Submission No. 53 (homelessness legislation)



Mission Australia's response to the House of Representatives Standing Committee on Family, Community, Housing and Youth

Inquiry into Homelessness Legislation

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Introduction and background information

Mission Australia is a national, not for profit organisation that works within the community, employment and training sectors. Our services provide pathways away from homelessness, pathways through a successful youth, pathways to strong families and happy, healthy children, pathways to skills and qualifications, and pathways to sustainable employment. In 2007-2008, Mission Australia's services provided assistance to 330,000 people across Australia.

We have been working for 150 years with people who are homeless, motivated by a vision for a fairer Australia where all people feel included and valued and enjoy the support of their families and communities to realise their potential. In 2007-08 Mission Australia supported 32,211 people experiencing or at risk of homelessness. We currently manage 23 Supported Accommodation Assistance Program (SAAP) services that include preventative, crisis and post crisis support. However, our approach is much broader than SAAP. Our homelessness initiatives include the provision of mental health services through our *Housing and Support Initiative* and *Personal Helpers and Mentors Program* which assist people with mental health issues to retain their housing. Mission Australia also delivers the *Reconnect* program for young people at risk of homelessness, and *Catalyst-Clemente*, a higher education program for socially excluded people, many of whom have experienced homelessness, with a focus on the humanities.

Mission Australia has developed an outcomes hierarchy (attached as Appendix 1) for our homelessness pathway, which reflects our understanding of homelessness as a complex issue that requires a multi-dimensional and cross-sectoral response.

Underpinning the provision of all our homelessness services is a fundamental respect for human dignity, and a commitment to building people's capacity to enjoy their entitlement to full membership of society. This translates into practice which sees the client placed at the centre of the case management cycle and decision-making process, and a shift away from the provision of crisis to prevention services. We recognise that homelessness is caused by a combination of individual and structural factors. We also recognise the importance of the 'consumer voice' approach and believe that service users should be engaged in determining what support they receive.

Mission Australia believes that the new legislative arrangements can contribute to the enhanced provision of services to homeless people in Australia by setting out the principles of service provision and standards which services should meet. Our recommendations against each of the Inquiry's Terms of Reference are set out below for the Committee's consideration.

Term of Reference 1

The principles that should underpin the provision of services to Australians who are homeless or at risk of homelessness

Recommendations

Mission Australia supports the idea of developing principles to underpin service provision. As these will reflect a clear direction to guide service delivery, they should therefore be enshrined in the legislation proper, rather than being contained in a registered legislative instrument. These principles should capture the following: fundamental beliefs about the inherent dignity and worth of people (rights-based principles); the essence of ethical, diligent and informed service delivery (service delivery principals); and an approach to service delivery that promotes systemic responses to homelessness (systemic principles).

Mission Australia recommends that mechanisms be built into the legislation to ensure that the principles are 'brought to life' and enacted by services working with the homeless.

Mission Australia endorses the principles contained in the schedule attaching to the Disability Services Act 1986 as a worthy basis upon which to build service delivery principles related to the dignified treatment of people who access in homelessness services (i.e. rights based principles). The rights contained within those principles are largely relevant to people who are homeless, given they, too, are vulnerable to unequal power relationships in the majority of their interactions with institutions, including those necessary to access housing and support services.

Mission Australia recommends, notwithstanding the above, that an additional service delivery principle be developed that recognises that, where appropriate, people who are homeless should be afforded special consideration with regard to compliance requirements that threaten their eligibility for or access to services. This is in recognition of the fact that the circumstances of people who are homeless pose additional challenges which may hinder or prevent them from participating in or complying with standard service delivery procedures.

Mission Australia supports others' calls for the prohibition of discrimination on the ground of socio-economic status, and recommends that relevant legislation such as the equal opportunity legislation be amended over a reasonable period of time to reflect this.

Rationale

Mission Australia believes that there are a number of principles which should inform service delivery. Some of these relate to fundamental beliefs about the inherent dignity and worth of people (rights based principles), others concern ethical, diligent and informed service delivery. In line with a key theme of this paper, principles that encourage a systemic response to homelessness are also critical.

Rights-based principles

With respect to the rights of people who are homeless, it is hard to find fault with the principles contained in the schedule attaching to the *Disability Services Act 1986*, except that

they are not contained in the Act itself, which diminishes their status and confers upon them less certitude than is ideal. With relatively minor alterations the principles in the *Disability Services Act 1986* would provide a decent basis to assure that people who are homeless or at risk of homelessness are treated with dignity and respect.

There is, however, perhaps one principle that is absent and particularly pertinent to people who are homeless, although it is noted that it is not purely related to service provision. This is discrimination on the grounds of socio-economic status. This concerns the special consideration that should be afforded to people who are homeless in recognition of their extreme socio-economic disadvantage and lack of access to private dwellings, which impacts on their ability to receive goods and services and to participate in the daily activities that many of us take for granted. Such special consideration would serve to protect people from harassment by the authorities for activities and behaviours (such as drinking, bathing, sleeping, and storing belongings in public spaces) that would not be considered illegal in the privacy of one's home, and are necessary by virtue of the fact that they have no place to call home (see for example, Lynch, 2003 and 2005, who has written extensively on this matter).

As Lynch details, this amounts to the criminalisation of people who are homeless, and discrimination based on housing status. To redress this situation, Mission Australia concurs with Lynch's proposal that discrimination on the ground of socio-economic status be prohibited. We note, however, that this concerns other legislation, registered legislative instruments and agreements that apply to areas beyond the homelessness service system.

Mission Australia endorses the principles contained in the schedule attaching to the Disability Services Act 1986 as a worthy basis upon which to build service delivery principles related to the dignified treatment of people who access in homelessness services (i.e. rights based principles). The rights contained within those principles are largely relevant to people who are homeless, given they, too, are vulnerable to unequal power relationships in the majority of their interactions with state institutions, including those necessary to access housing and support services.

Mission Australia recommends, notwithstanding the above, that an additional service delivery principle be developed that recognises that, where appropriate, people who are homeless should be afforded special consideration with regard to compliance requirements that threaten their eligibility for or access to services. This is in recognition of the fact that the circumstances of people who are homeless pose additional challenges which may hinder or prevent them from participating in or complying with standard service delivery procedures.

Mission Australia supports others' calls for the prohibition of discrimination on the ground of socio-economic status, and recommends that relevant legislation such as the equal opportunity legislation be amended over a reasonable period of time to reflect this.

Principles regarding ethical, diligent and informed service delivery, and systemic responses

Treating clients with dignity and respect is fundamental to effective service provision. There is no doubt that this is vital to achieving valued and valuable outcomes. However, in Mission Australia's experience, effective service provision involves more than this. It also calls for perseverance, a commitment to evidence-based practice, and a multi-systemic perspective on homelessness. This perspective highlights the (often but not always) multi-determined causes of homelessness, and the multi-disciplinary nature of the services that are often required to prevent or resolve homelessness. The complexity of homelessness demands

that linkages be made with a range of service providers to address the issues driving, reinforcing and arising from homelessness. In view of this, the principles outlined in this paper are premised upon the assumption that a case management process is the endorsed framework for organising service delivery. It is important to note, however, that this multi-systemic perspective should not override the primacy of clients' rights. Some people, for example, may simply wish, or simply need, to access relevant information particular to their needs; service intensity across the duration of a client's engagement with the system must vary in accordance with their needs at any point in time.

Mission Australia suggests that the principles underpinning the provision of services also be shaped so as to promote concerted, cross-sectoral effort, ideally to *prevent* homelessness. This means that systemic principles are required to support service providers to work beyond the boundaries of their organisation to find comprehensive solutions to people's needs.

The principles tabulated below are informed by the large body of national and international research concerning 'what works', with which the Committee is no doubt familiar. They are also based on primary research conducted by Mission Australia and our extensive practice experience and knowledge base, and are therefore reflective of the principles which drive Mission Australia's provision of homelessness services. Principles pertaining to rights are excluded from this list given they are discussed above, although it should be noted that these inform and dovetail with the principles identified below. An important feature of these principles is that they enfold the ideas contained throughout this submission. Some are constructed specifically to enhance the goals of the new legislation, and in particular those goals concerned with performance monitoring and garnering cross-institutional support. It is also worth noting that there are layers of activity required at structural levels to mobilise adequate support and enliven these principles. Appendix 2 of this submission was contained in Mission Australia's response to the Green Paper and articulates some of the practicalities associated with stimulating this activity. Because many of these are not strictly related to the new homelessness legislation they are not included in the body of this submission.

Implications more closely associated with the Terms of Reference of this Inquiry and the discussion within this paper are highlighted below. These are the issues associated with each principle which are likely to have a bearing on service standards, quality assurance processes, contractual arrangements, performance indicators, and so forth. Latter sections of this submission echo the issues identified below, and provide suggestions as to how these principles might be enacted and upheld through the development of standards and quality assurance processes.

Principles	Implications
Service delivery principles	
People who are homeless or at risk of homelessness are located firmly at the centre of the service system, the case management cycle and the decision-making process.	 Case management models should be underpinned by clearly articulated principles.
	 Organisations involved in the delivery of services should strive to ensure that their processes and systems are underpinned by 'reflexivity', a process which involves critical self-reflection, and the examination of submerged values and drivers that

	 may inadvertently shape service responses in ways that are more concerned with the convenience of the organisation, rather than the interests of the client. Placing the client at the centre of service delivery means that organisational structure and processes should cede to the best interests of the client. Organisational and decision-making processes should
	be clearly articulated and documented, and available to clients, funding bodies and partner organisations.
The design and delivery of services are directly informed by people who are homeless or at risk of homelessness.	• The voices of people who are homeless or at risk of homelessness should be amplified in all aspects of service design, development and delivery. Case management principles, best practice guidelines, and other quality assurance processes must work together to advance people's right not only to participate in decisions that affect them, but also to inform the development and review of the programs and services that affect them.
	 'Cause' advocacy and advocacy on behalf of individual clients should be directly influenced by clients' views. The creation of opportunities for input into these processes should be framed within policy and contractual documentation as a responsibility of service providers.
	• Similar to the above, opportunities must be created for clients to provide feedback on policy, processes and service delivery. With respect to service delivery, it should be incumbent upon services to develop, articulate and make available to clients the process by which they can provide feedback, and the process the organisation has in place to consider and, where appropriate, respond to feedback.
Services are responsive to goals that are established by and meaningful to the client; services take 'whole of life' (multi-systemic) approaches to achieving these goals where appropriate.	 Contracts and performance measures must recognise and accommodate the diverse circumstances, support needs and personal aspirations of individual clients, and therefore the varied service intensity and time frames required to meet client needs and support aspirations. Program indicators and evaluation frameworks should be constructed so as to appropriately value and measure a range of achievements that support people's journeys away from homelessness. In this regard, performance indicators should be developed with reference to the objectives and reporting requirements of other government agencies (in the areas of health; corrections; education and training, drug and alcohol services and so on) so that achievements that benefit these agencies can be captured and reported in ways that are meaningful to them. This will make visible to

	other relevant institutions the value of supporting the new legislation, and the strategies contained in the <i>White Paper</i> .
	 Multi-systemic approaches often require networking and linking with other government agencies and service delivery organisations, and negotiating across professional 'disciplines'. This requires particular skills other than those that might be typically expected of case workers, such as negotiation and conflict resolution skills. These should be recognised, professional development opportunities should be funded, and workers should be compensated appropriately for their multi-disciplinary skill sets. Clear arrangements among service systems in local areas may contribute to embedding this approach.
	• The value of the relationships and networks developed through inter-agency and inter- organisation cooperation and the time it takes to establish these should be formally recognised in funding contracts and performance reporting requirements.
	• Services should be able to expect the full cooperation and support of other agencies. The commitment of other agencies to reducing homelessness should be evident in employees' endeavours to support community workers in the homelessness sector to achieve client outcomes.
Services have a focus on building people's capacity. This equips people with the skills to address the underlying (individual) causes of homelessness, prevent homelessness and enjoy their entitlement to full membership of society.	 This reinforces the importance of uncapped service delivery, and performance measures attuned to the sometimes incremental nature of capability building.
Service responses are informed by and where possible based on credible research and evaluation.	• Continuing to build the homelessness sector's research literacy is critical. Sponsorship for research forums and conferences and 'scholarships' to enable practitioners from community organisations to attend such gatherings is essential to building the capacity of the sector. Such opportunities are particularly important for small and medium sized community organisations, which are less likely to have research and evaluation units within their organisations.
	 Related to the above, mechanisms for sharing and reporting on research and evaluation findings must be established. Of particular value to the sector might be information concerning methodologies for

longitudinal analysis of client outcomes and tools to support the collection of data.

 The commitment to evidence-based programs must not narrow services' responses to homelessness and impede innovation in service delivery by establishing over time a limited range of 'authorised' programs; services must be empowered to foster innovation by drawing on leading thinking and advice from within Australia and abroad, and synthesising this with local knowledge and practice knowledge and experience. Where accompanied by clearly articulated program logics and program theory, innovative pilot programs should be encouraged and funding made available to support these.

Systemic principles

Responding to homelessness requires a whole of community response; this includes the involvement of community, business, government agencies and homeless people.

- Service providers should be supported in their efforts to seek cross-institutional involvement, and in particular the involvement of those influential in the delivery of health services and job services; the inclusion of homelessness goals into the performance frameworks of relevant government departments would be invaluable.
- Funding support for advocacy and the development of local initiatives that involve business, community and government is critical. Funding for the development of initiatives should be conditional upon the development of evaluation frameworks, and clearly articulated strategies for drawing on the findings to further educate the community.
- Government must continue to lead the public debate on homelessness to dismantle hardened, misinformed community attitudes towards people who are homeless, and to ensure that the homelessness agenda remains a priority in the face of shifting policy landscapes. This reinforces the importance of making provision for the development of IT infrastructure, data collection and reporting mechanisms in the new legislation, and seeking ways to exert influence outside of the homelessness sector, which is already well-informed of the issues at hand.
- Introducing plans to reduce homelessness at the local level may be one way of encouraging whole of community responses. A clearly articulated local plan to end homelessness in the region could act to draw in a range of stakeholders and ensure a coordinated and integrated approach to need in the area. This could be facilitated in Australia by local governments or a collective of local governments at a regional level.

	Such an approach is in line with both the US, where long-term plans for local areas have had a positive effect, and the UK, where local authorities are required to develop action plans under the <i>Homelessness Act 2002</i> .		
Coordinated prevention of homelessness is paramount.	• Awareness-raising campaigns are critical to developing community understanding and supporting a range of service delivery agencies to identify those at risk of becoming homeless and enable them to take action. Public housing tenants who have multiple and complex needs, and repeatedly compromise the terms of their housing, deserve particular consideration here. There is a need to provide support such that their tenancies are not terminated as this would effectively see them fall into the cycle of homelessness, given the lack of other available options.		
	 Governmental processes must be designed to work in harmony to achieve the 'no wrong door' vision articulated in the White Paper, and to ensure that workers who are the 'first to know' are sufficiently informed and supported to take action. 		
Responses are guided by the overarching vision of the social inclusion of people who are homeless.	 This reinforces several of the principles above. Responses must be multi-dimensional since solving the issue of homelessness is about more than just housing; an element of capability-building is equally important. 		
	 Given the above, effective intergovernmental governance will be crucial to the development of systemic solutions that maximise people's participation in three key domains: economic, social and community life. 		
	 Both horizontal policy integration (integration across portfolios) and vertical policy integration (from federal to state to local government levels) will be key to enable the development and implementation of truly inclusive responses. 		
	 Client input into all levels of policy making is critical. Mechanisms to facilitate this must be an integral part of governance frameworks, policy and strategy consultation and development, program design, and service delivery. 		
	• This has significant implications for partnership development at the highest, most strategic levels, and at local levels. It emphasises the importance of networks, and raises implications for how these are nurtured, valued and accounted for within performance frameworks and contracts.		

Mission Australia supports the idea of developing principles to underpin service provision. As these will reflect a clear direction to guide service delivery, they should therefore be enshrined in the legislation proper, rather than being contained in a registered legislative instrument. These principles should capture the following: fundamental beliefs about the inherent dignity and worth of people (rights based principles); the essence of ethical, diligent and informed service delivery (service delivery principles); and an approach to service delivery that promotes systemic responses to homelessness (systemic principles).

Mission Australia recommends that mechanisms be built into the legislation to ensure that the principles are 'brought to life' and enacted by services working with the homeless.

Term of Reference 2

The scope of any legislation with respect to related government initiatives in the areas of social inclusion and rights

Recommendations

Mission Australia suggests that consideration be given to enshrining within the new legislation a staged approach to the establishment of a legally enforceable right to adequate housing, for all people who are homeless.

Mission Australia strongly recommends that provision be made in the legislation for substantial monitoring and accountability measures, via registered legislative instruments and accompanying policy that establishes measurable targets and performance indicators, and reporting obligations, to ensure that this right is progressively realised.

Rationale

The development of the new homelessness legislation presents an important opportunity for the Government to strengthen the protection of its citizens' human rights and, in doing so, to further its social inclusion agenda. As has been observed by others, social inclusion is largely dependent upon the realisation of people's rights (to non-discrimination and participation, for example). The issues of social inclusion and homelessness are intertwined; social exclusion can be a contributing factor to homelessness, and homelessness can also cause social exclusion. What is more straightforward, however, is that a human rights approach would remedy some of the underlying factors that cause both homelessness and social exclusion. It is therefore widely believed that upholding people's rights, in particular those outlined in the *International Covenant on Civil and Political Rights* (ICCPR) and the *International Covenant on Economic, Social and Cultural Rights* (ICESCR), is key to the Government's endeavours in both these policy areas (see for example Lynch, 2005 and Otto, 2002).

Having already ratified these treaties, the new legislation provides an ideal opportunity to incorporate an important obligation into domestic law which would not only support the aim of the *White Paper*, but would also serve the broader goals within the social inclusion agenda extremely well. Mission Australia therefore suggests that the Government consider enshrining within the new legislation an enforceable right to adequate housing. 'Adequate' housing might be taken to include consideration of notions such as security of tenure, cultural appropriateness, location in terms of accessibility to other fundamental services and infrastructure (such as public transport), and, of course, that it be both affordable and habitable. We recognise, however, the many practical difficulties associated with fulfilling this obligation, not the least of which is funding given that meeting the right to adequate housing first requires sufficient housing stock to be available. In view of this, the gradual enforcement of a right to housing might be both achievable, and a significant improvement on the current situation.

This approach is consistent with that undertaken in Scotland. Unlike the situation in England, Scotland has moved away from restricting access to housing to groups with 'priority' needs and has implemented a plan by which all homeless people will progressively have the right to permanent accommodation by 2012. France is also debating similar measures and in 2007 passed emergency legislation that aimed to establish a legally

enforceable right to housing. This reinforces recommendations (to follow) in this submission concerning the care which needs to be taken in crafting the key terms in the legislation.

Mission Australia suggests that consideration be given to enshrining within the new legislation a staged approach to the establishment of a legally enforceable right to adequate housing, for all people who are homeless.

Irrespective of whether the right to adequate housing is enshrined within the legislation, Mission Australia believes that accountability mechanisms are appropriate and indeed critical for the implementation of human rights. This is true for both the 'direct implementation' of human rights through the incorporation of various obligations into domestic law, and the less formal or indirect promotion of rights via policies and programs, accompanied by processes of inquiry and report, which has been Australian governments' past preference (see Otto, 2002). A strong argument could be made that accountability measures are perhaps more critical if the latter path is taken and judicial accountability mechanisms are therefore unavailable. Mission Australia therefore strongly recommends that provision be made in the legislation for substantial monitoring and accountability measures, via registered legislative instruments and accompanying policy.

Mission Australia strongly recommends that provision be made in the legislation for substantial monitoring and accountability measures, via registered legislative instruments and accompanying policy that establishes measurable targets and performance indicators, and reporting obligations, to ensure that this right is progressively realised.

Term of Reference 3

The role of legislation in improving the quality of services for people who are homeless or at risk of homelessness.

Recommendations

Mission Australia recommends that, in order to foster the provision of quality services to people who are homeless and at risk of homelessness, provisions be made in the new legislation for registered legislative instruments which set out expectations regarding quality and standards. This would enable service standards and quality assurance requirements to be enforceable, while also allowing for these to be updated in the future to reflect new developments in best practice. The Act should stipulate, however, that such changes should only be made in consultation with the Council on Homelessness and other key representatives and stakeholders.

Mission Australia recommends that a set of national standards be developed and incorporated into the legislation to assure the quality of service provision in the homelessness sector, and that a timeframe be established for the implementation of those standards across the sector.

Mission Australia recommends that the new legislation make provision for the inclusion of quality systems. This system should include measures to engage service users in determining what support they receive, regular evaluation and the establishment of a national accreditation agency and system to tie funding under the Act to compliance with national standards. Such an accreditation system should be phased in over a reasonable timeframe to allow services to meet areas for improvement.

Mission Australia recommends that the new legislation address requirements aimed at the continuous improvement of services offered to homeless people or those at risk of homelessness.

Mission Australia recommends that the legislation make provision for support and mentoring to funded organisations to ensure that all staff working in the sector are trained in quality standards and procedures.

Mission Australia recommends that a new client management system be developed as a means of ensuring that the national data collection system is supported by strong IT infrastructure. This will facilitate improved collection and analysis of statistics related to homelessness, and in turn will not only enable more detailed enumeration of the issue, but will also promote exploratory research that builds the sector's understanding of how to better respond to homelessness.

Mission Australia recommends that the new legislation set out a requirement for the implementation of a broader national data collection system, and that the data collection system and national research agenda be explicitly aligned with the aims and objectives of homelessness strategy in Australia.

Rationale

The new homelessness legislation has potential for improving the quality of homelessness service provision in a number of ways. This section sets out Mission Australia's approach to best assuring the provision of quality services. However, Mission Australia recognises that some of these measures will require substantial financial investment from both government and services. We therefore recommend that consideration be given to implementing quality standards and systems gradually, and that particular support be provided to smaller organisations in the sector.

Mission Australia has developed a *National Framework for Service Excellence* which is aimed at assuring service excellence and positive outcomes for clients. The strategies contained within this Framework can be broadly applied to the task of assuring quality service provision in the new homelessness legislation, since they are, like the new legislation, applicable to all clients irrespective of the model of service provision.

Such quality strategies enable services to have the supportive infrastructure and tools to effectively and efficiently deliver high-quality services to their clients, and to be able to grow, adapt and improve service delivery over time to meet the needs of service users now and in the future. An important part of this will be building in mechanisms for service users to have a voice in determining the support that is provided to them. Service users would be assured of their rights, supported in their responsibilities, and able to identify and celebrate their achievements.

The key means by which the new homelessness legislation can improve the quality of services for people who are homeless or at risk of homelessness include making provision for:

- 1. The development of national standards for service excellence;
- 2. The development of quality systems, including a requirement for regular evaluation and a system of accreditation required for funding eligibility;
- 3. The instigation of requirements to demonstrate continuous improvement;
- 4. Training, supporting and mentoring people working in the homelessness sector;
- 5. The development of appropriate technical infrastructure to support quality systems; and
- 6. A coordinated national data collection system and research agenda, to provide information on the quality of services offered and outcomes for those who are homeless or at risk of homelessness.

Mission Australia recommends that, in order to foster the provision of quality services to people who are homeless and at risk of homelessness, provisions be made in the new legislation for registered legislative instruments which set out expectations regarding quality and standards. This would enable service standards and quality assurance requirements to be enforceable, while also allowing for these to be updated in the future to reflect new developments in best practice. The Act should stipulate, however, that such changes should only be made in consultation with the Council on Homelessness and other key representatives and stakeholders.

National standards for service excellence

The development of national standards has been discussed for some time in the homelessness sector in Australia. The SAAP IV evaluation for example noted that:

A major task for the future will be to create a set of common and agreed service standards across the jurisdictions and departments to ensure effective integration and coordination of service provision. Clear standards and performance measures at the level of service delivery are required. These need to be linked with the national plan, policy directions and targets for achievement. (ECP, 2004, p.163)

There are a number of benefits of developing quality standards. The following have been derived from papers that address standards in the disability sector, but these could equally be applied to the homelessness sector. Potential benefits of developing a national set of standards include:

- Ensuring all services in the sector meet, at a minimum, the standards set down;
- Making the assessment of quality more objective, contextual and measurable;
- Treating all service providers equally (in the government and non-government sectors);
- Linking accreditation to funding;
- Reducing government intervention in the day to day operation of services;
- Helping services to continue to improve (FaHCSIA, 2008, p.1);
- Setting out requirements in an immediately accessible form;
- Reducing uncertainty for potential complainants and respondents by providing information that authoritatively and definitively sets out the necessary steps for compliance with requirements;
- Providing timetables for compliance with requirements;
- Encouraging or requiring the adoption of action plans to meet deadlines;
- Allowing input from interested parties; and
- Providing an opportunity for the relationship between the standards and other relevant sources of law to be specified. (HREOC, 1993).

Standards refer to benchmarked best practices in core aspects of service delivery and service management. They do not determine the model of service provision but ensure the client is offered a high quality of service from referral through to exit, across different models and types of service. Mission Australia recommends developing a single integrated set of excellence standards for homelessness services. The standards should be developed in conjunction with specialist service providers as well as related service systems, and should include:

- *Client-related standards*, including client rights and responsibilities, client participation and decision-making, child protection, working with vulnerable persons and others;
- *Quality management standards,* including valuing and being responsive to client feedback, complaints management, privacy and information management, risk management, data management, networking and community relationships;
- Case management standards that map the case management workflow in terms of referral, intake, offer of service, assessment, case coordination, exit planning and review.
- Governance arrangements, including financial management, OHS, HR.

Within the construct of these standards, services should be encouraged and supported to work with creativity and innovation.

Mission Australia recommends that a set of national standards be developed and incorporated into the legislation to assure the quality of service provision in the

homelessness sector, and that a timeframe be established for the implementation of those standards across the sector.

Quality systems

Mission Australia recommends that quality systems are implemented to support the development of work systems and processes that enable excellence in service provision and continuous improvement.

Such systems may include:

- 1. requirements for service planning and development.
- 2. benchmarking best practice in homelessness service delivery, to guide the provision of quality services across the sector.
- 3. the development of core case management principles for working with clients in the homeless sector. A requirement to engage service users in the development of their own case management plans is generally considered good practice and could be referred to in the legislation.
- 4. regular evaluation to ensure that outcomes for clients are being met.

The *SAAP Act* requires that the program be evaluated regularly, and no less than every five years. This has the benefit of enabling regular ascertainment of the progress towards achieving goals for homelessness in Australia. The new legislation will pertain to a broader range of programs and a national evaluation would be a different undertaking to those made under the *SAAP Act*. It would rely on appropriate IT infrastructure and data collection systems as outlined in the following sections. Consideration would also have to be given to accountability in conducting thorough evaluations and the need to have quarantined funding for services to enable evaluations to be undertaken.

5. implementing a national system of accreditation such that services are required to show evidence that they meet the national standards before they receive government funding under the Act.

The accreditation body should be specifically established to work within the homelessness sector. The application of national standards will need to be understood and interpreted in context, which will require the accreditation agency to be well versed in the sector and the provision of homeless services. The accreditation agency should also have a role in supporting and mentoring organisations working in the sector to understand the quality requirements of the legislation and assist them in implementing them. The accreditation system should be phased in over a reasonable timeframe to allow services to meet areas for improvement, acknowledging the difficulties associated with continuing to meet the needs of clients at the same time as improving quality systems, particularly for smaller organisations.

Mission Australia recommends that the new legislation make provision for the inclusion of quality systems. This system should include measures to engage service users in determining what support they receive, requirements for regular evaluation and the establishment of a national accreditation agency and system to tie funding under the Act to compliance with national standards. Such an accreditation system should be phased in over a reasonable timeframe to allow services to meet areas for improvement.

Continuous improvement

The implementation of continuous improvement strategies will assist agencies working with homeless clients to increase their ability to meet and exceed the requirements of the national standards. Continuous improvement requires action based on a systematic analysis of data and information gained via quality systems.

Structured review and planning processes would enable strategic planning around meeting social and community needs, reviewing and increasing service impact, and improving support and resources to services. At a service level, it would allow for the review and enhancement of policies and systems, organisational and service procedures, and service models, workflow and delivery. It would also allow services to adapt and change and thereby cater to changing community needs, as improvement is often based on the capacity to adapt.

Mission Australia recommends that the new legislation address requirements aimed at the continuous improvement of services offered to homeless people or those at risk of homelessness.

People

The staff of organisations in the homelessness sector will require training, support and ongoing mentoring in understanding and implementing the quality requirements of the new legislation. This is particularly true of smaller organisations which may not have sufficient existing infrastructure to implement quality systems at present.

Mission Australia recommends that the legislation make provision for support and mentoring to funded organisations to ensure that all staff working in the sector are trained in quality standards and procedures.

Infrastructure

Mission Australia's submission to the *Green Paper* recommended the retention and expansion of a national data collection system (see below), based on a client management system that would enable data collection to be made as a by-product of service delivery. A strong information technology environment, including a client management system, is required to support a new service system and ensure that appropriate data can be captured. An important part of this system would involve capturing the views of service users on their case management plan and the support that is provided to them.

There is merit in building on the principles and design of the SAAP NDC, and additionally developing a client management system for use in services working with homeless or at risk clients. This would enable data collection as by-product of service delivery. This system should also be developed so that it can be used across systems and services to reduce the fragmentation of case management.

Mission Australia recommends that a new client management system be developed as a means of ensuring that the national data collection system is supported by strong IT infrastructure. This will facilitate improved collection and analysis of statistics related to homelessness, and in turn will not only enable more detailed enumeration of the issue, but will also promote exploratory research that builds the sector's understanding of how to better respond to homelessness.

National data collection system and research agenda

A national data collection system will be, as it has in the past, integral to review of the performance of the system and the quality of processes and services. A strength of the SAAP data collection was that it provided a nationally consistent data set, not matched in other homelessness programs. Under the new arrangements, measurement of outcomes can be established to inform progress against social inclusion indicators and contribute to ongoing systems reform.

A national research agenda for homelessness will also assist in the provision of quality services to homeless people in Australia. The national data collection system should also lead and be informed by a coordinated national research agenda to enhance the evidence base. More needs to be known about what happens to people who use services both in the short term and the longer term, and the costs associated with homelessness service provision. This could be informed by a similar process to that which was conducted in the United States (NAEH, 2007). The system can continue to be refined to ensure it is appropriately orientated to long term outcomes.

A coordinated research agenda will enable national review of the circumstances of homelessness in Australia and more effectively support policy and program development. (ECP, 2004, p.184)

It is noted that Minister Plibersek announced, on August 5th 2009, \$11.4 million in funding for a Homelessness Research Agenda. It is recommended that the data collection system and national research agenda be explicitly aligned with the aims and objectives of homelessness strategy in Australia.

Mission Australia recommends that the new legislation set out a requirement for the implementation of a broader national data collection system, and that the data collection system and national research agenda be explicitly aligned with the aims and objectives of homelessness strategy in Australia.

Terms of Reference 4 and 5:

The effectiveness of existing legislation and regulations governing homelessness services in Australia and overseas; and

The applicability of existing legislative and regulatory models used in other community service systems, such as disability services, to the homelessness sector

This section of the submission addresses Terms of Reference 4 and 5.

Recommendations

Mission Australia strongly supports the establishment of Commonwealth legislation that deals specifically with the issue of homelessness. Mission Australia believes that this is an important symbolic step forward in the collective effort to end homelessness, and will be an influential and useful tool in improving service delivery and outcomes.

Mission Australia affirms the Government's view that 'reducing homelessness is everyone's responsibility', and notes that a key challenge in creating the new legislation will be to influence the activities and administrative processes of other sectors and institutions which sit outside the circle of direct service provision, but nevertheless have a bearing on and a role to play in reducing homelessness. To this end, Mission Australia recommends that a course of action be established to address potential barriers to the aim and objectives of the homelessness legislation, and to identify concordant goals and develop mutually supportive processes to enhance the achievement of these. This would foster cross-institutional support for the new homelessness legislation.

Mission Australia suggests that the definition of 'homeless' currently contained in the Supported Accommodation Assistance Act 1994 be widened and more fully articulated to better reflect the widely accepted primary, secondary and tertiary definitions of homelessness. In addition, and in support of the White Paper's commitment to eliminating 'exits into homelessness' the new legislation should provide additional clarity around who is considered homeless and how this is determined.

Mission Australia suggests that key terms within the Act be examined and re-phrased where necessary to ensure a move away from 'a culture of 'gate-keeping' to a 'culture of inclusion' (NSW Ombudsman, 2004, p. 14), and to prevent global or group exclusions, and the exclusion of challenging clients.

Mission Australia believes that the new legislation provides an important opportunity to articulate a more expansive, optimistic and ambitious goal for addressing homelessness in Australia. We suggest that an appropriate aim for the new legislation is to promote the social inclusion of those who are homeless or at risk of homelessness, by ensuring the provision of support and accommodation that promotes human dignity and autonomy, is appropriate to their needs, and does not limit or impede their capacity to achieve their potential.

Mission Australia strongly recommends that the principles that are to underpin service delivery and any service standards that may be developed should be enshrined in the

legislation proper, rather than contained within a legislative instrument. This would accord them the stature and weight that they are due, and ensure that they are subject to scrutiny and the public process of debate if they are to be changed in the future.

Mission Australia suggests that bodies charged with driving reform and monitoring the implementation of the White Paper, together with cross-government coordinating committees responsible for developing and implementing strategic frameworks, be formally constituted and governed, and that they be required to report on their progress and contributions to the achievement of the goals of the White Paper.

Mission Australia suggests that the Council on Homelessness should have the authority to oversee the inclusion of homelessness goals into the performance frameworks of relevant government departments, and to ensure that the current practices of relevant institutions which impact both directly and indirectly on homelessness are benchmarked. It should also be influential in the setting of goals against these benchmarks, and monitor achievements against these goals through the provision of progress reports.

Rationale

Mission Australia concurs with the general sentiment of the homelessness sector that the *Supported Accommodation Assistance Act 1994* has been an important piece of legislation in placing 'people experiencing homelessness into the legislative record of our nation' and has served 'both a symbolic and practical purpose' (Wright-Howie, 2008, p. 21).

However, the Supported Accommodation Assistance Act is comparatively narrow in intent, aimed principally at establishing and providing funding arrangements for the SAAP program. As noted by Wright-Howie (2008), the legislation 'only refers to clients of one programmatic service delivery response and not the rights of people who are homeless more broadly.' Mission Australia believes that the new homelessness legislation should be broader-based. Unlike the Supported Accommodation Assistance Act, the new homelessness legislation will not describe a single program. It must therefore be broad enough to cover the principles and standards of all homelessness programs and services, and ideally it should inform the delivery of mainstream services with which people who are homeless come into contact. The Act should at once be both clear and encompassing: it should state the principles upon which homeless service provision should be built, offer clarity to service providers in contact with homeless people, and ensure that high standards regarding service delivery for people who are homeless are upheld. Critically, care must be taken to ensure that the new legislation and accompanying policy is not subsumed into future general housing or social policy in order to assure the continued prominence of homelessness as a social issue. This will ensure that those who are homeless or at risk of homelessness are the focus of service provision, and that services do not operate in isolation from other sectors or work with clients only to remedy their housing issues. This is crucial to the achievement of the White Paper's goals, since the provision of housing alone does not address the problem of homelessness.

As others have commented (see Greenhalgh et al, 2004), Australia is not the first or only jurisdiction to develop specific homelessness legislation. Other jurisdictions have pursued this path, with varying degrees of success. Mission Australia recognises that the implementation of the new homelessness legislation will take place within the broader legal, administrative and practical context and that, as with other pieces of legislation, this context can sometimes interfere with the operation and achievement of the objects enshrined in an

Act. To this end, much can be learned by the set-backs, difficulties and weaknesses associated not only with international pieces of homelessness legislation, but other Australian social policy initiatives enshrined in legislation, such as the *Disability Services Act 1986* and the now superseded *Affirmative Action (Equal Employment Opportunity for Women) Act 1986*.

The *Disability Services Act 1986* is pertinent because it contains principles, objectives and service standards that the *White Paper* suggests be drawn on to inform the new homelessness service standards and the principles that will underpin service delivery. It is useful to reflect on the affirmative action legislation because it is one of the few examples of the type of policy and legislative action that might be required to achieve the Government's social inclusion agenda, and it is widely regarded in critical and academic circles as a failure (see for example, Thornton, 2001 and Bacchi, 2000). It is commonly agreed that social inclusion is not the obverse of social exclusion, and that the policies required to effect inclusion are markedly different than those required to prevent exclusion (Silver, 2009). Similar to the current thinking on homelessness, affirmative action was a policy which recognised that equalising the opportunities for women and improving their status required a change in the culture of Australian society, and *proactive measures to be taken by all*, especially those in decision-making positions and in control of resources.

The key lessons to be learned from both these Australian Commonwealth Acts concern accusations about their lack of 'teeth' (particularly in the case of affirmative action) and the dilution of their impact at ground level despite the strong sentiments and ideals expressed in the governing legislation (for reflections on the effectiveness of the *Disability Services Act 1986* see Einfeld, 1997, and Ward, 2006).

With the Commonwealth disability legislation, it was found by some at ground level that despite its bold declarations 'when the going gets tough the vision is in danger of compromise' (Ward, 2006, p. 254) and that it is possible for worthy standards to become 'worthless pieces of paper' (Einfeld, 1997) that have little impact on the experiences, interests and lives of those the legislation intends to protect and serve. In the UK, it has been observed that during the 1990s the homelessness legislation increased the number of housing claimants and put untenable pressure on the government which responded by reducing these numbers through the strategic application of the definitions within the Act and the use of discretionary tests to rule out large numbers of people eligible for support (see Cowan, 1998).

The Australian affirmative action legislation was hampered by the loosening of regulatory measures and a shift towards voluntarism, the removal of goals and targets against which companies' progress could be measured, and a faltering commitment to the collection of statistics that would yield insight into pockets of particular concern (Thornton, 2001, and Bacchi, 2000).

These weaknesses have clear implications for the development and implementation of the new homelessness legislation. The overriding lesson is that while definitional clarity and the intent of the legislation is critical, the new legislation must be constructed so that it has a meaningful impact on what people *do*. Therefore it must be able to hold relevant bodies to account. This suggests that what is needed to really make a dent in the number of people who are homeless is a piece of legislation that contains monitoring and reporting mechanisms that buttress its aim and objects. Mission Australia suggests that the following considerations and recommended actions will help to strengthen the excellent base

provided by the existing *Supported Accommodation Assistance Act 1994,* draw on the best aspects of other relevant legislation, and avoid their weaknesses.

Mission Australia strongly supports the establishment of Commonwealth legislation that deals specifically with the issue of homelessness. Mission Australia believes that this is an important symbolic step forward in the collective effort to end homelessness, and will be an influential and useful tool in improving service delivery and outcomes.

Mission Australia affirms the Government's view that 'reducing homelessness is everyone's responsibility', and notes that a key challenge in creating the new legislation will be to influence the activities and administrative processes of other sectors and institutions which sit outside the circle of direct service provision, but nevertheless have a bearing on and a role to play in reducing homelessness. To this end, Mission Australia recommends that a course of action be established to address potential barriers to the aim and objects of the homelessness legislation, and to identify concordant goals and develop mutually supportive processes to enhance the achievement of these. This would foster cross-institutional support for the new homelessness legislation. An excellent example of formal, cross-institutional cooperation is the US McKinney-Vento Homeless Education Assistance Improvements Act 2001 which seeks to ensure that the educational needs of children and young people who are homeless are met in accordance with the universal No Child Left Behind policy.

Defining homelessness

Definitional clarity within the new homelessness legislation is critical in order to prevent the misinterpretation of the terms upon which the fulcrum of differential treatment will rest (such as eligibility criteria, and the definition of 'homelessness' itself). This will prevent pressure being applied to agencies to find ways to relieve service delivery pressures and meet performance measures when demands on services are particularly onerous, as outlined by Cowan (1998, see above).

Regarding the above, Mission Australia recommends that the definition of 'homeless' currently contained in the *Supported Accommodation Assistance Act 1994* be strengthened and more fully articulated to better reflect the widely accepted primary, secondary and tertiary definitions of homelessness. In addition, and in support of the *White Paper's* commitment to eliminating 'exits into homelessness', the new legislation should provide additional clarity around who is considered homeless and how this is determined, in particular those groups 'at imminent risk' of becoming homeless. This will help to reduce the incidence of 'hidden homelessness' and improve the accuracy of statistics regarding access to and the effectiveness of services. To this end, it is vital that the definition encompass groups 'at risk' of homelessness, to legitimate funding and support for services and programs primarily concerned with prevention. This would retain an important feature of the current *SAAP Act*, which recognises the various causes or pathways into homelessness. We note that these points may have implications for the national data collection under the new arrangements.

Mission Australia suggests that the definition of 'homeless' currently contained in the Supported Accommodation Assistance Act 1994 be widened and more fully articulated to better reflect the widely accepted primary, secondary and tertiary definitions of homelessness. In addition, and in support of the White Paper's commitment to eliminating 'exits into homelessness' the new legislation should provide additional clarity around who is considered homeless and how this is determined.

Preventing the exclusion of challenging clients

To ensure a move away from 'a culture of 'gate-keeping' to a culture of inclusion' (NSW Ombudsman, 2004, p. 14) the key terms within the Act must be examined to prevent global or group exclusions, and to prevent the exclusion of challenging clients. Groups that are particularly vulnerable to value judgements might include people being released from hospitals and the juvenile and adult correctional systems, and people exiting drug and alcohol rehabilitation programs. Discretionary matters would include determinations regarding 'priority need'. Situations where community workers are required to make judgements regarding the motivation of clients should also be avoided.

Mission Australia suggests that key terms within the Act be examined and re-phrased where necessary to ensure a move away from 'a culture of 'gate-keeping' to a culture of inclusion' (NSW Ombudsman, 2004, p. 14), and to prevent global or group exclusions, and the exclusion of challenging clients.

Legislative aim

Mission Australia believes that the new legislation provides an important opportunity to articulate a more expansive, optimistic and ambitious goal for addressing homelessness in Australia than that which is currently contained in the Supported Accommodation Assistance Act 1994. The significance of this can be seen in Ward's reflections on the impact of the Disability Services Act 1986 who writes that 'legislating a clearly articulated policy direction encouraged, emboldened and inspired many change agents' (Ward, 2006, p. 254). A more ambitious vision would not only better capture the spirit and intent of the vision contained in the White Paper but as the most authoritative form of policy it would also play an important role in achieving cultural change and fostering the type of society envisaged in which homelessness is unacceptable. In Mission Australia's experience, such a vision is warranted since both research and practice wisdom shows that with appropriate service models and adequate resources even chronic homelessness is eminently resolvable. We suggest that an appropriate aim for the new legislation is to promote the social inclusion of those who are homeless or at risk of homelessness, by ensuring the provision of support and accommodation that promotes human dignity and autonomy, is appropriate to their needs, and does not limit or impede their capacity to achieve their potential.

Mission Australia believes that the new legislation provides an important opportunity to articulate a more expansive, optimistic and ambitious goal for addressing homelessness in Australia. We suggest that an appropriate aim for the new legislation is for everybody in our community to enjoy accommodation that is stable and secure, promotes human dignity and autonomy, is appropriate to their needs, and does not limit or impede their capacity to achieve their potential.

Enshrining the principles

The principles that are to underpin service delivery and any service standards that may be developed should be enshrined in the legislation proper, rather than contained within a legislative instrument. This would accord them the stature and weight that they are due, and render them less amenable to change should the policy landscape shift and they become subject to partisan politics.

Mission Australia strongly recommends that the principles that are to underpin service delivery and any service standards that may be developed should be enshrined in the legislation proper, rather than contained within a legislative instrument. This would accord them the stature and weight that they are due, and ensure that they are subject to scrutiny and the public process of debate if they are to be changed in the future.

Framework and advisory bodies

The Act should incorporate into the legislation provisions for the establishment of a framework and advisory body that will work in concert to ensure that all relevant institutions are able to locate themselves organisationally vis a vis the new homelessness legislation, and are fully informed about the possibilities, processes and expectations of action. Information arising from the work of this body in identifying structural gaps and barriers needs to be passed on to intergovernmental groups to inform the development of systemic solutions. Relevant institutions may include not only those responsible directly for service delivery, but also personnel with post-release planning responsibilities in government and statutory bodies, social security workers, members of the police, legal advice clinics, health workers, community corrections officers, media advisors, workers in the employment support sector, and so on.

Such a framework should also facilitate and encourage strategic alliances and dialogue across institutions that perhaps do not usually work together, and endorse and reward this activity at the most senior levels. As Ward notes, reflecting again on the subject of disability support services, 'leadership is rarely where you expect to find it. It is important to locate and nurture principled allies, wherever they may be' because 'we need every one of them' (Ward, 2006, p. 254).

Mission Australia suggests that bodies charged with driving reform and monitoring the implementation of the White Paper, together with cross-government coordinating committees responsible for developing and implementing strategic frameworks, be formally constituted and governed, and that they be required to report on their progress and contributions to the achievement of the goals of the White Paper.

Monitoring the implementation

Bodies charged with driving reform and monitoring the implementation of the *White Paper*, together with cross-government coordinating committees responsible for developing and implementing strategic frameworks, have particular responsibilities with regard to the measures identified above. It is critical that these committees be formally constituted and governed, and that they be required to report on their progress and contributions – and the progress and contributions of the agencies for which they are responsible – to the achievement of the vision of the *White Paper*. To support this, it would be ideal if the Council on Homelessness had the authority to oversee the inclusion of homelessness goals into the performance frameworks of relevant government departments, and to ensure that the current practices of relevant institutions which impact both directly and indirectly on homelessness are benchmarked. It would also be desirable for the Council should have the authority to reject unsatisfactory reports on progress, and it must have a level of standing within and across government that ensures that any best practice commendations that it might award are meaningful and valued.

Mission Australia suggests that the Council on Homelessness should have the authority to oversee the inclusion of homelessness goals into the performance frameworks of relevant government departments, and to ensure that the current practices of relevant institutions which impact both directly and indirectly on homelessness are benchmarked. It should also be influential in the setting of goals against these benchmarks, and monitor achievements against these goals through the provision of progress reports.

In summary, there are other institutional levers for reducing homelessness, most notably within the social security system, the labour market, and institutions responsible for setting minimum wages and providing affordable housing. It is important that where possible the new legislation not only focus on impacting at the individual level, but also the systemic and structural levels. As Braithwaite and Bush (1998) detail in their review of Australia's affirmative action legislation, society's major institutions sometimes work 'in concert' to entrench disadvantage rather than alleviate it. The challenge, then, is to get these institutions working in concert to address disadvantage. Braithwaite and Bush (1998) also note that new policy measures work best when they are enmeshed with the objectives and practices of other institutions, because they then become less 'readily dismantled'. In view of this, identifying ways to embed the implementation of the White Paper within other institutions that have a bearing on its success (via mechanisms such as those listed above) is critical. Equally important is the need to make explicit the benefits these institutions will gain from supporting the new homelessness legislation. In drafting the new legislation and developing the reporting, monitoring, compliance, educative and incentive systems that will sit alongside it, consideration should therefore be given to ways in which the benefits to other institutions might also be captured and reported, so that they see the value in supporting it.

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Appendix 1: Mission Australia's Outcomes Hierarchy (Pathways away from homelessness)

See following page.



OUTCOMES HIERARCHY: PATHWAYS AWAY FROM HOMELESSNESS



Appendix 2: Systemic principles and levels of responsibility Extract from Mission Australia's *Green Paper* submission

See following page.

Figure 3	Facilitating Systems	Reform:	Systemic Principles &	Levels of Responsibility
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	Client at the Centre	Clients Socially	Whole of	Equity	Evidence Based	Appropriate	Dynamic
		Included	Community			Resourcing	Responsive System
			Response				
Structural Level: National:	Leadership Establish continuum of Housing/Accommodation Develop individual client funding system and monitor quality Establish continuum of support model Develop IT Infrastructure COAG Governance	Establish Social Inclusion Measures Embed measures in Commonwealth contracts/agreements Facilitate incentive system for Interagency cooperation at the Commonwealth level National Interagency Governance Groups	Development and delivery of broad publicity campaigns and prevention strategies based on social inclusion measures Establish an incentive-based strategies for community members and business Corporate Responsibility Index	Development of a National Plan to facilitate the implementation of the housing/accommodation, support model Implement the funding model through NAHA Develop & monitor national service standards	Establishment of a National Research Agenda IT Infrastructure to manage client information, coordinate referrals and record data Evaluation of client outcomes and system effectiveness & efficiency National Advisory Committee on Homelessness	Identification of funds for the evaluation of the broader system Resources for the development and implementation of the IT System Resource base for the prevention, housing/accommodation and support services continuum	Ensure that systems are regularly reviewed and changes made as required Ensure portability of the system infrastructure, funding and contracts Individual funding model to recognise the level of need for each client. Lead phased system implementation
State/	Leadership	Establish Social Inclusion	Engage major corporates in	Matching and application of	Undertake specific evaluation	Appropriate resource	Flexible funding to be available
Territory:	Ensure housing continuum coverage for each region Administer funding for housing/accommodation and Area support centres Monitor quality of services and outcomes Decision making via COAG	Measures Embed measures in state/territory contracts/agreements Link to interagency incentives system for state based services Analyse service performance	states/territories Engage local government and formalise linkages Broaden volunteer support programs Link prevention messages to other relevant initiatives	funding as agreed through NAHA Implementation of the housing/accommodation aspects of the National Plan. Support timely access to all state/territory services as need predicts in each area	projects in a range of areas to identify critical success factors for specific applications (i.e. rural & remote) Analysis and reporting of contract data on a state/territory level State/Territory Advisory Committees on Homelessness	allocation to each region based on locational disadvantage with weighting for rural & remote (matched) Enhanced employment packages for sector workers Resources for Local prevention initiatives	for each area based on locational disadvantage Coordinate local operational implementation in each area Lead local changes and services enhancements as required
		State/Territory Interagency Governance Groups					
Area Service Level: (Non-government agencies)	Lobby for Area needs & resolve issues as they arise Provide staff training & induction for the client case management Manage quality of service delivery	Engage local business and community members Develop partnerships with local services Facilitate interagency process and incentive system	Convene Area Representative Board Develop partnerships with local government, recreation/sporting groups Coordinate regional community events to raise	Lobby government for improved access to services as required Develop strategies for each area in consultation with Area Representative Board Implement requirements of	Ensure that staff have competencies in using the IT system to enter and export data Participation in area specific evaluation processes Data analysis and local	Engage with local business to attract additional funding Engage with local communities to attract specific skill areas to support area work Attract grant funding for specific projects	Contribute to the evolution of the system by identifying service issues Implement changes to the service model as required Ensure accurate application of funding based on area and
	donvoly		awareness and build cohesive community	National Plan	continuous improvement		client need
Individual Worker Level:	Follow relevant policies and procedures Advocate on behalf of clients	Develop awareness of local services/resources Develop local relationships	Look to facilitate local networks to assist client's integration into the community.	Escalate issues relating to service barriers/gaps, waiting lists	Input of accurate data in line with documented policies and procedures	Identify possible funding sources particular to client need	Manage up issues to the regional level related to service barriers, service gaps and other issues with client access
20001.	Access services relevant to client need	with services/community groups	Engage individual volunteers to support various case plan goals	Explore innovative responses and strategies to access required services/resources	Support client involvement in specific evaluation processes Documenting innovative	Efficient use of client funds and flexible funds Efficient use of services and other local resources	Ensure the accurate application of funding based on guidelines and client need
Client	Relationships with clients Input into the establishment of	Input into State/Territory	Input into the process of	Input into the development of	service approaches	Input into the funding	Input into all major review
Client Level:	housing and support continuums	Interagency Governance Groups	developing community networks	the National Plan Consumer Feedback	Advisory Committees Consumer Feedback	framework Consumer Feedback	consumer Feedback
	Consumer Feedback	Peer Support	Peer Support Program				
		Consumer Feedback	Consumer Feedback				