

Standing Committee on Estimates  
and Financial Operations  
Legislative Council  
Parliament House  
4 Harvest Terrace  
West Perth WA 6005



To the Standing Committee on Estimates and Financial Operations,

**SUBMISSION TO THE INQUIRY INTO THE FINANCIAL ADMINISTRATION OF HOMELESSNESS  
SERVICES IN WESTERN AUSTRALIA**

The Youth Affairs Council of WA (YACWA) welcomes the opportunity to provide a submission to the Standing Committee on Estimates and Financial Operations' Inquiry into the Financial Administration of Homelessness Services in Western Australia.

This submission is intended to highlight some of the key issues that are currently impacting funding and service delivery in the youth homelessness sector in Western Australia, provide an assessment of current strategic reform's progress in facilitating improvements to services for young people experiencing homelessness, and provide a series of recommendations to assist the State Government to achieve the objective of ending youth homelessness. It will also cover key interrelated issues such as social and affordable housing supply, the inaccessible nature of the rental market for low-income young people and the need for improved data-collection systems that more accurately capture the true scope of youth homelessness.

YACWA has been broadly supportive of the State Government's approach to tackling system reform in the homelessness service system that has taken shape over the past couple of years. In recognition of this however we are yet to see this fully translate into decisive investment into initiatives addressing the needs of young people experiencing homelessness when compared to other investment in broader priority areas. The State Government's 'All Paths Lead to a Home: Western Australia's 10-Year Strategy on Homelessness 2020-2030' (the State Homelessness Strategy) has several ambitious priority areas for action such as the Housing First Homelessness Initiative and Common Ground Model which, whilst welcome, have been built as comprehensive services for all clients, whilst largely being managed and delivered by adult-focused homelessness services, with limited support by youth specialist services.

International and state-based evidence shows that efforts to incorporate young people into general policy design and service delivery have minimal effect when compared to a dedicated approach. If we want to end chronic homelessness in Western Australia, we must prioritise addressing the pathways that cause homelessness and prevent those at-risk from becoming future generations of entrenched rough sleepers. In order to do this we must acknowledge the unique needs of different cohorts of young people and develop a distinct strategic approach to addressing the complex pathways that lead to youth homelessness.

It is important to state that YACWA and the youth sector more broadly have been supportive the work the State Government has done so far and acknowledge the Department of Communities' willingness to engage with YACWA and key youth homelessness services on this issue at the Youth Homelessness

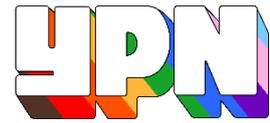
Roundtable in November last year. Nonetheless there are considerable improvements to strategic approaches to youth homelessness that must be made and we urge the Committee to recommend a significant re-prioritisation of the Strategy to focus on strong investment into existing and new initiatives to address youth homelessness in order to eliminate chronic rough sleeping in future generations of Western Australians.

We look forward to seeing the final report tabled by the Committee and are available to answer any questions about the submission and give further evidence if required.

Yours sincerely,

Sandy McKiernan  
Chief Executive Officer  
The Youth Affairs Council of Western Australia.

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To the Standing Committee on Estimates and Financial Operations,

**SUBMISSION TO THE INQUIRY INTO THE FINANCIAL ADMINISTRATION OF HOMELESSNESS  
SERVICES IN WESTERN AUSTRALIA**

We write to you as leaders of the Youth Pride Network (YPN) as co-contributors to this submission to the Inquiry into the Financial Administration of Homelessness Services in WA. YPN is Australia's first youth-led LGBTIQ+ advocacy body with a membership of over 300 young people across Western Australia.

The existing lack of support, funding and strategic reform for LGBTIQ+ inclusive youth homelessness services have been a crucial factor in poor outcomes for LGBTIQ+ young people accessing these services and associated supports. While YPN welcomes The State Government's 10 Year Strategy on Homelessness, it fails to provide strategic focus for LGBTIQ+ young people in the homelessness system despite making up a significant portion of young people experiencing homelessness. The programs-based approach of the Strategy will disproportionately affect LGBTIQ+ young people in the homelessness system, and without clear engagement with the LGBTIQ+ community throughout the implementation process this will see these initiatives undertaken without addressing the core drivers of homelessness for this group.

In 2021 YPN authored the State of Play Report into the experiences of LGBTIQ+ young people in the youth accommodation system. The report demonstrated an urgent need for significant strategic reform within the system in order to ensure the safety and wellbeing of LGBTIQ+ young people. I would like to reiterate key government recommendations provided in the report, including the need for LGBTIQ+ inclusion to be integrated into government strategy, which have not been achieved with this strategy.

Evidence provided in YPN's State of Play Report found many young people had experienced discrimination, violence and rejection from services based on their identity. Of the LGBTIQ+ young people surveyed who had accessed a youth accommodation service, 92% had one or more negative experiences.

A significant proportion of these responses are causally linked to the lack of training, support and funding provided to services. Staff within these services are often ill equipped to provide the necessary support to LGBTIQ+ young people under their care, and many are turned away due to a lack of training and awareness on how to best support them. Additionally, discrimination experienced in surrounding systems such as schools, workplaces, Centrelink, mental-health services and other services created further difficulties in accessing and continuing engagement with accommodation services.

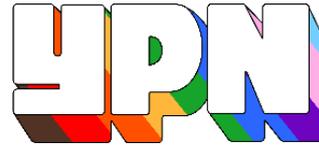
Safe, secure and stable homes cannot be guaranteed for LGBTIQ+ people if they are at risk of experiencing discrimination and violence based on their identity. Given the evidence presented in the State of Play Report, we know that it is crucial for any plans going forward to be deliberately inclusive of LGBTIQ+ young people. Extensive LGBTIQ+ inclusion training for both services and government departments is essential in combating discrimination and increasing the safety of LGBTIQ+ young people in those systems and across services. LGBTIQ+ inclusion into tendering processes and reporting will ensure accountability, while remedying the gap around safe methods of data collection for LGBTIQ+ young people moving through youth homelessness services will assist in identifying necessary resource allocations and directions for funding.

Young people who aren't affirmed in services will have worse outcomes, increased trauma and longer time in the homelessness system. Addressing existing problems now will ensure the long-term safety and wellbeing of LGBTIQ+ young people.

Yours sincerely,

Charlotte Glance  
Policy and Project Coordinator  
The Youth Pride Network

Cheyenne Henderson-Watkins  
Chair  
The Youth Pride Network



**The Inquiry into the Financial Administration of  
Homelessness Services in Western Australia**  
*Submission to the Standing Committee on Estimates and Financial  
Operations*

The Youth Affairs Council of Western Australia and the Youth Pride Network  
March 2022

## **Acknowledgement of Country**

The Youth Affairs Council of Western Australia and the Youth Pride Network acknowledge the traditional custodians of country on which this submission was developed, the Whadjuk people of the Noongar Nation, and their continuing connection to land, sea and community. We pay our respect to them and their cultures, to their Elders both past and present, as well as acknowledge and celebrate the ongoing contributions of their young people in our communities.

## **About the Youth Affairs Council of Western Australia**

The Youth Affairs Council of Western Australia (YACWA) is the peak non-government youth organisation that has been operating in Western Australia for over 40 years. YACWA functions primarily as a human rights organisation that seeks to address the exclusion of young people in a rapidly changing society.

Our vision for Western Australia is one that celebrates and engages young people in all aspects of the community. Our role is to strengthen the trust, cooperation, collaboration, professionalism, and voice of the non-government youth service sector to better serve the young people of Western Australia.

YACWA strongly believes that children and young people are the experts in their own experiences and wellbeing, and we are dedicated to ensuring that expertise is represented through equal access to community decision-making processes.

## **About the Youth Pride Network**

The Youth Pride Network (YPN) is an LGBTIQ+ youth-led advocacy group based in Western Australia. YPN uses systemic advocacy to work towards a Western Australia where LGBTIQ+ young people are accepted, included and celebrated by their communities and their human rights are upheld and prioritised by decision makers. YPN has a membership of over 300 LGBTIQ+ young people across Western Australia.

Established in February 2018, the YPN is self-directed and draws upon the views and expertise of its membership to address discrimination and isolation faced by LGBTIQ+ young people. YPN's work is governed by the principles of inclusivity, diversity, respect and equity.

## **Submission Endorsements**

This submission reflects a number of the key issues and recommendations raised by members of the youth sector raised at the Youth Homelessness Roundtable with the Department of Communities that was held on Friday the 12<sup>th</sup> of November 2021. Additionally, this submission has been specifically endorsed by the following organisations:

*Perth Inner City Youth Service*  
*Ruah Community Services*  
*St Vincent de Paul Society (WA) Inc*

## List of Recommendations

The list of recommendations summarised below are aimed at enhancing State Government strategic focus and investment towards addressing youth homelessness, aligning with the priority areas identified in the 'All Paths Lead to a Home: Western Australia's 10-Year Strategy on Homelessness 2020-2030' (the State Homelessness Strategy) and current progress to date.

### Recommendation 1

The State Government to pilot the implementation of the 'Homelessness System Alignment Analysis and Roadmap' (the Roadmap) with a specific focus on developing a more coordinated homelessness response for the youth homelessness system, including State and Federal Government funded services as well as non-funded services to ensure the full breadth of the system is taken into account.

### Recommendation 2

To gain a clearer picture of the youth homelessness system, the State Government should conduct a full review and mapping of youth homelessness services, including State, Federal and philanthropically funded services, as well as non-funded services to discover where gaps in funding are present. Ensure consideration is given within this process to current service output and projected demand in relation to the capacity provided by current funding allocations.

### Recommendation 3

The State Government to review the current state and scope of youth-focused actions implemented as part of the State Homelessness Strategy in order to quantify progress towards addressing youth homelessness and identify where more investment and focus is required.

### Recommendation 4

Following this review process the State Government should align with the Youth Homelessness Action Plan<sup>1</sup> that sits under the WA Alliance to End Homelessness' Community-led Strategy to end Homelessness by developing a youth-specific action plan to outline how the State Homelessness Strategy's priority areas and key commitments such as the Common Ground Model and Housing First Homelessness Initiatives being specifically implemented to address the needs of young people. This Youth Action Plan should also contain actions to targeted towards specific cohorts such as:

- i. LGBTQIA+ young people
- ii. Aboriginal and Torres Strait Islander young people
- iii. Young people with a disability
- iv. Young people under the age of 16
- v. Young people with complex mental health and/or alcohol and other drug issues
- vi. Young people affected by family and domestic violence
- vii. Young people living in financial and housing stress

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<sup>1</sup> YACWA & the WAAEH (2019). *The Western Australian Strategy to End Homelessness – Youth Homelessness Action Plan*. Retrieved from <https://www.yacwa.org.au/wp-content/uploads/Youth-Homeless-Action-Plan-YACWA-FINAL.pdf>

### **Recommendation 5**

The State Government to scale up efforts to implement action to implement priority action 2.1.3 of the 2020-2025 Action Plan to 'support the development of a Housing First for Youth Model<sup>2</sup>' by initiating a co-design process with young people and youth services with the intent of implementing a statewide model that provides young people with no barrier housing combined with intensive support to address complex issues and break the cycle of homelessness.

### **Recommendation 6**

The Department of Communities to engage with other key State Government departments identified as lead agencies in the 2020-2025 Action Plan such as the Department of Justice and Department of Education to determine progress and provide a public update on key youth-specific actions such as:

- i. 'Strengthen the planning and coordination of existing strategies and services that are context specific for students who are identified as at risk of homelessness.' (DoE - priority action 3.1.4)
- ii. 'Provide online information to teachers, support staff and all students about homelessness, which will include material on causes, indicators and available services.' (DoE - priority action 3.4.1)
- iii. 'Consider evaluation findings and recommendations of pilots or existing programs that provide cross-agency services in school settings (which) may include integrated school models, full service schools (and) child parent centres.' (DoE – priority action 4.2.3)
- iv. 'Facilitate pre-release throughcare planning to improve access to housing and support services for young people who would otherwise be homeless upon release from detention.' (DoJ – priority action 3.2.2)
- v. 'Review the appropriate model of service delivery and staffing resources to coordinate bail services for young people in regional and remote areas.' (DoJ – priority action 3.2.6)

### **Recommendation 7**

The State Government to adopt the recommendations outlined in the YPN's 'State of Play Report: LGBTIQ+ Young People's Experiences of the Youth Accommodation System' (the State of Play Report)<sup>3</sup> and ensure that a focus on LGBTIQ+ people is integrated into all current and future strategic focus and investment to reduce youth homelessness.

### **Recommendation 8**

The State Government to clarify how it is applying the principles of LGBTIQ+ inclusion across implementation of the State Homelessness Strategy and across service delivery in key investments such as the Housing First Homelessness Initiative, Common Ground facilities and homelessness service commissioning work.

### **Recommendation 9**

The State Government to review all data collection processes for youth homelessness services and develop a collective and transparent data system that eliminates, where possible, inconsistencies and inaccuracies in data reporting for homelessness services and facilitates better and more accessible support for young people.

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<sup>2</sup> The Department of Communities (2020). *All Paths Lead to a Home – Western Australia's 10-Year Strategy on Homelessness 2020-2030 (Action Plan 2020-2025)*. p11. Retrieved from <https://www.wa.gov.au/system/files/2021-06/homelessness-action-plan-2020-2025.pdf>

<sup>3</sup> The Youth Pride Network (2021). *State of Play Report: LGBTIQ+ Young People's Experiences of the Youth Accommodation System*. Retrieved from [https://www.youthpridenetwork.net/\\_files/ugd/34ec50\\_e736401c8c10402f93fef358737805eb.pdf](https://www.youthpridenetwork.net/_files/ugd/34ec50_e736401c8c10402f93fef358737805eb.pdf)

**Recommendation 10**

The State Government to explore a partnership with youth homelessness services to utilise and expand the By-Name List to more accurately capture statistics on youth homelessness in official data collection to better identify gaps and inform support for young people experiencing homelessness

**Recommendation 11**

The State Government to engage with the Federal Government through the National Cabinet and other state-federal collaborative mechanisms to advocate to improve data collection on youth homelessness in the Australian Bureau of Statistics (ABS) National Census, in order to more accurately collect information on cohort such as couch surfers and LGBTIQ+ young people.

**Recommendation 12**

The State Government to adopt inclusionary zoning in all new social housing developments with a portion of all new builds allocated specifically for young people under 25, alongside enabling youth homelessness services to provide intensive support through a HF4Y approach is required.

**Recommendation 13**

The State Government to address the growing unaffordability of the rental market and mitigate the significant loss in supply of affordable rentals due to the conclusion of the National Rental Affordability Scheme in 2026 by developing a state-based replacement scheme which partners with Community Housing Providers to manage and deliver an increase in supply of affordable rental housing, a portion of which should be allocated for young people who are unable to access affordable rentals and/or are under considerable financial stress renting in the private market.

**Recommendation 14**

The State Government to provide an update on the current progress of the Residential Tenancies Act Review and fast track reforms guided by the Make Renting Fair Alliance's Tenancy Ten<sup>4</sup> including ending unfair 'no grounds' evictions, stabilising rent increases and allowing reasonable modifications and pets.

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<sup>4</sup> The Make Renting Fair Alliance, 'The Tenancy Ten'. Retrieved from <https://www.shelterwa.org.au/our-work/advocacy/rental-reform/make-renting-fair/>

## Responses to the Inquiry's Terms of Reference

### ***Term of Reference 1: The current funding and delivery of services***

*Youth Homelessness Services require long-term funding that provides them with stability and security, as well as enabling them to proactively implement supports that prevent crisis and reduce the overall demand on the service system.*

Over the past couple of years we have heard from youth homelessness service providers across the state that many are in increasingly unsustainable positions of service delivery. Many have been significantly impacted COVID-19 and many are struggling to keep up with rising demand, with many operating with a significant shortfall between budgeted resources and the cost-of-service delivery. This impact has accelerated the untenable nature of continued contract roll-overs, placing detrimental effects on financial sustainability and service design. Many providers had for some time operated on 5+ year old contracts which have largely remained unchanged. A review of the service agreements for homelessness services found that many agreements were developed in 2009 and 2010, and under repeated short-term variations, meaning many were up to ten years old<sup>5</sup> until the recent and sorely welcome contract extensions that have been announced as part of the implementation of trial sites for a new approach to coordinating homelessness services as well as the development of the State Commissioning Strategy.

This short-term approach to contracting has left youth homelessness services and the homelessness system more broadly with little opportunity to renegotiate funding agreements in new contexts and with changing community needs. This means they have been unable to proactively plan future services to meet anticipated demand and instead are limited to reactive and crisis-driven approach that is unable to deliver the long-term support and rapid re-housing required to allow many individuals accessing services to break the cycle of homelessness. Adequate funding to meet changing needs is a critical component of agile and needs-based service delivery, and the provision of appropriate long-term contracting arrangements should be prioritised for the community services sector. Long-term contracts also provide services opportunities to test, evaluate, and adapt to better respond to needs which will improve the overall quality of service delivery. Importantly, however, old contracts must not be equated with 'out-of-date' service delivery, and caution should be exercised by contract managers and government agencies in this area.

Many service providers have developed deep knowledge of the communities they support, how to provide value for money, and created informal networks and protocols that enable them to support clients more effectively. Older contracts and service agreements may also not reflect the changing nature and details of service provision itself, which may have changed and adapted to changing circumstances and community needs. In addition, in periods where there is less 'demand' for services the temptation to wind back service delivery in some areas could lead to a rapid unravelling of the supports and networks maintained by service providers that sustain positive outcomes for many the community. As part of current attempts to reimagine the commissioning process, contract managers and funding agencies should exercise caution around older contracts and agreements by undertaking detailed services mapping within the youth homelessness sector to improve understanding the true importance of the supports provided and the lessons learned from successes and failures.

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<sup>5</sup> Collective IQ (2021). Homelessness Service System Alignment Analysis and Road Map. Prepared for the Department of Communities. Retrieved from <https://www.wa.gov.au/system/files/2021-10/Homelessness-Roadmap.pdf>

*Youth Homelessness Services must be engaged in a targeted co-design process in ongoing attempts to develop a more coordinated homelessness response, in order for investment priorities and systemic service models to better reflect the unique needs of young people and the sector that supports them*

The ongoing development of the State Commissioning Strategy has signalled a welcome shift to a more strategic commissioning approach in which both non-government services and service-users are empowered and engaged in the design and prioritisation of supports and funding that meets the core needs of the community. Additionally, the release of the Roadmap commissioned by the Department of Communities to determine how well the current Homelessness Service System is aligned to the State Homelessness Strategy, to identify gaps in implementation and to develop a Road Map to guide this shift into the desired state as outlined in the Strategy. Whilst the Roadmap presents a strong starting point to achieve this, it however is limited by the fact that it was commissioned to examine only services funded by the Department of Communities, thereby not taking into account the homelessness Service system in its entirety, including federally and philanthropically funded services, as well as many other services that have no core funding at all.

The Roadmap identified the core aim of the State Homelessness Strategy to shift an ‘accountable community system’ which is person-centred, place-based and outcomes focused, which also aligns with the intent of strategic commissioning<sup>6</sup>. In its evaluation of the State Homelessness Strategy’s progress towards this however it cautioned that key priorities such as the Housing First Homelessness Initiative and Common Ground Model, whilst intended to foster system-wide shifts in service delivery, have instead been somewhat fragmentedly implemented and concentrated into individual concepts within a program-led model of service delivery, therefore diluting their effectiveness in fostering system wide reform.

This is also an accurate reflection of how initiatives aimed at addressing youth homelessness services have been approached within the context of the State Homelessness Strategy. Despite its positive focus, it attempts to implement system-wide reforms into ‘catch-all’ programs whilst incorporating support for young people into broader adult-focused models, rather than facilitating a system-wide reform process for youth homelessness services. Whilst it is welcome to see the State Government acknowledge and act on the feedback provided through the Roadmap via the delivery of the trial sites, it is imperative that approaches to commissioning and delivery of youth homelessness services also are reimagined through a dedicated co-design process, considering the specific needs of young people and developing a tailored service system that meets them. This could be worked towards by utilising the direction set out by the Roadmap to trial a pilot that is specifically focused on developing a coordinated youth-homelessness response, with a remit including all funded and non-funded services that make up the broader youth homelessness system.

*LGBTIQ+ young people currently face difficulties in accessing safe and affirming youth homelessness support and require more strategic direction to mandate LGBTIQ+ inclusive practices into core service delivery.*

In 2021 YPN authored the State of Play Report which highlighted experiences of LGBTIQ+ young people in the youth accommodation system and the discrimination many still face. The report demonstrated an urgent need for significant strategic reform within the system in order to ensure the safety and wellbeing of LGBTIQ+ young people. Survey results and evidence provided in YPN’s State of Play Report found many young people had experienced discrimination, violence and rejection from services based on their identity. Of the LGBTIQ+ young people surveyed who had accessed a youth

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<sup>6</sup> Ibid.

accommodation service, 92% had one or more negative experiences. These negative experiences included homophobia, transphobia or queerphobia (52%), feeling unsafe (40%), staff ignoring other young people discriminating against them (32%), staff discriminating against them (24%), and experiencing violence because of their LGBTIQ+ identity (20%). In addition, 70.5% of Trans and Gender Diverse young people who'd accessed a service reported experiencing misgendering and 88.2% reported a negative experience related to their gender identity<sup>7</sup>.

A significant proportion of the feedback from both youth workers and young people noted a crucial link between these discriminatory experiences and the lack of training, support, funding and oversight on LGBTIQ+ inclusion provided to services. Many staff within these services are often ill equipped to provide the necessary support to LGBTIQ+ young people under their care, and many young people are turned away due to a lack of training and awareness on how to best support them. Extensive LGBTIQ+ inclusion training is recommended for both services and government departments to increase the safety of LGBTIQ+ young people in those systems and across services. Additionally, discrimination experienced in surrounding systems such as schools, workplaces, Centrelink, mental-health services and other services created further difficulties in accessing and continuing engagement with accommodation services.

Targeted funding for LGBTIQ+ inclusivity within both services and relevant government departments is crucial to ensuring staff feel adequately equipped to provide this support to an appropriate standard, and to preventing surrounding systems from being concurrent driving factors in homelessness. Additionally, the State Government must make LGBTIQ+ inclusion a key requirement of tendering and reporting on homelessness services. Ensuring inclusion is enshrined in tendering processes ensures that services that are LGBTIQ+ inclusive are appropriately funded and contracts are not awarded to services that will not appropriately service LGBTIQ+ young people. Inclusion in reporting also ensures that continuous improvement of services' LGBTIQ+ competencies can be monitored and incentivised by Government in partnership with the broader homelessness system.

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<sup>7</sup> The Youth Pride Network (2021). *State of Play Report: LGBTIQ+ Young People's Experiences of the Youth Accommodation System*. Retrieved from [https://www.youthpridenetwork.net/\\_files/ugd/34ec50\\_e736401c8c10402f93fef358737805eb.pdf](https://www.youthpridenetwork.net/_files/ugd/34ec50_e736401c8c10402f93fef358737805eb.pdf)

## ***Term of Reference 2: 'All Paths Lead to a Home', Western Australia's 10-Year Strategy on Homelessness 2020-2030***

*If we are going to be truly successful in ending youth homelessness in Western Australia the State Homelessness Strategy must implement a deliberate and dedicated approach to systemic reform and investment for youth homelessness services.*

The release of the State Homelessness Strategy and the WA Alliance to End Homelessness's (WAAEH) 'Western Australian Strategy to End Homelessness: A 10-Year Plan to End Homelessness in Western Australia 2018-2018' gave the State Government and Community Sector collective blueprints for collaborative action and a commitment to end homelessness in Western Australia within the foreseeable future. Although COVID-19 disrupted progress in order to implement rapid response to the immediate impacts of the pandemic, this has still been an important decisive shift in approach from simply managing homelessness to ending it. In many ways this optimism was justified, as the State Homelessness Strategy was an important first step towards ending homelessness, however this is no easy task and four years into its implementation, despite some positive progress and new initiatives, we have not yet seen the significant amounts of investment required to achieve this ambitious target.

This is especially true in regards to youth homelessness, as there has generally been insufficient action prioritised towards addressing the underlying causes of youth homelessness and intervening early to prevent at-risk young people from becoming entrenched in chronic rough sleeping, particularly when compared to investment in adult homelessness. Despite being identified as a priority cohort the State Homelessness Strategy, young people have largely been integrated into broad action across key commitments such as the Housing First Homelessness Initiative and Common Ground Model. Whilst these are welcome priorities, they have been designated as comprehensive services for all clients, whilst largely being managed and delivered by adult-focused homelessness services, with limited support by youth specialist services. Whilst we commend that there is a commitment to developing a Housing First for Youth (HF4Y) Model in the State Homelessness Strategy's 2020-2025 Action Plan (the 2020-2025 Action Plan) under priority action 2.1.3, there has been little identified action towards the progression of this and as a result it is unlikely it will be implemented by the conclusion of the identified timeline.

It is well-documented that young people are a cohort that experience high rates of homelessness, with those aged 12-24 making up 21% of the entire homeless population in Western Australia as of the 2016 Census<sup>8</sup>. This figure is likely an underrepresentation as homelessness among young people is often under-reported due to a tendency for young people to be staying in short-term or temporary accommodation such as couch-surfing. Often for these young people, a usual address will be reported and so they will not be counted on the census as homeless, despite them often experiencing unstable financial and living circumstances. Noting this need, YACWA, the WAAEH and the youth homelessness sector came together in 2019 to develop the Youth Homelessness Action Plan (the Action Plan), which was specifically tailored to addressing the needs of young people experiencing homelessness, not only those in crisis but as a holistic attempt to prevent and end youth homelessness in Western Australia. The Action Plan was developed through a 12-month co-design process including young people with lived experience of homelessness, youth homelessness services, peak bodies, community leaders and key State Government Agencies. It contained a broad set of whole of community actions to facilitate

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<sup>8</sup> Australian Bureau of Statistics (2016). *Census of Population and Housing, Estimating Homelessness*. Retrieved from <https://www.abs.gov.au/AUSSTATS/abs@.nsf>

systemic reform in line with the priority ideas identified under the State Homelessness Strategy and could be used as a guiding document for the State Government to ensure its current and future strategic priorities are addressing key issues across the youth homelessness.

It is essential that any approach to ending homelessness targets young people as a key cohort and prioritises and delivers the long-term investment required for initiatives that attempt to intervene and break the cycle of homelessness as early as possible. If we solely focus on those who are already entrenched in chronic rough sleeping, we will fail to disrupt the pathways that cause individuals to be homeless early in life. Any response to homelessness that does not do this, risks causing lasting negative consequences for a new generation of chronic rough sleepers. Homelessness itself is considered a form of trauma, with a strong interdependent relationship with mental health, employment, connection, and wellbeing.

*Current approaches to embed a Housing First approach in the homelessness system in Western Australia demonstrate why a distinct but aligned approach to systemic reform for young people is needed.*

The current approach to the development and implementation of a Housing First Service System in Western Australia is a clear example where a specialised approach for young people is needed. Instead, existing reform and investment has attempted to incorporate the needs of young people into a broader adult-focused model. Research indicates that the causes and conditions of Youth Homelessness are distinct from adults and as a result, adaptations to the model are required that incorporate the changing developmental needs of young people.

Housing First for Youth (HF4Y) is an internationally developed approach which adapts this broader Housing First model by acknowledging and addressing the distinct causes and conditions of youth homelessness. There is a growing body of both national and international evidence which demonstrates that young people receive fewer positive outcomes from a traditional Housing First models as opposed to adults. As a result, modification of the model is required to better meet their needs. The Canadian HF4Y Program Model Guide articulates both the philosophy behind HF4Y and its key differences from Housing First. It is a key document which provides a comprehensive blueprint for implementing HF4Y successfully.

A key distinction that sets HF4Y apart as a specialist model is that its goal is not simply to provide an individual with housing stability, but often what is needed for a young person more so than adults is intensive service support to assist them to holistically achieve their goals and facilitate a healthy transition into adulthood. The HF4Y principles, as stated within the Canadian Model, are critical elements for Housing First to be successfully adapted to meet the needs of young people experiencing homelessness<sup>9</sup>.

A key distinction around HF4Y is that young people generally require a range of housing options be made available to them for this approach to be successful. Many Housing First programs for adults do not have the same variety of housing options available as should be the case in HF4Y. Learnings from the 50 Lives 50 Homes Housing First Project in Western Australia has shown that the key cause of young people exiting the program was the lack of alternative housing options available – having rapidly

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<sup>9</sup> Gaetz, S., Walter, H. and Story, C. (2021). *THIS is Housing First for Youth. Part 1 – Program Model Guide*. Retrieved from <https://www.homelesshub.ca/sites/default/files/HF4Y-Program-Guide-Jul-15.pdf>

accessible re-housing alternatives is critical to the success of HF4Y as young people must be given the opportunity to secure alternative accommodation if their original choice is not working for them.<sup>10</sup>

*The specific circumstances and needs of cohorts such as LGBTIQ+ young people that are disproportionately impacted by homelessness need to be integrated into all State Government strategy in order to embed inclusion across the service system.*

YPN's State of Play Report recommends that LGBTIQ+ inclusion to be integrated into government homelessness strategies, which is not currently being prioritised or achieved as part of existing implementation of the State Homelessness Strategy. The evidence documented in the Report highlights the severe and disproportionate effects of homelessness on LGBTIQ+ young people and the discrimination they face when accessing services, reinforcing the need for a targeted approach to be embedded in strategic reform.

LGBTIQ+ people were not mentioned in the initial State Homelessness Strategy, which raises concerns that the needs of LGBTIQ+ young people were not properly considered in the development of the strategy. In addition to this, the Strategy's 2020-2025 Action Plan only contains two actions (Priority Actions 3.1.1 and 3.1.7) which mention the development of improved responses for vulnerable cohorts such as LGBTIQ+ young people, and there is little information on how implementation of these has progressed. Approaches to progressing these actions need to engage LGBTIQ+ community run services and adopt the national 'LGBTIQ+ Inclusive Practice Guide for Homelessness and Housing Sectors in Australia' as part of the current commissioning work in a way that is transparent and led by the LGBTIQ+ community.

The omission of LGBTIQ+ young people in housing and homelessness policies and investment will only continue to exacerbate existing inadequacies that prevent LGBTIQ+ young people from being supported, as well as failing to address existing LGBTIQ+ discrimination within the system. This is particularly relevant for proposed initiatives such as a No Wrong Door system, the Common Ground Model and the Housing First Homelessness Initiative. Without addressing discrimination and barriers LGBTIQ+ people face to accessing homelessness services, these initiatives risk repeating and entrenching that discrimination and not effectively addressing LGBTIQ+ youth homelessness. For example, a No Wrong Door approach cannot operate successfully if an LGBTIQ+ young person does not feel safe to disclose, or is not asked about, their LGBTIQ+ identity. Without that information a service cannot appropriately and safely refer them.

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<sup>10</sup> Zero Project WA (2021). *An Evaluation Snapshot: Youth Experiences of Housing First*. Retrieved from [https://www.csi.edu.au/media/uploads/youth\\_experiences\\_of\\_housing\\_first\\_zero\\_project\\_snapshot.pdf](https://www.csi.edu.au/media/uploads/youth_experiences_of_housing_first_zero_project_snapshot.pdf)

### ***Term of Reference 3 - Existing data systems and how data informs service delivery***

*Existing data collection systems are ill-equipped to capture the true nature of the complexities of youth homelessness.*

The State Government's methods of data collection on youth homelessness are generally reliant on reporting on service output from funded youth sector organisations as well as the five-yearly ABS Census. Young people are often underrepresented in these data sets, due to several important factors

- Youth homelessness is very distinct from adult homelessness, as young people are often much less visible on the street, and more likely to be couch surfing.
- This means that they may not currently be accessing funded youth homelessness services as they themselves may not identify as homeless.
- In regard to the census data, young people who are staying in short-term or temporary accommodation such as couch surfers are often reported as living in their current address and therefore they will not be counted on the census as homeless, despite experiencing unstable financial and/or living circumstances<sup>11 12</sup>.
- Not only are there many cohorts of young people experiencing homelessness that fail to be adequately counted, services that are not funded by the State Government yet provide significant support and engagement to young people experiencing homelessness currently have little chance of being included in current government data. This causes a significant issue in exacerbating the underrepresentation of young people in the homelessness data sets.

Despite there being many other locally based sector-led approaches data collection, these are not often considered by the official State Government statistics informing service investment due to a prohibitive reliance on methods such as internal reporting and the Census. One such example is the By-Name List (the BNL), which is a real-time list of individuals currently rough sleeping in the community. It includes a robust set of data points that support coordinated access to services and prioritisation of need. Currently the BNL receives some funding from Lotterywest however receives little ongoing direct funding from State Government agencies, and de-identified BNL data is often not included in primary data in favour of less-contemporary statistics from the Census. Not having the required resources to fully capture hidden forms of homelessness that young people are often overrepresented in such as couch surfing has meant that youth homelessness statistics are suspected to be underrepresented on the BNL data<sup>13</sup>. The BNL is an existing tool which would be perfect for the State Government to implement a collaborative project which intends to capture a range of youth services and data collection for particular geographical areas, assisting to identify gaps and the variety of homeless support responses require to make an impact

Data collection across different cohorts, levels of government and services as well as sharing of this data is a difficult task, however it is one of the most crucial to developing a robust and accountable community services sector. Feedback from youth services consistently highlights that data that is collected by the State Government is often not shared back to the sector in any meaningful way, with most contracted services acknowledging there is limited feedback on bi-annual reports nor any

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<sup>11</sup> Australian Bureau of Statistics. (2018). Youth Homelessness. 2049.0 - Census of Population and Housing: Estimating homelessness, 2016. Retrieved from <http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/2049.0Main%20Features302016?opendocument&tabname=Summary&prodno=2049.0&issue=2016&num=&view>

<sup>12</sup> Cooper T and Brooker M.R 2010, 'Support for Homeless Young People Under 16 Years Old: Towards a New Paradigm', *Journal of Applied Youth Studies*, Vol.3, pp.43-64.

<sup>13</sup> The Zero Project WA (2022). *Track Our Progress*. Retrieved from <https://zeroprojectwa.org.au/track-our-progress/>

collation of data across services that could report on the significant work being undertaken and outcomes gained. Additionally there is no uniform reporting of unmet need as this continues to be not well defined across the sector, contributing to the ongoing failure of rolling contracts to keep up with demand. If data is to be collected, analysed and evaluated effectively it must be collaboratively and transparently shared between both the State Government and Community Sector as well as other funding bodies across other levels of government and the philanthropic sector.

One example of a cohort of young people where there is a significant gap in data are those experiencing homelessness under 16. This has led to a gap in adequate policy responses and available services to meet the needs of this vulnerable population<sup>14</sup>. This is because the ABS Census does not collect data about young people under 15 who are independently homeless, as well as the lack of available services for this cohort. Despite this missing data, it is clear there is a policy response needed in this space as many youth homelessness services have provided anecdotal feedback rise in young people aged 12-15 seeking accommodation but being unable to access this due to a lack of services funded to deliver support to those under 16<sup>15</sup>.

LGBTIQA+ young people are another cohort who have been poorly captured in data collection at both a state and national level. As a result there is very little data on rates of LGBTIQA+ young people experiencing homelessness as well as their rates of service access. This is compounded by lack of overall data on LGBTIQA+ communities (e.g. census reporting) which contributes to policy gaps, a lack of targeted prevention and intervention and underestimation of the importance of mandated LGBTIQA+ inclusive practice across the homelessness services. Developing and expanding on safe methods data collection currently implemented by LGBTIQA+ inclusive services will allow for appropriate funding to accurately meet the level of demand from LGBTIQA+ young people. An understanding of the current state of LGBTIQA+ inclusive practice in services is vital when assessing service availability and where future investment should lie. Without this understanding strategies risk over-estimating the level of services that LGBTIQA+ young people can actually access or missing the over-subscription to those services that are inclusive.

In order to improve data collection processes they must be considered critical elements of the commissioning cycle, with dedicated resourcing and adequate time frames to partner in undertaking them effectively, as well as built in resourcing for evaluation and data sharing across all relevant key stakeholders. This is vital to maintain quality — ensuring evaluation is supported and appropriately facilitated by the right people with the right skills and able to occur within the right time periods. The role of independent evaluation should be considered as an option to support service providers and funders to have honest conversations about what is working and what isn't within existing service agreements and funding timelines. This could be supported by shared evaluation officers that work across portfolios/funding buckets to guide collection and data analysis early (e.g. from service design to delivery).

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<sup>14</sup> The Commissioner for Children and Young People (2017). Homelessness in young people aged under 16 years: A literature review. Retrieved from <https://www.cyp.wa.gov.au/media/2489/literature-review-homelessness-under-16-years-final-web-file.pdf>

<sup>15</sup> Cooper, T. Baker, M.R (2020). Support for homeless young people under 16 years old: Towards a new paradigm. *Journal of Applied Youth Studies*, 3, 43-64. Retrieved from <https://ro.ecu.edu.au/cgi/viewcontent.cgi?article=9892&context=ecuworkspost2013>

#### ***Term of Reference 4 - Any other related matter***

*Increasing social and affordable housing stock in partnership with the community housing sector must be a crucial part of any strategy to end homelessness and address rising costs of renting*

Whilst this Inquiry is focused the financial administration of homelessness services, it is worth mentioning the symbiotic nature of housing supply and affordability as crucial to the ability of homelessness services to provide support to those most vulnerable. As has been the case over the last few years, there are still no affordable houses available in Western Australia for a young person on youth allowance<sup>16</sup>. This placed further stress on our already overburdened housing system, with the social housing waitlist rising to over 18,000 households by November 2021, including 3716 priority applicants<sup>17</sup>. Research by the University of New South Wales has identified a current unmet need of 39,200 social and 19,300 affordable homes across Western Australia.<sup>18</sup> If we continue the same trajectory, it has been estimated that by 2036 WA will have a shortage of 86,400 social homes and 32,000 affordable homes.<sup>19</sup>

The \$875 million social housing investment in the 2021-22 State Budget including the \$750 million Social Housing Investment Fund was very welcome,<sup>20</sup> however we know that is still some way short of what is needed to meet long-term demand. That's why we hope that current investment the starting point for a more ambitious long-term plan to greatly increase the availability of social and affordable housing. It is imperative that initial builds are prioritised for those severely at-risk of or entrenched in homelessness, in order to provide a swift intervention to break the cycle of homelessness.

If the State Homelessness Strategy is to be successful in implementing its stated priority of embedding a Housing First approach in the homelessness response system, it is crucial that there is a readily available supply of social and affordable housing to enable a high-fidelity Housing First system to operate effectively to rapidly provide safe, secure and stable homes as a core response to homelessness. This is particularly important for the adaption of the model to Housing First for Youth. Evidence has shown that young people generally require a range of housing options be made available to them for HF4Y to be successful. Many Housing First programs for adults do not have the same variety of housing options available as should be the case in HF4Y. As mentioned in Term of reference 2, it is crucial that we allocate a specific portion of current and future social and community housing build for young people under 25, so that it may be leveraged for H4FY and other initiatives that assist young people at risk of or experiencing homelessness to access housing and other supports.

*The State Government has a number of existing and future opportunities available to make renting fairer and more affordable for young people in Western Australia.*

Not only does the State Government need to prioritise increases in Western Australia's social and affordable housing supply, it must also ensure more work is being done to directly address the State's rapidly worsening rental crisis. In her opening remarks in Anglicare's Rental Affordability Snapshot,

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<sup>16</sup> Anglicare WA (2021). *Rental Affordability Snapshot 2021 Western Australia*. Retrieved from [https://www.anglicarewa.org.au/docs/default-source/advocacy/anglicare-wa---rental-afforabilitysnapshot-2021.pdf?sfvrsn=dba8e99b\\_6](https://www.anglicarewa.org.au/docs/default-source/advocacy/anglicare-wa---rental-afforabilitysnapshot-2021.pdf?sfvrsn=dba8e99b_6)

<sup>17</sup> Question in parliament by Hon. Dr Brad Pettitt:

[https://www.parliament.wa.gov.au/Hansard/hansard.nsf/0/de1cc061a7c0fd76482587a3001ef7d7/\\$FILE/C41+S1+20211202+p6137b-6137b.pdf](https://www.parliament.wa.gov.au/Hansard/hansard.nsf/0/de1cc061a7c0fd76482587a3001ef7d7/$FILE/C41+S1+20211202+p6137b-6137b.pdf)

<sup>18</sup> UNSW City Futures Research Centre (2018). Estimating need and costs of social and affordable housing delivery. Retrieved from

[https://cityfutures.be.unsw.edu.au/documents/522/Modelling\\_costs\\_of\\_housing\\_provision\\_FINAL.pdf](https://cityfutures.be.unsw.edu.au/documents/522/Modelling_costs_of_housing_provision_FINAL.pdf)

<sup>19</sup> Ibid.

<sup>20</sup> Media statement - [\\$875 million to significantly boost social housing in WA](#), 5 September 2021

Anglicare Australia's Executive Director Kasy Chambers summarised the Report's findings by stating that Australians are dealing with a rental market that has "never been less affordable"<sup>21</sup>. This has been brought into sharp focus in Western Australia, with average weekly rent increasing by 21.6% in the 12 months leading up to June 2021, the highest increase of any capital city across the country<sup>22</sup>.

The winding down of the National Rental Affordability Scheme (NRAS) between now and 2026 carries a significant risk of reducing Western Australia's affordable housing supply even further. This scheme offered financial incentives for housing providers to provide affordable rentals for eligible participants. In Western Australia there are 4,847 NRAS allocations (dwellings) with subsidies ceasing from 2022-2026<sup>23</sup>, which given the limited existing availability of rentals in the private sector would only serve to worsen the rental crisis. This however opens up a significant opportunity for the State Government to replace and improve the NRAS with a state-based equivalent that leverages the capacity and potential of Community Housing Providers to deliver long-term affordable rentals to provide relief for those locked out of the private rental market. Rather than a temporary placement with a private landlord, enabling Community Housing Providers to take on a greater role in providing long-term, safe and stable rentals for vulnerable individuals. YACWA supports Shelter WA in their calls for a state-based NRAS replacement and recommends that this scheme prioritises an allocation for young people who are unable to access affordable rentals and/or are under considerable financial stress renting in the private market.

There are also a couple of ways in which the State Government can make the private rental market fairer for young people and reduce the power imbalance that currently exists between landlords and tenants. With the review of the Residential Tenancies Act (the Act) ongoing since 2019 there are several proposed important reforms that are in limbo despite being crucial to improving renting conditions for low-income and vulnerable young people. The Act as it currently exists gives landlords significant power to evict tenants without reason, increase rent unreasonably and prevent renters to make small modifications to the property or own pets. Those in public housing also have fewer protections than those in private rental, despite being some of the most vulnerable people in the community.

A national study from 2017 found that over 55% of people under 35 reported being discriminated against whilst renting, 14% more likely than those over 35 and 22% said that the discrimination was because of their age<sup>24</sup>. The impact of COVID-19 and the end of the evictions and rent increase moratorium has caused a significant reduction in the amount of rental vacancies whilst simultaneously increasing the average cost of renting, leading to a high demand for private rentals. This lack of options for tenants has made the power imbalance between landlords and renters even greater, further reinforcing the crucial need for reform to the Act.

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<sup>21</sup> Anglicare Australia. (2021). Rental Affordability Snapshot: National Report / April 2021. Retrieved from <https://www.anglicare.asn.au/wp-content/uploads/2021/05/rental-affordability-snapshotnational-report.pdf>

<sup>22</sup> Domain Real Estate. (2021). June 2021 Rental Report. Retrieved from <https://www.domain.com.au/research/rental-report/june-2021/>

<sup>23</sup> [https://www.dss.gov.au/sites/default/files/documents/01\\_2022/december-2021-nras-quarterly-performance-report\\_0.pdf](https://www.dss.gov.au/sites/default/files/documents/01_2022/december-2021-nras-quarterly-performance-report_0.pdf), Table 3b

<sup>24</sup> Choice. National Shelter. National Association of Tenant Organisations. (2017). Unsettled: Life in Australia's Private Rental Market. Retrieved from <https://www.choice.com.au/money/property/renting/articles/choice-rental-market-report>