



Submission in response to the NSW Government's Homelessness Strategic Framework: Stage 1 Draft Consultation Paper, August 2008

**City of Sydney
September 2008**

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THE CITY OF SYDNEY

The City of Sydney, through service provision, project, policy and sector development, research and advocacy, aims to end chronic homelessness within the inner city by 2017 (Homelessness Strategy 2007-12, endorsed by Council in August 2007) .

The City of Sydney is the only Local Council in Australia with a dedicated Homelessness Unit and an annual investment in direct homelessness projects and policy of over 1.7 million dollars. The City currently partners with the NSW state government on several major and innovative homelessness initiatives:

- The Homeless Persons Information Centre
- The YWCA Homeless Brokerage Program
- The Inner-City Homelessness Outreach and Support Service
- The Inner Sydney Chronically Homeless and Complex Needs Coordination Project
- The Inner-City Homelessness Action Plan II

Through its programs, projects and the data we collect, the City of Sydney is able to implement targeted, local strategies for reducing homelessness. We are well positioned to contribute in the development of Homelessness policy in NSW and importantly, to play a key role in its implementation.

The City particularly welcomes the opportunity to consider any approaches that combine and coordinate the resources and the commitment of all levels of government. We believe any approach that aims to significantly impact upon the levels of homelessness at Federal, State and Local levels must do this within a framework that integrates policy across all layers of government.

We further believe, where social integration and cohesion is conjoined to goals of reducing homelessness that policy development should also incorporate partnerships with community services, the business and philanthropic sector, the homeless themselves and the community as a whole.

The City welcomes the development of the NSW Strategic Framework on Homelessness. We applaud the State Government for its response to the recommendations of the NSW Auditor-General's performance audit 'Responding to Homelessness' and the commitment to addressing homelessness that is clearly evident in the development of this Framework.

RESPONSE TO STAGE 1, DRAFT CONSULTATION PAPER

In responding to Stage 1, the Draft Consultation Paper, the City acknowledges that the Consultation Paper is the first step in a two-pronged process that will be completed after the release of the Federal Government's White Paper on Homelessness in October 2008.

For this reason the City's response to Stage 1 has not attempted to address the individual strategies and attached actions outlined in the Consultation Paper but will focus on the broader aspects of the document.

1. Overarching outcomes

In the Introduction to the Consultation Paper, the State Government has identified two overarching **outcomes**:

1. that less people will become homeless
2. that less people who have been or are homeless become homeless again.

Less clear in the Paper is what the **overall goals** that will guide the development of the Strategic Framework are. Although reducing the *rate* and impact of homelessness is mentioned it is not explicit as a goal.

The focus of the two identified outcomes is essentially the *prevention* of homelessness either in the initial instance or as a repeated experience. This is commendable and essential if we are to close the entry points into homelessness. However, the absence of a goal to increase exit points out of homelessness is a shortfall and we urge the government to address this in the final draft of the Framework.

There is an important distinction to be made between the goal of reducing the *rate* of homelessness and one that aims to reduce the *levels* of, or actual homelessness. Whilst the two can and should co-exist, one should not exclude the other people who are homeless amongst the 27,374 that were counted in 2006 in NSW (ABS Census). These are complementary not divergent goals.

In line with the City's Homelessness Strategy and in recognition of the Federal Government's statement that *reducing* homelessness is everyone's responsibility (Green Paper) the City proposes the following goals:

Recommendation: that the Framework clearly articulate a vision of ending chronic homelessness and reducing overall homelessness.

2. Overall Strategic directions

The State Government has identified three Strategic Directions, under which a range of strategies and actions fall, to prevent new and repeated experiences of homelessness.

1. Prevention and Early Intervention
2. Assessment and Crisis Response
3. Longer Term Accommodation and Community Support

The City recommends an approach that aims to end homelessness instead of 'managing' crisis. This will require a profound change in policy and focus from 'shelter first' to 'housing first'; from crisis responses to a focus on prevention, quick response and solution. For this reason we recommend the following additions and amendments to the identified strategic directions:

1. Prevention and early intervention include a policy of zero tolerance of discharges to homelessness from justice and health institutions and from state care. The practice of extending a person's stay in homelessness through repetitive referrals across the primary, secondary and tertiary levels of homeless must end.
2. Assessment and crisis response be amended to *quick* assessment and *rapid* responses that aim to assist people to access the most appropriate services quickly with a focus on facilitating rapid exits from homelessness.

3. Longer term accommodation and community support be amended to articulate a plan for *long term* accommodation and secure housing attached to the provision of long-term, individualized services and supports to those who remain vulnerable to homelessness.

The distinction between long term and longer term accommodation is important. The former would suggest an enduring outcome whilst the latter may simply act to extend a person's stay in crisis and medium term accommodation, i.e. secondary homelessness. The individualisation of support is also necessary to ensure that support is matched to need rather than provided generically.

Recommendation: that the three strategic directions focus on early intervention and prevention, quick response and rapid exits from homelessness and long term accommodation with individualised support.

3. Homelessness (services and programs) in NSW

In the section on Homelessness in NSW the government has given context to the Framework by providing a list of services and programs that currently exist to meet the needs of people who are homeless in NSW.

We note that some of the programs identified will reach the end of their funding in the next 12 months, e.g. the Integrated Services Project and the Kings Cross Youth at Risk Initiative, despite evidence of strong outcomes. We suggest that the government recognise best practice with recurrent funding when programs can demonstrate sustainable, enduring outcomes. This would provide service providers and their auspice bodies with the incentive to focus on sustainable outcomes rather than the limited occasions of service such as those that dominate service provision in NSW.

Related to this issue is the tendency to fund time limited 'pilot programs' as a means of responding to systemic issues that are endemic across the sector. The proliferation of pilot programs for people with dual diagnosis is evidence of this. Whilst many of these pilot projects have achieved excellent results, the service system as a whole has changed little despite over two decades of research and pilot studies. On any given day, people with dual diagnosis still struggle to access effective services that meet all of their needs.

Issues such as the challenge of responding to people with dual diagnosis will remain challenging until there is a universal move away from approaches that don't work toward ones that do. When viewed longitudinally, the failure of the service system to learn and adapt from the lessons of these projects, creating the need to fund new ones, makes even the most successful, cost effective projects expensive.

Recommendation: that the government adopt a policy of recurrent funding for programs that are demonstrating successful outcomes particularly where those outcomes support the stated aims of the NSW Framework.

Recommendation: that the government implements structural change to resolve systemic issues rather than the use of time limited, project based responses.

We also note that a number of the programs in this section of the Consultation Paper are provided by mainstream government agencies that do not provide core homelessness services and have peripheral involvement with homelessness only, e.g. many of those provided or funded by DADHC.

The Consultation Paper fails to simultaneously address the underlying, enduring systemic issues that present barriers to many homeless individuals' ability to access those programs. Mainstream agencies tend to adhere to specialized service mandates, which often restrict their ability to address the needs of clients where those needs do not easily fit within the parameters of those mandates. Issues such as restrictive eligibility criteria, the existence of service silos leading to service devolvement, the lack of coordination leading to ad-hoc occasions of service all result in a reality that compounds disadvantage and perpetuates homelessness for many.

People who have multiple and complex needs, axis II mental disorders, cognitive impairment and who are frail but not aged are all examples of the victims who are left without an effective service response as a result of restrictive criteria. Many of this group are frequent flyers through the expensive areas of justice and health and are using substantial resources with little evidence of outcomes.

Compounding and perhaps contributing to this issue is the fact that both mainstream and non-government services rarely perform systematic, post-service or post-referral client follow-up. As a result, reliable methods for determining the effectiveness of services and referrals, or evidence of outcomes do not exist in most services.

The mainstream service system in NSW is the primary source of services and supports in the areas of addictions, mental health, primary health, ageing and disability services and justice responses. Given the expense of providing these services, particularly where these services are provided repeatedly, the City urges the government to embark upon research that will measure the costs of providing these and other welfare services against the cost of providing long term accommodation with support. Research that investigates and analyses the cost of providing services against outcomes achieved is the best way for the government to determine how to allocate their finite resources toward enduring outcomes.

The City supports the inclusion of mainstream programs in the Framework and recognises the importance of their role in achieving its stated aims. However, without addressing accessibility and data collection, the full realization of a meaningful role for these programs in the Strategic Framework is unrealistic. Without underlying research to assist the government to allocate resources toward programs that work and away from ones that don't, it might be argued that a successful Framework will not be affordable.

Recommendation: that the government adopts a plan to increase the accessibility of mainstream services for a broader segment of the homeless population.

Recommendation: the creation of an integrated system for the collection and management of homelessness data that is embedded in all mainstream services

Recommendation: that the government undertakes cost/benefit research to determine the best way to allocate its finite resources

4. A NSW Homelessness Strategic Framework - Overview

4.1 The role of Local Government

The City has a dedicated Homelessness Unit and invests significantly more than any other local council on this issue and we acknowledge that this makes the City of Sydney unique amongst local councils. However, all local councils have a responsibility to respond to the needs of

communities in their local government areas. This includes people who are homeless and the impact of homelessness on local communities.

The Commonwealth and State governments have legislative responsibility and the primary role of funding and providing services to people who are homeless. The role of local government, although different, is complementary to Commonwealth and State responsibility. Local governments have an essential role to play in the development of communities in their areas and they also resource community service providers to do the same. Local Councils also bear many of the financial and social impacts of homelessness at a local level and respond directly to those impacts.

Joined up government policy, by definition, should traverse all three layers of government. Local Councils have a unique opportunity to drive and/or participate in local responses to homelessness yet they are a significantly under utilised resource in homelessness planning. Local government is well placed to work at the grass roots level with local communities including service providers, residents, businesses and the homeless themselves, whilst also working at the policy level with our state and federal counterparts. This places us in a unique position to ensure that high level policy is understood, adapted and promoted at a grass roots level.

Recommendation: that the government utilise the opportunity presented by the development of the Strategic Framework to recognise and promote the role and opportunity of local councils in responding to homelessness and develop a plan to work with them.

5. Underpinning Principles

The State Government has identified only two underpinning principles in the Consultation Paper:

- Coordination
- Building the evidence base, including data collection

The City believes that these underpinning principles are limited in their scope and need to be expanded to express a more inclusive philosophy that reflects a new direction and renewed commitment in NSW to homelessness service planning and provision.

See below for the principles recommended to the Federal Government in our submission to the White Paper on Homelessness. These principles reflect the Federal Government's own stated principles and we believe that they should apply across all layers of government.

1. ***A national commitment***, reflected in dedicated leadership and the active involvement of all levels of government and from the not for profit, business and philanthropic sectors is necessary to end homelessness.
2. ***The integration of service delivery*** across all public service areas will require joined up policy that is longitudinal, evidence based and measures outcomes over the short and long term.
3. ***International principles of human rights*** that focus on social inclusion, the right to adequate housing, safety, well-being, dignity and respect for all underpins all identified approaches. All people, regardless of their circumstances have the right to access resources that will help them to end their experience of disadvantage.
4. ***The primacy of individual choice and the right to participate*** is paramount in all approaches.

5. **Every vulnerable person who requires assistance** to address the issues that are contributing to their homelessness, should be able to access support that specifically addresses those needs.
6. **Prevention and early intervention** facilitating rapid exits from homelessness is a main focus and transition points from homelessness and institutional care into long term housing rather than limited term shelter is a priority.
7. **Ending the experience and reducing the cost of chronic homelessness**, that is housing people who have been homeless for one or more years, is a focus.
8. **The use of comprehensive and consistent data** and the use of evidence based approaches will help shape our priorities for action.
9. **Targets, that are measurable and measured**, are set to end homelessness, attached to longitudinal planning with adequate resources attached.
10. **The discontinuation of approaches that are proven to be unsuccessful** in ending the experience of homelessness for service users and the expansion and ongoing resourcing of proven approaches will underlie our planning.

Recommendation: that the government adopts these 10 principles to underpin the development of the NSW Strategic Framework on Homelessness.

6. Strategic Directions (Strategies and Actions)

6.1 A summary of this section

The state government has already received feedback about the issues that the sector has with the language used in the Consultation Paper, as witnessed during the consultation on the 3rd of September that the City participated in. In particular the lack of specific strategies focused on outcomes and the overly bureaucratic and repetitive language as evidenced in the proliferation of words such as 'develop', 'improve', 'identify', 'enhance' etc.

In addition to the issue of the language used the City is also concerned that this section of the Consultation Paper, arguably the most important section, reads like a service manifest rather than an actual strategy. It is noted that the eventual document has been called a 'Framework' and not a 'Strategy' however the Framework encloses strategies making this an important point.

The strategies and their corresponding actions appear more concerned with planning to plan than with the articulation of a road map toward concrete outcomes. A failure to articulate its goals or to be clear about outcomes with a corresponding plan for achieving them would present a risk to the NSW Government that the Framework will not achieve its stated aims let alone the goal of ending chronic homelessness that the City has recommended for adoption.

Recommendation: that the government articulate outcome focused strategies that are distinct within each of the Strategic Directions.

It is also appears that the government has taken what already exists in the service framework in NSW and attempted to fit that into its Strategic Directions without assessing the efficacy of those programs in direct relation to the over arching outcomes or Strategic Directions.

The homelessness service system that currently exists in NSW is predominantly geared toward crisis and medium term responses. The draft Strategic Framework is focused on prevention. It does not make sense that the government has now placed the existing service system in a framework of prevention without any evidence of a review or a reconstitution of existing services.

We understand that the NSW government will finalise the Strategic Framework once the Federal Government has released its White Paper on Homelessness and the final outcome will depend on the content of that policy. However, we also believe that an assessment of the capacity of existing programs to achieve desired outcomes is necessary irrespective of the content of federal policy. A review would include an assessment of potential areas where it may be necessary to restructure programs or program criteria and a review of funding priorities.

Recommendation: that the government review existing programs and assess their ability to achieve the stated outcomes of the Framework.

Recommendation: that the government prepares to restructure programs that will not achieve those outcomes and/or reallocate resources towards ones that do.

6.2 Overall Strategic Directions

In the section below the City has responded to the summaries of the three overall Strategic Directions rather than individual strategies and actions. This response is provided in the context of our own recommended changes and amendments as outlined in section 2 of this submission. These are our proposals which respond to and build on the consultation paper.

STRATEGIC DIRECTION 1: Prevention and Early Intervention including zero tolerance of discharges to homelessness.

Target Group: people who are at risk of homelessness and people exiting institutional care.

Aim: that people at risk of homelessness never become homeless and that people exiting state care, prison and hospitals are not discharged into homelessness.

How: the identification of specific early intervention and prevention targets within the objectives of existing programs or the creation of new dedicated programs; instilling discharge planning protocols within institutions and linking external programs for providing secure long term accommodation and ongoing support directly to those programs; expansion of the Staying Home Leaving Violence program including its extension to other at risk groups such as people in housing stress; development of a system for early identification of persons at risk of homelessness and in housing stress; the inclusion of external partners in the private sector (e.g. real estate agents; community legal centres) in planning initiatives; short term financial assistance; tenant landlord mediation services; access to subsidies, such as vouchers, for households with extremely low incomes; coordination with service providers to ensure that a homeless person's service needs are met once he or she is in permanent housing; periodic follow-up work to prevent a housing crisis; services to address credit problems and poor financial literacy.

STRATEGIC DIRECTION 2: quick assessment and rapid responses that link people to the most appropriate services quickly with a focus on facilitating rapid exit from homelessness.

Target Group: people who have recently become homeless

Aim: that people who have just entered the cycle of homelessness will be assisted to exit homelessness within three months and before developing an identity as homeless. That people who exit institutions and fall back into homelessness are quickly assessed and referred to long term accommodation with support attached to reintegrate and rehabilitate.

How: crisis services will be provided with streamlined access to long term and secure housing; where housing is available, housing providers have responsibility to process applications within the three month time frame where eligibility criteria is met; housing providers work collaboratively with service advocates to resolve barriers; dedicated staff develop knowledge of local housing markets and relationships with landlords; ongoing marketing and outreach to landlords; incentives for landlords to rent to homeless households; assurances to landlords that the support services will assist with landlord/tenant problems; establishment of support systems and incentives for landlords to increase likelihood of renting to 'high risk' persons; referral services such as the Homeless Persons Information Centre, the Youth Accommodation Line and the DV line are used as triage points to refer people to the most appropriate service that can act to refer a person quickly out of homelessness.

STRATEGIC DIRECTION 3: long term accommodation and secure housing with appropriate wrap around support provided to ensure permanent exits from homelessness

Target Group: the chronically homeless with complex needs, rough sleepers and other people exiting homelessness

Aim: to exit people straight from the street to long term accommodation with the appropriate support to maintain that accommodation. That once exited, people are assisted to reintegrate, reach their goals and receive the support that they need to stay exited from homelessness.

How: the provision of housing linked to coordinated support; increase in coordination between services for people with complex needs; straight from street to home approach; partnerships with the private sector; investment in home support; coordinated multidisciplinary teams; reduction in the existence of service silos and service devolvement; incentives to encourage greater investment by the private sector; all layers of government cooperate in the development of affordable housing initiatives.

Recommendation: that the government adopts the specific language and outcome focused actions identified above as a road map toward the achievement of the aims of the Strategic Framework

Access to mainstream services is an identified goal of the State and Federal government. Following on from our comments earlier in this submission regarding mainstreaming of services and resolving systemic issues the City recommends a 4th Strategic Direction be incorporated into Stage 2, the final version of the Strategic Framework.

In addition we have also recommended a 5th Strategic Direction that focuses on developing a clear plan to bring all layers of government, federal, state and local to the planning table.

6.3 Additional, recommended Strategic Directions

STRATEGIC DIRECTION 4: resolve access barriers to mainstream services, improve outcomes and reduce repeat occasions of service.

Target Group: people at risk of, or who are homeless

Aim: to eliminate barriers to service access and the embedding of a principle of 'service for all' in mainstream programs; that all people who require assistance will receive a service that is matched to need.

How: Homelessness persons/teams/units are established in mainstream agencies but located in the community and provided via an outreach approach; multi-disciplinary, assertive outreach teams; development of internal plans in each mainstream service that are linked to the Strategic Framework; utilising the results of cost/benefit research to identify sources of funding, resources are directed away from programs that do not work to programs that do; eligibility criteria is reviewed to ensure that it does not compound disadvantage; collaborative approaches that share resources across program areas; a focus on service provision that is provided along a continuum of need targeted at long term outcomes and not as a limited occasion of service.

STRATEGIC DIRECTION 5: Ensuring that different layers of policy and strategy across Federal, State and Local Government strategies are integrated and complementary to the goal of ending chronic homelessness and reducing overall homelessness.

Target Group: Federal, state and local government(s).

Aim: to bring all layers of government together at the planning table to ensure that implementation of various plans is linked and that resources are allocated in the most efficient manner to maximise upon outcomes.

How: bi-annual meetings between representatives from each layer of government which report back on ongoing implementation and discuss issues, resources etc; local governments could be represented through mechanisms such as the Council of Capital City Lord Mayors;

Recommendation: that the government includes a Strategic Direction that focuses on improving access to mainstream services by addressing systemic failures.

Recommendation: that the government includes a Strategic Direction that aims to bring all layers of government policy together in a joined up approach.

7. Accountability & Performance Measures

The City acknowledges that work is yet to be undertaken on effective and across government data collection and on the attachment of performance measures to strategies and actions within the Framework. We support this process.

Government and non-government organisations that provide services to the homeless produce accountability documents (e.g. annual reports and their own versions of data collection). However, without methods of following up clients and tracking their movement through the system of services and supports, these organisations are limited in their ability to measure their effectiveness and implement change in ways that will be most meaningful for the homeless. The Strategic Framework should therefore ensure that both government and non-government services are accountable for the outcomes of services provided to their homeless clients, and should further ensure that those outcomes are used to strengthen their ability to achieve the stated outcomes of the Framework.

8. Governance

In the past, the absence of a fully articulated strategy to address homelessness in NSW has made the governance of homelessness funding and initiatives very difficult and has resulted in a system that lacks accountability for the achievement of outcomes or any meaningful impact on the numbers of people who are homeless in NSW.

The existence of the Partnership Against Homelessness (PAH) is widely known in the sector but very little is understood about its role and function. The PAH is widely considered to be disconnected to what happens at the coal face of service delivery and is therefore deemed by many to be poorly equipped to govern this issue in NSW.

In the Consultation Paper the government has proposed the following lines of accountability to oversee the implementation of the Strategic Framework on Homelessness:

- Cabinet Committee on Human Services and Justice: will monitor the Framework
- Human Services and Justice Chief Executive Officers Forum: will report to the Cabinet Committee
- Partnership Against Homelessness: forum for implementation
- Partnership Action Resource Group (PARG): will provide consultation for the PAH

The Consultation Paper does not identify or recognise the existence of the Inner Sydney Homelessness Action Committee (ISHAC) which currently oversees the implementation of the Inner-City Homelessness Action Plan (ICHAP II). Although this is a local initiative for the inner-city only, it must be assumed that the ISHAC, in the inner-city at least, will add further layers to the proposed governance of the Framework.

The City has viewed the proposed governance structure for the Strategic Framework with a good deal of concern for the following reasons:

- The more layers of governance, reporting, discussion etc that information has to travel before it reaches its destination, the more diluted and disconnected from its origins that information will become.
- There are five possible layers of reporting, planning and action committees and yet none of them has a direct connection with the grass roots service providers.
- There is no mechanism for collecting and incorporating feedback from people who are homeless.
- There is little representation from the Federal Government and no representation at all from local government identified in the governance framework.
- The identified governance framework does not acknowledge or address the existing challenges that those bodies face relating to: accountability; transparency; connectedness to actual service provision; responsiveness and flexibility in responding to systemic issues; and ultimately, the achievement of enduring outcomes.

It is the City's experience, through our frequent and direct contact with the service providers at the grass roots level, that the service sector has little faith in what happens at the higher echelons of the existing governance framework. Very little information moves between these groups in either direction. This does not create an environment where policy is responsive to or even manifests what is actually happening on the ground.

The majority of coal face staff in the service sector would be unaware of many of the programs that are listed in the Consultation Paper and the government needs to act upon that as a matter of urgency if those programs are to be fully utilised.

If the NSW government is serious about joined up policy, the governance framework must include oversight of the linkages and cooperation between state government and the service sector and between the state government and other layers of government. This is necessary to ensure that all plans are complementary and cooperative.

The City urges the government to simplify the top heavy governance framework that is proposed in the Consultation Paper and implement in its place a system of governance that facilitates a connection between the experience of service delivery on the ground to the development of policy at the top and is accountable to that.

We further recommend that ultimate responsibility for the implementation of the Strategic Framework should rest with the Premiers Department as a means of breaking down inter-government silos and ensuring full cooperation and investment in the success of the Framework across all state departments.

Recommendation: that the governance framework be simplified to facilitate a direct connection between service delivery and policy making.

Recommendation: that overall responsibility for the implementation and success of the Framework be placed directly within the Premiers Department.

9. Time frame

It is a limitation of the Paper that it fails to ascribe any timeframes or resources to any of the actions identified within. The identification of a time frame is essential. In support of a vision to end homelessness, the City recommends the development of a **10-Year Plan** for NSW that will pull together the many aspects of dedicated and mainstream approaches to homelessness and will link to Federal policy in one coordinated strategy to eliminate homelessness in this country.

Recommendation: that the Strategic Framework be constituted as a 10 year plan with the overarching goal of ending the experience of homelessness in NSW.