31 August 2012

SHS Reform Team
Housing NSW
Department of Family and Community Services
223-229 Liverpool Rd
Ashfield NSW 2131

Dear Reform Team

I refer to the invitation to provide comments on the Future directions for specialist homelessness services consultation paper.

Homelessness NSW is a small not for profit peak organisation, which works with its 170 member agencies to reduce and prevent homelessness.

We were able to attend several of the recent regional forums convened by Housing NSW on the Going Home Staying Home reform agenda (GHSH) as well as meet face to face with several local members which also participated in the forums.

The broader landscape

Significantly reducing and preventing homelessness is one of the “wicked” social issues that Governments and the community face in contemporary Australia.

Recent “rough sleeper” counts conducted in the Sydney CBD and in some other capital city locations suggest the level of street homeless people may be dipping slightly. At the same time, there is evidence of an increase in the numbers of people at risk of homelessness whose living standards are rapidly eroding.

Large increases in the numbers of recipients of emergency relief, food packages and energy assistance payments are reported. When combined with significant turn way rates at SHS services and a major growth in Temporary Accommodation assistance, the strong suggestion is that many more households are living closer to the margins, especially families with children.
Productivity Commission data indicates that the proportion of renters in Sydney receiving Commonwealth Rental Assistance in rental stress increased from 43.9% in 2007 to 50.2% in 2011.

Unpublished data indicates that in NSW, people aged over 65 may now represent 25% of all people considered at some risk of homelessness.

The recent COAG Reform Council report on the performance in 2010-11 of the National Affordable Housing Agreement (NAHA) painted a bleak picture, with all three performance indicators for housing affordability achieving negative results.

It is in this rapidly changing environment that setting new priority directions for investments in a service system designed to reduce homelessness must be informed.

**General comments on the reform directions for the homelessness system in NSW**

Homelessness NSW supports, in principle, reform of the homelessness service system. We emphasise that a key driver of the reform must be building on the existing strengths that are clearly exhibited in changes made by local and regional services themselves in recent years.

There is strong support for more focus on the prevention of homelessness in both changes to the services system and related policy initiatives of Government.

The establishment of active linkages between programs designed to assist vulnerable families, children and young people, early childhood education services, population health prevention strategies, job placement services and the like should be championed out of this reform process.

There are several current examples (SHS and HAP led) of hubs or networks/clusters of specialist and mainstream services which do work well. There is however a need for dedicated additional resources to strengthen and enhance these collaborations.

Brokerage programs are strongly supported, especially if they encompass a diverse breadth of products and services. However, there must be an adequate service system available to effectively broker clients into and through, whether in urban or rural areas.

There is strong support for partnering and collaboration between specialist and mainstream services to achieve positive client results, especially with a more holistic approach to wellbeing.
However, there needs to be assistance provided to help make these arrangements and the practices work well, including capacity building for participating organisations. Several member organisations indicated that peak SHS organisations are the preferred auspice of such assistance.

At most of the regional forums, small organisations expressed concerns about either being swallowed up by larger ones or disappearing as new entrants enter to the homelessness services system and as competitive tendering processes rewarding efficiencies through scale and quality may become the method of resource allocation.

To this end, Homelessness NSW suggests that at this early stage, FACS makes a commitment to retain a diverse service provider base in homelessness services delivering a diverse mix of service models.

Depending upon the funding mechanisms chosen as this reform agenda is further developed, we also suggest to FACS that it commit to supporting the efforts of small organisations where they deliver positive client results with strong local community support and, with the peaks, enable clusters of small organisations to enhance their structural capacities as required.

There is universal support from SHS members for the generation of more social and affordable housing, so that both prevention of homelessness can be enhanced and that speedy and successful exits from the homelessness service system can be better achieved. Put simply: Housing First can’t work without housing.

At the launch of GHSH, indications were given about the importance of linking the reform of the homelessness services system with other activities of the NSW and Commonwealth Governments to increase the supply of affordable housing, such as Planning Law reforms, the broader outcomes of a renegotiated NAHA, other tax related incentives such as NRAS and boarding house reform regulation.

This consultation period on GHSH has confirmed the primacy of the alignment of these activities.

Many Homelessness NSW members have commented on the role of Housing, FACS in unintentionally contributing to increasing homelessness. This relates to the impacts of some of the recent changes to TA, Rentstart and private rental subsidy.

Homelessness NSW does note, at the same time, the various “trials” that are being sponsored through several local/regional Housing NSW offices to establish many more collaborative relationships with homelessness services and utilise TA in a far more effective manner. We also note the two Rapid Rehousing initiatives that are due to commence in Coffs Harbour and Penrith-Mt Druitt before the end of 2012.
Further very strong messages that Homelessness NSW has received during this consultation phase are:

- A suite of reformed models of service delivery must not be designed and implemented with a “one size fits all” approach. This is true for future service system arrangements between and within regions;
- A focus on better access to mainstream services and reforming the way in which they work with the homelessness services system is also a key element of improving what we currently do; and
- There are significant levels of rental brokerage and tenancy maintenance effort taking place across NSW through government and non-government agencies, including a fair degree of service provision that is neither SHS nor HAP funded. Expanding the coverage and effectiveness in the rental brokerage area is seen as important in the reform agenda.

Specific comments on the “building blocks”

(a) Individualised approach

There needs to be a transparent and detailed discussion/consultation about individualised approaches to client service delivery, especially where it involves funding of service through client packages, which may be attached to the client/broker, as opposed to the service provider.

A view is emerging that supports a mix of funding approaches that are dependent upon the various models of service delivery to be used and the capacities of providers to effectively provide the service mix locationally.

A focus on client centred practice that includes integrated case management, explicit standards of service, consumer complaints mechanisms and an emphasis on results is one that is supported by Homelessness NSW.

Effectively costing different models of service delivery that focus on individualised approaches and the intended outcomes for different cohorts amongst the homeless and those at risk of homelessness is also seen as a challenging but necessary process which must be done transparently.

(b) Streamlined access

There is support for common client access, assessment and referral systems to be developed and used in NSW so long as there remains flexibility for providers at the local level and any use of e-client records is appropriately informed by the latest privacy safeguards.
Many SHS members have also raised the importance of building an electronic accommodation vacancy listing and client wait list capacity into any e-based systems which are developed. We note that major member providers, Mission Australia and the Salvation Army, already use data and client record/referral systems which have had significant investment in them in recent years and would suggest that opportunities to value add should be maximised in the technology side of these developments.

(c) Better planning and resource allocation

Homelessness NSW strongly supports an approach which better matches contemporary demand for all forms of homelessness services and the availability of such services at a regional and local area basis.

We note that there are various pieces of work being conducted to describe and analyse the supply of homelessness services at present (PwC analysis of SHS/TA data, Service mapping and sector capacity building projects, Housing NSW indices of households at risk of homelessness, previous and projected Census counts etc).

There needs to be a constructive discussion about how all of the above pieces of data and commentary fit together to inform a planning and resource allocation model, at the State-wide and at the regional levels.

The planning and resource allocation discussions will also need to be informed by other key discussions about service delivery models, their effectiveness and their costs (eg funding levels provided to any specific region/set of localities must enable a mix of the most effective service models to actually be provided)

The evidence gained from the current evaluations of the NSW Homelessness Action Plan projects, previous SAAP evaluations, National Partnership on Homelessness Research reports and PwC and other assessments of the status of SHS clients post support periods as opposed to pre service assistance will all be important to dissect when discussing the service models and hence the planning and resource allocation approach.

As indicated in the individualised approach comments, Homelessness NSW suggests that a detailed discussion about the appropriateness of different funding models as they pertain to different models of service and expected client outcomes should also be held as a key element to help inform the resource allocation approach.
(d) Promote and support quality improvement

The proposed quality improvement framework must entail recognition of quality systems already being used by many homelessness services and, their parent bodies where appropriate (mutual recognition).

Homelessness NSW understands that discussions about a National Quality Framework for homelessness service provision has re-emerged on the national agenda, as well as moves to commence the new National Regulatory System for Community Housing (many SHS members are registered under the existing NSW system and will seek to transfer when the national system commences).

Accordingly, the implementation of relevant quality standards and assurance into the homelessness service system in NSW will also have to be adequately resourced in terms of staff and Board training, as well as meeting the requirement of not increasing “red tape”.

Homelessness NSW notes that one element of streamlined procurement arrangements may mean an interest by Government as the funder to reduce the number of funding contracts it administers. It is important that such a goal not determine that there needs to be much fewer service providers but that this goal can be achieved through differing contracting arrangements such as contracting with consortia of independent organisations, lead agencies - sub contractors and joint venture entities.

A focus on measuring client outcomes and properly evaluating the effectiveness of models of service delivery should be the hallmark of revising performance management approaches.

(e) Industry and workforce development

The Australian human services sector is witnessing several changes to priority goals of Government programs, service delivery arrangements and funding methods.

It is clear that varying degrees of structural adjustment are taking place in sectors such as disability services, community care, and early childhood services whilst significant changes have taken place in employment services and are targeted to occur in aged care over the next years.

SHS organisations will require assistance with reconfiguring their existing service delivery models and arrangements, up and re skilling their workforces and effectively managing the culture of change that takes place over the next 3 -5 years.
As previously indicated, many SHS members of Homelessness NSW have raised their preference for peaks like ours to have the capacity to provide, broker or contract relevant expertise and associated resources for them to utilise as the reform agenda gains momentum.

Homelessness NSW is pleased to see the initiative taken by FACS in allocating resources for adaptive leadership activities as part of developing the change agenda and processes. Careful consideration needs to be also given about the most appropriate and effective ways of providing leadership skills assistance at a regional level and with clusters of locally based service providers in the future.

Integrated case management, partnering and joined up service delivery all require skills development within the homelessness sector. At the same time, the NSW Government must deliver on its commitment to pay its fair share to homelessness services which will be delivering equal pay case salary increases over the next 8 years.

Conclusion

In their paper, Mapping and Reviewing Homelessness Programs, Baulderstone and Button (2011) identify 5 factors that are important in effectively assisting homeless people:

- the importance of securing access to housing to assist in longer-term recovery and prevention of homelessness.
- the role of the pivotal client/worker relationship in recovering from and preventing, homelessness.
- the importance of being able to provide practical assistance as well as case management.
- the long tradition and importance of service collaboration to build service capacity to help clients.
- the importance of long-term flexible support to help prevent recurring bouts of homelessness.

Homelessness NSW would suggest that these 5 features must be present, along with the availability of suitable and affordable housing and the active participation of other health and human service agencies if the Going Home Staying Home reform agenda is to be effective.

Yours sincerely

Gary Moore
Chief Executive Officer