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Tasmanian Homelessness Plan feedback
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Dear Sir/Madam

The Tasmanian Council of Social Service (TasCOSS) welcomes the opportunity to comment on the Tasmanian Homelessness Plan 2010-2014.

TasCOSS is the peak body for the Tasmanian community services industry. It represents both the interests of Tasmanians who are affected by poverty and inequality and the organisations that provide community services.

TasCOSS congratulates the State Government on the plan developed as part of the National Partnership on Homelessness and on its commitment to address all three categories of homelessness. We look forward to further detail on how the plan is to be implemented but support the elements identified in the existing framework.

Most importantly the Plan includes commitments to increasing the supply of affordable housing stock and addresses key issues such as:

- Early intervention and prevention;
- Better integration of services including the engagement of mainstream services; and
- Research and data collection to support on-going improvements in service delivery.

The Plan comes at a time in which we have both Tasmanian and Australian social inclusion agendas emerging and there is the opportunity to explore homelessness within the context of the broader plan of addressing social disadvantage. Unfortunately, this is where it would seem that some opportunities have been missed.

Action on the structural drivers of homelessness

The Homelessness Plan quotes the White Paper on Homelessness' reference to *tackling the structural factors driving homelessness* and the first element of the Plan is 'Prevention and Early Intervention'. The State Government is congratulated on the fact that the Plan recognises these structural influences on homelessness and together with Australian Government makes some provision for addressing them (eg through provision of social and affordable housing). Unfortunately, the measures proposed do not go far enough to turn around the drivers of homelessness in Tasmania.

Put simply, people cannot stop being homeless if there aren't enough homes (Flanagan 2009)

Homelessness commentators have repeatedly stated that the key structural driver of homelessness is the lack of affordable housing stock. A recent Senate Committee looking at affordable housing recommended that the appropriate target is to provide for an increase in social housing to at least 10% of total housing stock by 2020 (SCHAA 2008). On the basis of current Tasmanian housing stock levels that would equate to around 20 000 properties (with current social housing stock around 12 000 properties).

The provision within the Plan for 2000 more affordable housing places over the next 5 years will provide a significant initial step, but this will need to be followed by continued significant investment in social housing to make a lasting impact on the levels of housing stress and homelessness in Tasmania. It should be noted that of the 2000 properties to be made available, around half of these will be National Rental Affordability Scheme properties, which while very welcome (offered at 80% of market rent), will not be affordable to many Tasmanians on low incomes, especially those reliant on income support.

Investment in public housing

None of the investment proposed is in public housing. The recent report by the Australian Social Inclusion Board *How Australia is Faring* examines the extent of rental stress in Australia. The report indicates that almost 50% of low income private renters across the country were experiencing rental stress in 2005/6 compared to about 2% of public housing renters.

Australian studies have found public housing has been found to be cost effective; a valuable contributor to quality of life for people on low incomes; and more effective than Commonwealth Rent Assistance in protecting low income earners from severe housing stress (Anglicare 2008). For many Tasmanians who do not have access to the private rental market because of low income, discrimination or blacklisting, public housing or the limited community housing market are their only options. It is a disappointment that with recent massive investments in infrastructure, opportunities have been missed at both State and Federal levels to make the investments required to build healthy public housing systems.

The lack of adequate affordable housing in Tasmania will hamper efforts to foster early intervention and prevention initiatives by mainstream agencies. It is suggested

that currently non-specialist housing services are rarely unaware of homelessness as an issue for their clients, but the simple reality is that there are rarely viable options available beyond the hope of emergency housing. Services would be much more likely to intervene earlier if they were confident that there were housing solutions available to their clients.

Emergency accommodation

TasCOSS supports the Plan's focus in terms of new housing to provide adequate exit points from emergency accommodation, but these new accommodation options are unlikely to ease the burden on crisis accommodation in the short to medium-term. Specific gaps include facilities for single men and men or couples with children.

The private rental market

In addition to increasing the supply of social and affordable accommodation, the Plan should include initiatives which enhance the capacity of the private rental market to appropriately house low and moderate income Tasmanians. Measures should include:

- Introducing minimum standards for rental accommodation;
- Establishing a Residential Tenancy Tribunal to deal with disputes;
- Introducing a standard formula for determining rent increases; and
- Increasing minimum notice periods for notices to vacate

Structural and individual drivers of homelessness

Beyond the availability of affordable housing, other structural drivers of homelessness include poverty, income inequality and low educational attainment. The Plan identifies mental health and alcohol and other drug issues and the incidence of family violence as individual factors impacting on homelessness, but an understanding of their interdependence with structural factors such as those identified and the service supports available to deal with these issues is important in terms of leading us to solutions for ameliorating their impact. None of these issues is seriously addressed as part of the proposed homelessness plan 'early intervention and prevention' initiatives.

Details on the Homelessness Plan's implementation phase are not yet available. There has been no indication, however, that significant investment in initiatives that address the structural drivers of homelessness, such as investment in:

- Improving the rate of concessions for people on low incomes for essential services;
- Investment in additional support for young people disengaged from schooling;
- Bolstering community mental health teams;
- Investing in alcohol and other drug services;
- Increasing child protection teams;
- Reducing bet limits on gaming machines;

- Introducing mandatory relationships education directed at reducing family violence; and
- Providing funding to expand the existing Re-Connect services working to resolve relationship issues between young people and their families .

Population Groups whose needs have not been addressed as part of the Plan

People with alcohol and drug issues and people with mental disorders

The Plan identifies that problem alcohol or other drug use is one of the common causal factors for homelessness. The plan, however, does not indicate any initiatives directed at supporting the needs of this group. In Tasmania there are few crisis accommodation beds available for people who are intoxicated and a shortage of residential rehabilitation facilities. Tasmania Police report that often their only option is to place people who are intoxicated and homeless in remand, as there is no facility available that will accept them.

A similar gap exists for those who are homeless and experiencing a mental disorder but who do not have an identifiable mental illness, eg people who are suicidal. Tasmania Police report that psychiatric in-patient units will not admit this group, as they do not meet the definition of mental illness under the *Mental Health Act 1996* and the only option for Police is to place them in remand. Anecdotal evidence suggests that the primary concern of many of those seeking admission on this basis is their homelessness rather than their mental state.

If a person is experiencing a psychotic episode and is also intoxicated, departments of Emergency Medicine will not generally admit them due to concerns for the Occupational Health and Safety of staff and other patients. There is no alternative facility available for this group and they are often placed in remand.

The division of State Government agency responsibility for particular population groups and the lack of clarity as to whether these are health (mental health or alcohol or other drug) or housing issues has meant that to date solutions have not been forthcoming for these groups of people .

This remains a fundamental gap even with the integrated, whole of government approach offered by the Homelessness Plan, and needs to be prioritised for future action.

Improved Connections to Family and Community

Initiatives which could be considered as part of the implementation plan in relation to this objective include:

- Supporting organisations such as Reclink (with their range of sporting programs) and initiatives such as the Choir of High Hopes to expand their programs.

- Supporting the extension of programs like the Hobart City Council Street Worker program (whereby youth workers visit public spaces commonly used by homeless young people).
- Providing additional funding to community centres used by homeless people such as Community Central / Pulse/ Youth Arc to enable them to expand their range of activities and services offered (eg funding for outreach services).
- Provide funding to enable children of homeless families to remain engaged with schooling.

Building on Existing Strengths

The development of a plan for addressing homelessness with the injection of significant new funds provides the opportunity for innovation and new service responses. This is welcome. At the same time there is the danger that existing services (in this case the range of existing SAAP funded services) that have delivered quality services over a long period with limited resources, can be undervalued. While there are some new roles identified for existing services there is no indication as to the adequacy of resourcing that will be provided. Future funding for the Private Rental Tenancy Support Scheme and the Private Rental Support Service is uncertain.

As the implementation phase of the Plan is finalised we look forward to confirmation of the pivotal role provided by Tasmania's existing specialist homelessness providers.

The Tasmanian Homelessness Plan 2010-2014 has the potential to drive initiatives that will have a real impact on reducing homelessness and its effects on the lives of many Tasmanians. We commend the State Government and Housing Tasmania on its work in relation to the Plan to this point and look forward to the development of the implementation plan and further opportunities to contribute to policy making in this area.

Yours sincerely



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References

ACOSS *Submission to 'Which Way Home?: A new approach to homelessness* 2008

Anglicare Tasmania *Response to Which way home? A new approach to homelessness the Australian Government's Green Paper on Homelessness* 2008

Australian Government *The Road Home A National Approach to reducing Homelessness* 2008

Australia Social Inclusion Board *Social Inclusion How Australia is faring* 2010

SCHAA (Select Committee on Housing Affordability in Australia) 2998m *A good house is hard to find: Housing affordability in Australia*, The Senate Canberra 2008