from the NSW Government to support the involvement of local governments in reducing homelessness:

101 Cumberland Council – Homelessness

That Local Government NSW advocates for the NSW Government to actively lead and contribute to the implementation of initiatives to combat the homelessness crisis in NSW, including funding for local government to deliver initiatives at the local level.

*Covered by resolution 101*

Kyogle Council – Social housing stock deficits in regional NSW

That Local Government NSW calls on the NSW Government to provide funding to address social housing stock deficits in the regions, to raise regional housing stock levels up to the state average.

Forbes Shire Council – Further awareness of homelessness in rural areas

That the NSW Government recognises that homelessness is not just an urban issue, and increase funding for homelessness support in rural areas.

<p><b>Recommendation 1:</b> In recognition of the critical role councils play in addressing homelessness, that the Committee and the NSW Government constructively work with the local government sector through LGNSW, LGCSCP and councils directly.</p>
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## Background to the Protocol

The NSW Government introduced the Protocol to help ensure that people who are experiencing homelessness are treated respectfully and appropriately and are not discriminated against on the basis of their homeless status. The Protocol also aims to assist homeless people to receive services if they need or request them. In summary, the Protocol establishes that people who are homeless have the same entitlement as any member of the public to be in public spaces. Therefore, people who are homeless should not be approached unless they are placing themselves or others at risk or if they have requested assistance.

The Protocol has been endorsed by a number of NSW Government agencies. Councils are not signatories to the Protocol but many have used it as guidance in establishing their own local homelessness protocols.

## Response to the terms of reference

### Protocol framework

#### **a) Whether the Protocol continues to provide an effective framework for government organisations with an operational presence in public places and for services that support people who are experiencing homelessness.**

Feedback from councils is overwhelmingly positive about the value of the Protocol to guide interactions with people experiencing homelessness. Councils would like the Protocol to continue, albeit with some edits, as suggested in this submission.

Positive aspects that councils identified about the Protocol are that it:

- Acknowledges the rights of people who are homeless
- Highlights that people who are homeless can be from different backgrounds, genders and ages, and this can influence the appropriate response
- Is simple and succinct
- Provides a good starting point and baseline
- Guides interactions, planning, service provision and communications with people who are homeless
- Provides leverage to advocate to agencies as to how they are responding to people who are experiencing homelessness
- Can be used to inform people sleeping rough on their responsibilities when occupying public space
- Shifts the focus from a law enforcement approach to a community safety approach
- Is a rights-based framework
- Facilitates a consistent response from both government and non-government organisations.

Councils have some suggestions for how the Protocol could be improved so that it provides a more effective framework. These suggestions are as follows:

#### **i) Assertive Outreach**

A primary suggestion is that the Protocol should include an expectation for officers to conduct assertive outreach. Rough sleepers can be reluctant to accept referrals to services as previous referrals may not have assisted them or they do not trust the service. Furthermore, rough sleepers can suffer complex trauma and find it difficult to self-refer. Councils report that successful support of a person experiencing homelessness often requires intensive outreach over a period to build trust before the person will consider offers of help or housing.

The Protocol confirms the right of people experiencing homelessness to be in public space. An inadvertent outcome is that officers can use the Protocol to justify not assisting people or avoiding action. Some councils have found that the Protocol has resulted in a more passive response to people sleeping rough than a proactive one. This reiterates the need for the Protocol to encourage assertive outreach. It is recommended that the Protocol draw from the [Assertive Outreach Good Practice Guidelines](#). The Guidelines were developed by an industry partnership, funded by the NSW Department of Communities and Justice (DCJ).

**ii) Social justice principles**

The Protocol appears to support the principles of social justice, but this should be explicitly stated. These principles are *equity, rights, access and participation* of all in the community. The NSW local government sector has extended these principles as part of LGNSW's Fundamental Principles to include *recognition* of Aboriginal people and *health and safety* for all in the community. The Fundamental Principles are overarching principles on matters of importance to local government endorsed at the LGNSW Annual Conference.

**iii) The underlying issues of homelessness and strategies to address these**

The Protocol exists to guide respectful interaction between officers in state government agencies and those experiencing homelessness. This means that the Protocol does not address the causes and solutions to the issue of homelessness (and nor should it in the interests of clarity and succinctness). However the Protocol should at least refer readers to the *NSW Homelessness Strategy 2018-2023* and the *Future Directions for Social Housing in NSW* plan for an overview of the NSW Government response to the causes/solutions. It is recommended that the Protocol include reference to NSW Government actions including rough sleeper counts, assertive outreach teams, Registry Week events, and the Premier's priority to reduce homelessness.

**Recommendation 2:** The Protocol is a valuable framework which could be strengthened by recognising the:

- Importance of assertive outreach;
- Adherence to social justice principles; and
- Solutions to addressing homelessness by linking and referring to relevant state strategies.



## Implementation

### **b) The extent to which the Protocol is being implemented in practice by government organisations providing direct service delivery, and non-government organisations contracted on behalf of government.**

Whilst the Protocol establishes a sound framework, councils note that its implementation could be improved. Council officers are often a first point of contact for rough sleepers and are generally well aware of the Protocol. The Protocol could be more explicit in outlining the responsibility of other officers. For example, what types of positions in government agencies should have responsibility for overseeing the implementation of the Protocol within their agency? This would assist council officers and others to contact the correct person as necessary.

One positive identified by councils is that the NSW Government-funded Specialist Homelessness Services (SHS) have been useful for the implementation of the Protocol. The SHS program began in 2014 through the Going Home, Staying Home reform. Previously councils may have referred rough sleepers to police or to resource-poor non-government organisations. Now councils can refer to government-funded SHS to support people who are homeless or at risk of homelessness. The existence of SHS providers should be referenced in the Protocol.

**Recommendation 3:** That the Protocol be more explicit as to who is responsible for implementing the Protocol within agencies, as well as referring to government-funded SHS providers and their role.

Keys impediments to implementing the Protocol for officers is inadequate knowledge of local service providers and whether these service providers have the resources and capacity to take new referrals. For the Protocol to be effective this should be rectified by:

- Expanding the 'useful contacts' list found in the Protocol's appendix to include more outreach services and SHS providers and categorising them in their respective regions, and keeping this list updated on a regular basis as new services and providers are established
- Rolling out education and training around the Protocol to agencies and other organisations, including mental health-first aid training and cultural awareness training.
- Requiring SHS providers to have a 'Report a Rough Sleeper' portal to help account for the location of individuals sleeping rough. This helps ensure approaches to the person aren't unnecessarily duplicated, or conversely, ensures that no identified individual fails to receive a response.

**Recommendation 4:** That the Protocol will be implemented more successfully if adequate training and resources (e.g. expanded contact list and 'Report a Rough Sleeper' tools) are provided to local service providers.

For the Protocol to be implemented effectively and achieve its aim of having people experiencing homelessness treated with respect, there need to be long-term solutions to assisting the person to gain accommodation. The Protocol fails to recognise that there is a lack of appropriate support services and others are at capacity and cannot meet the growing demand. This is where the Protocol should support a Housing First model. The Housing First model prescribes safe and permanent housing as the first priority for people experiencing homelessness, driven by a guiding principle that safe and secure housing should be quickly provided prior to, and not conditional upon, addressing other health and well-being issues.

**Recommendation 5:** The Protocol must acknowledge that adequate accommodation and support services through a Housing First model are crucial in meeting the needs of people who are homeless.

## Joint responses

### **c) The appropriateness of the Protocol to support joint responses between government organisations, non-government organisations and local governments working in partnership to respond to homelessness.**

Unfortunately, the Protocol does not support joint responses to the extent that councils would hope for to best assist people experiencing homelessness. Councils have some suggestions to rectify this, as follows:

#### **i) Outline of roles and responsibilities**

It is recommended that the Protocol include a clear outline of the rights, roles and responsibilities of key government and non-government organisations, perhaps in table format for simplicity.

As the Protocol is designed to act as a guide for organisations to then create their own specific homelessness protocols, the expectations of the roles each of the key organisations should first be made clear. This will help to ensure the protocols of each respective organisation cover what is required of them to support a truly joint response to the issue of homelessness in NSW. Greater clarity on roles could be provided to police (especially regarding 'moving people on'), councils (especially regarding public space and belongings), SHS providers, health providers (especially hospitals), child protection services, as well as members of the public.

#### **ii) Addressing co-morbidity issues**

There are inadequate services available to refer individuals experiencing co-morbidity issues. That is, people with the co-occurrence of one or more disorders including drug usage and mental health issues. Often these individuals cannot qualify for crisis accommodation or other housing options while they are using illicit drugs. Further, councils have found that NSW Health Mental Health Outreach will not attend nor refer if drug use is perceived as the primary issue. If these services cannot assist in instances of complex co-morbidity, greater resources are needed for specialist mental health service providers to enact a joint response.

#### **iii) Coordination meetings**

As the Protocol is a framework for interactions between officials and people who are homeless in public places, it does not provide a framework for interactions between organisations. As such the Protocol, and its guidelines for implementation, have no reference to joint responses or any indication that the Protocol supports different organisations working in partnership to address homelessness.

Coordinated responses by agencies in addressing homelessness are often made at a local level and often without a lead organisation with the delegated authority for the response. Expectations of responsibility for coordination can then fall to local government. For example, some councils facilitate a Homelessness Working Group to address place-based homelessness issues as they occur. These meetings are attended by a range of SHS providers and non-government organisations (e.g. Wesley Mission, St Vincent de Paul, Baptist Care Community Services, Catholic Care) and other stakeholders including NSW Police, Transport for NSW, the Salvation Army, and representatives from a local chamber of commerce. Council officers attend from different council divisions representing recreation, compliance and community planning.

The Protocol could be bolstered by requiring state agencies, or leads in community-managed organisations who are funded by state bodies, to initiate coordination meetings with service providers and local government representatives.

**iv) Collective impact**

The Protocol would be strengthened by referring to the value of collective impact approaches and partnerships. Collective impact is a framework that challenges fragmented or siloed responses by highlighting the benefits of collaborative approaches. This would also position the Protocol as an underpinning position statement for the NSW Homelessness Strategy 2018-2023.

**v) Access**

Ensuring that services are centrally located together would not only better enable integrated support, it would also improve access for people who are homeless. Co-location assists in addressing the difficulties rough sleepers face when trying to access transport.

**Recommendation 6:** That the Protocol guides joint responses across organisations by:

- Including a clear outline of the roles and responsibilities of the main organisations;
- Recognising the need for specialist drug and mental health service providers;
- Advising state agencies, or SHS providers, to initiate coordination meetings;
- Referring to the value of collective impact approaches; and
- Co-locating services where possible.

## Protection of rights of people who are homeless

### **d) Whether the Protocol adequately protects the rights and interests of people who are experiencing homelessness who use public places, including Indigenous people and minority groups.**

The Protocol goes a long way to respecting the rights of people experiencing homelessness, including those from vulnerable groups. Areas for improvement include:

#### **i) Other types of rough sleeping**

The Protocol defines primary homelessness as when:

*a person lives on the street, sleeps in parks, squats in derelict buildings, or uses cars or railway carriages for temporary shelter.*

The Protocol should provide guidance on how to address people sleeping in cars which are usually privately owned but parked in public space. This also applies to other forms of primary homelessness identified by councils including sleeping in boats and caravans. Councils report a grey area surrounding Crown land and railway stations where they are not considered public property but they are public spaces. This can create loopholes such as the ban on people sleeping rough at Sydney's Central station despite RailCorp being a signatory to the Protocol.

#### **ii) Person-centred language**

The Protocol should be edited to contain person-first language, such as 'people who are experiencing homelessness', or 'people sleeping rough'. The situation that the person is in does not define their identity and homelessness can often be a transitional period.

<b>Recommendation 7:</b> That the language in the Protocol is updated to include a broader definition of sleeping rough and to use person-centred language.
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#### **iii) Infrastructure and belongings**

The Protocol states that people who are homeless have a right to 'carry with them and store their belongings'. Councils would welcome more guidance on how to manage excess belongings in public space. This could be in the form of a definition of a reasonable quantum of belongings (i.e. City of Sydney defines belongings as two suitcases and a roll of bedding). The Protocol should provide guidance around the extent of the right to store belongings in public space as this is a current grey area. Councils are also seeking further guidance on how to manage the establishment of structures by people experiencing homelessness.

While the Protocol establishes that people who are homeless have an entitlement to be in public space, in some places public infrastructure is used to move people on. Such infrastructure can include the placement of arm rests in the middle of double seats or having sloping benches to prevent people from sleeping on them. The Protocol does not provide guidance on whether this type of infrastructure in urban planning is acceptable.

The Protocol should also include provisions for how agencies can assist people who are sleeping rough during extreme weather events. One example that the Protocol could link to is the City of Sydney's emergency response protocol which was established in response to extreme storms in April 2015. The emergency response protocol seeks to coordinate and provide accommodation or appropriate shelter during severe weather events not catered for by mainstream services.

**Recommendation 8:** That the Protocol provides further guidance on an acceptable level of belongings and structures owned by the person experiencing homelessness. Guidance is also necessary for agencies on the use of public infrastructure to either dissuade people from sleeping rough or to coordinate appropriate shelter during extreme weather events.

**iv) More guidance for addressing minority groups**

Councils are seeking more guidance for how to respond to people who are homeless from minority groups. A suggestion is to include more information on responding to people with a disability, those requiring physical or mental health treatment, women, and children. The involvement of Aboriginal workers and organisations, including Local Aboriginal Land Councils, in the provision of homelessness services is strongly supported. The Protocol should suggest Culturally and Linguistically Diverse (CALD) competency and awareness training for officials, as well as training on how to use the national Translating and Interpreting Service (TIS). The number and logo (recognised interpreter symbol) for TIS should be included on the Protocol's contact list with a quick how to use guide.

The Protocol states that members of the public can report children under the age 16 to the Child Protection Helpline, and those aged 16 to 17 with their consent. However, this would require approaching the child to confirm their age, and councils would welcome clarification on how this is best undertaken. Additionally, while the Protocol references LawAccess NSW in its appendix, it would be valuable to see more information relating to the legal needs of homeless people in the Protocol itself (including with respect to family law, domestic violence, general debt and housing related legal issues).

**v) Guidelines to assist non-residents**

People experiencing homelessness who are not Australian residents do not qualify for government health, housing and welfare. Non-residents may not have the support of family or friends either. This increases the likelihood that non-residents sleep rough, particularly if they cannot afford a return flight to their country of citizenship. The Protocol identifies that people who are new arrivals in Australia may have cultural or language barriers to accepting assistance, but it does not address the problem of the lack of services available to cater to non-residents. The list of contacts in the Protocol should include any services that can assist non-residents.

**Recommendation 9:** That the Protocol addresses the needs of a broader range of minority groups and clarifies their legal rights.

## Balancing the rights of residents, businesses and users of public space

### **e) Whether the Protocol appropriately balances the rights and interests of people who are experiencing homelessness with those of residents, businesses and other people and organisations using public places.**

The rights of people experiencing homelessness, and the ways to respond, should be better communicated to the public. Community and businesses are frequently of the view that a council officer can issue an order to remove a rough sleeper. However, councils do not have this authority. In these cases, the Protocol has been used by councils to educate members of the community but further media resources would be useful.

The responses from members of the community to people experiencing homelessness can vary from that of compassion to those who wish to make complaints. This places a pressure on local government to act in a variety of ways to address these different opinions, as explored below.

#### **i) Addressing economic and safety concerns**

Community members can have a preconceived notion of what homeless people 'look-like' and this can lead to stigmatisation of groups of people. There are cases where members of the public have reported rough sleepers to council, but when further investigated it was determined that the people did in fact have accommodation but were choosing to socialise or rest in public space. This is where information on how to identify a person sleeping rough would be useful, or tools such as "Report a Rough Sleeper" could be used so that officers can log a note to prevent further unnecessary approaches to these individuals.

The Protocol should recognise the real-life situations that organisations may need to respond to when balancing the rights of everyone in the community. Businesses and members of the public may report people sleeping across doorways of public buildings or poor hygiene issues for example. It can be difficult for councils to resolve these common concerns while strictly following the Protocol which restricts intervention.

From the perspective of a local business or resident, it would be good to include, at the very least, case studies or examples of appropriate steps to resolve complaints directed at a person experiencing homelessness. For example, if they are sleeping outside a small business or spending significant time in front of a residence. Further detail and instruction is required for these circumstances, which can be of use not only to businesses and residents, but also councils, police and railway staff.

A key challenge for councils is when there have been instances of people who are homeless behaving in a way that has brought them into conflict with the wider community, but which may not constitute criminal or anti-social behaviour. Therefore, the Protocol should provide greater clarity regarding the circumstances under which rough sleepers can be approached.

Councils often receive complaints from local ratepayers and businesses about people sleeping rough in popular locations, including tourist areas, which can have an impact on business patronage. The Protocol could suggest the right for government agencies and councils to move people on after they have been given adequate time and alternative accommodation options.

**Recommendation 10:** The Protocol should include practical advice for organisations on when they can approach people sleeping rough to resolve issues of common concern to ratepayers, including loitering and hygiene issues. This should be accompanied by a public education campaign about ways to respectfully respond to homelessness.

**ii) Channelling compassionate approaches**

There is also another view in the community that help should be provided to people who are sleeping rough, and also to their companion animals. Council staff have found that it is often not easy to find assistance due to the low level of resourcing, and particularly short and longer term housing and case management providers.

In the absence of appropriate services, well-intentioned members of the public or charities may try to provide assistance to homeless people, but they may engage in an unsafe manner or enable homelessness, rather than addressing needs through a Housing First approach. Unsafe practices can include going to rough sleeper hotspots after dark, not providing adequate (if any) training or support to their volunteers, not undertaking sufficient background checks on their volunteers (e.g. Working With Children Checks), providing homeless people with goods (such as blankets and doonas which are then discarded) and either not referring people to the appropriate services or trying to undertake case management themselves. The Protocol could include examples of appropriate responses for those who wish to help.

**Recommendation 11:** That Specialist Homelessness Services are adequately funded, and this is communicated to the public, so that concerned individuals know how they can best assist.

## Any other related matters

A multitude of challenges to addressing homelessness sit outside the scope of the Protocol. As mentioned earlier in this submission, councils report that one of the main problems in addressing homelessness is the lack of social and affordable housing and other types of crisis/transitional accommodation. In addition to the shortage of accommodation, the NSW Government should address deficiencies in the following services:

- **Post crisis support:** adequate post-crisis support for people once they move into accommodation needs to be provided in order to prevent their return to homelessness.
- **The Housing Outreach Support Team (HOST):** HOST has been very effective in assisting rough sleepers, however it is now spread more thinly across a larger number of local government areas in Sydney without any corresponding increase in staffing. Furthermore, the planned expansion of assertive outreach to other parts of NSW should not be funded through cuts to the original HOST team in Sydney. While the focus on long term homelessness is welcomed, people who have only recently found themselves on the street also need attention. HOST's criteria and resourcing should be expanded to enable it to assist these people before their circumstances deteriorate and their homelessness becomes entrenched.
- **Non-street homelessness:** While local government welcomes the commitment of the Premier's Priority to halve rough sleeping by 2025, other forms of homelessness (secondary and tertiary homelessness) account for the majority of homelessness, and also requires additional resourcing. These more hidden forms of homelessness may include couch surfing with friends or relatives, or staying in unstable and insecure accommodation such as emergency shelters or boarding houses. People living with this uncertain accommodation include women, children and young people, including those escaping family and domestic violence.

## Prevention

The underlying drivers of homelessness must be addressed by government at the same time as taking steps to reduce rough sleeping. The range of drivers include many factors such as drug, alcohol and gambling addiction; mental illness; family breakdown; shortage of stable and affordable housing; financial or housing stress; health issues; long term unemployment; family and domestic violence; loss of social and family networks; and people leaving healthcare services, child protection and correctional facilities without long term housing arrangements in place.

**Recommendation 12:** That a holistic approach is taken by the Committee and the NSW Government to address homelessness by ensuring that the Protocol is adequately complemented by proactive outreach and post crisis support, and ideally, prevention.



## Recommendations

In summary, LGNSW makes the following recommendations:

### **Recommendation 1:**

In recognition of the critical role councils play in addressing homelessness, that the Committee and the NSW Government constructively work with the local government sector through LGNSW, LGCSCP and councils directly.

### **Recommendation 2:**

The Protocol is a valuable framework which could be strengthened by recognising the:

- Importance of assertive outreach;
- Adherence to social justice principles; and
- Solutions to addressing homelessness by linking and referring to relevant state strategies.

### **Recommendation 3:**

That the Protocol be more explicit as to who is responsible for implementing the Protocol within agencies, as well as referring to the Government-funded SHS providers and their role.

### **Recommendation 4:**

That the Protocol will be implemented more successfully if adequate training and resources (e.g. expanded contact list and 'Report a Rough Sleeper' tools) are provided to local service providers.

### **Recommendation 5:**

The Protocol must acknowledge that adequate accommodation and support services through a Housing First model are crucial in meeting the needs of people who are homeless.

### **Recommendation 6:**

That the Protocol guides joint responses across organisations by:

- Including a clear outline of the roles and responsibilities of the main organisations;
- Recognising the need for specialist drug and mental health service providers;
- Advising state agencies, or SHS providers, to initiate coordination meetings;
- Referring to the value of collective impact approaches; and
- Co-locating services where possible.

### **Recommendation 7:**

That the language in the Protocol is updated to include a broader definition of sleeping rough and to use person-centred language.

### **Recommendation 8:**

That the Protocol provides further guidance on an acceptable level of belongings and structures owned by the person experiencing homelessness. Guidance is also necessary for agencies on the use of public infrastructure to either dissuade people from sleeping rough or to coordinate appropriate shelter during extreme weather events.

### **Recommendation 9:**

That the Protocol addresses the needs of a broader range of minority groups and clarifies their legal rights.

**Recommendation 10:**

The Protocol should include practical advice for organisations to resolve issues of common concern to ratepayers, including loitering and hygiene issues. This should be accompanied by a public education campaign about ways to respectfully respond to homelessness.

**Recommendation 11:**

That Specialist Homelessness Services are adequately funded, and this is communicated to the public, so that concerned individuals know how they can best assist.

**Recommendation 12:**

That a holistic approach is taken by the Committee and the NSW Government to address homelessness by ensuring that the Protocol is adequately complemented by proactive outreach and post crisis support, and ideally, prevention.

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LGNSW would welcome the opportunity to assist with further information during this review to ensure the views of local government are considered.

To discuss this submission further, please contact LGNSW Senior Policy Officer at [REDACTED] or on [REDACTED].