



5th September 2024

Social and Affordable Housing Unit,
Housing Division,
Treasury.

housing@treasury.gov.au

To the Housing Division

Re: Draft amendments to the Housing Investment Mandate Direction 2018

Thank you for the opportunity to contribute to the formulation of the new draft amendments to the *Housing Investment Mandate Direction 2018*. We welcome the additional funding to the National Housing Infrastructure Facility (NHIF) to support crisis and transitional housing for women, children and youth experiencing family domestic violence, homelessness, or risk of homelessness.

Southern Youth and Family Services (SYFS) provides services to children, young people, adults, and families who are disadvantaged, vulnerable, homeless, or at risk of homelessness, in the Illawarra Shoalhaven and Southern districts of New South Wales. We are seeing the consequences of the housing crisis every day in our work with these vulnerable populations. In this submission, we address the key questions issued in the Policy Fact Sheet based on more than 40 years of experience in the youth homelessness and housing sector.

First, we provide some background information on Southern Youth and Family Services. The submission then follows the question structure of the Fact Sheet.

About Southern Youth and Family Services

Southern Youth and Family Services (SYFS) provides services to children, young people, adults, and families in the Illawarra Shoalhaven and Southern districts of New South Wales. The organisation was established in 1977, when a group of people in Wollongong, who were concerned about homelessness, and young people came together to establish a youth refuge. It opened its first service in January 1979 and has since grown to over 200 employees and 47 services. These services include social housing (approximately 220 properties), transitional housing and supported accommodation, outreach, early intervention, family relationship support, Out of Home Care residential and outreach support, financial and material assistance, skill development, psycho-social support, advocacy, information and referral, health and personal care, education (including a specific program for Aboriginal school students), training, and pre-employment support, community development/neighbourhood centre, a mobile preschool, and a multicultural playgroup. In 2023/24 SYFS provided substantial support to 5,553 young people and 3,285 families. In addition, we provided 14,928 instances of one-off or casual support. 29 per cent of SYFS clients were Aboriginal and 15 per cent were non-English speaking. 11 per cent had had contact with the criminal justice system. Our programs are funded through several Commonwealth and State funding agreements, philanthropic donations, and social enterprises.



Southern Youth and Family Services has extensive experience providing support to unaccompanied children and young people who are homeless or at risk of homelessness. We therefore concentrate in this submission on the issue of youth homelessness, which is often neglected in homelessness policy.

What are the merits of targeting additional funding towards crisis and transitional accommodation as part of the broader mix of acute and social housing?

Homelessness services are facing growing challenges, with soaring demand, inadequate funding, and a lack of exit options placing pressure on short-term and emergency beds. In 2021-22, homelessness services in New South Wales were unable to assist 71,962 people who came to them for help.¹ In the NSW youth homelessness sector, we know that one in two unaccompanied children and young people who ask for an emergency accommodation bed for the night will be turned away.

Short-term crisis accommodation is a critical part of the homelessness services system and crisis services need to be available, effective, and well-resourced. But these services work best when there are adequate exit points from them. Young people's housing needs change over time and there needs to be tailored supports and housing options for them. Where it is neither safe, nor appropriate for young people to return to live with their family, or supportive relative, they need longer-term accommodation with support through a range of housing models. The lack of transitional medium to long-term housing for young people is dire and should be a major focus for the amendments. In NSW there is a dire lack of medium to long term supported, or semi-supported accommodation across the state, especially in regional and country areas. For example, across the Southern Tablelands and Southern NSW there is not one medium term or transitional service for young people. This means that young people cannot exit crisis services, leading to blockages in the system. In rural areas there are also no social housing exit options. We support the transitional and medium term accommodation projects be prioritised.

The NHIF youth housing grants should not be allocated on a per capita basis but be at least geographically balanced between capital cities and regional areas if not prioritising the regional areas.

Are the definitions for crisis and transitional accommodation in the draft investment Mandate amendments appropriate, and separately, are the definitions of the cohorts of woman and children, and youth appropriate?

The definition of youth is appropriate and a significant cohort to be included to these amendments. The housing and homelessness need and priorities of young people have not been adequately identified or addressed within the proposed National Housing and Homelessness Plan, the National Plan to End Violence Against Women and Children 2022-2032, or the National Framework for Protecting Australia's Children 2021 – 31. Unaccompanied children often slip through the gaps in the child protection system and end up cycling through youth refuges, couch surfing, and staying in unsafe or inappropriate accommodation without parental or parent-like supervision. This places them at further risk of harm.

Young people who flee or are excluded from the family home typically become homeless because of violence, abuse, or neglect in the home, or an unresolved support issue for the child. The AIHW Specialist Homelessness Services data shows that 16 per cent of children and young people presenting alone to SHS services cited family and domestic violence (FDV) as their main reason for seeking assistance with 35 per cent having experienced FDV.² The National Plan to End Violence Against Women and Children 2022-2032 outlines a strategy to end gender-based violence and makes important commitments to prevention, early intervention, response, and recovery. However, the plan tends to see children as extensions of their mothers or female carers. It does not adequately address the needs of unaccompanied children and young people who are experiencing or are at risk of homelessness due to domestic and family violence. Consequently, unaccompanied children and young people experiencing DFV cannot access the same response and

¹ AIHW, Specialist homelessness services annual report 2021-22, Table UNASSISTED.2,

<https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/data>

² AIHW, 'Young people presenting alone', *Specialist Homelessness Services Annual Report 2021-22*, 8 December 2022, <

<https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/young-people-presenting-alone>>

opportunities that adult women and their accompanying children receive. We need to address and adequately fund both cohorts, with funding for services and capital funding for infrastructure.

It is important to note Child and youth homelessness requires a different response from adult homelessness because children and young people have different developmental needs that may not always be recognised in understandings of homelessness based on adult experiences.

The proposed new subsections defining crisis and transitional housing do not consider the specific needs of young people. Subsection 21A(4) defines crisis and transitional housing as “short-term” housing but the transitional housing needs of young people require medium to long-term supports and accommodation periods. Unaccompanied young people who are homeless or at risk have specific needs that are frequently neglected within existing housing and homelessness systems. If not recognised, they will continue to fall through the gaps. Young people’s development needs must be addressed alongside their lack of accommodation. Specialist services such as SYFS provide much more than a roof for these children and young people. Skilled youth workers provide persistent support for the young person’s development. This includes, for example, support to reconnect with or stay engaged in schooling or to find alternative education and training options when the young person is unable to attend school or has finished school.

Transitional housing for young people will also need to consider access to support services to sustain tenancies, assist them to gain living skills and successfully transition to other accommodation options, including social housing. At the very least capital funding for youth transitional housing should be able to include office and other space for support service operations. This is not how current funding operates under the Housing Australia Future Fund Facility, the National Housing Accord Facility or the new Youth Transitional Housing Fund where funding is only allocated on the basis of the proportion of new housing (in this case crisis and transitional) within a broader project.

Is the existing list of eligible project proponents for NHIF (Critical Infrastructure) and NHIF (Social and Affordable Housing) appropriate for the expansion of the NHIF for crisis and transitional accommodation? Are there any other proponents that should be considered?

The existing project components for NHIF are not appropriate for the expansion for crisis and transitional housing as these sub-sets of social/affordable housing require specialist experience and expertise as well as accreditation. The NHIF youth crisis and transitional grants should only be open to applicants from the following:

- Registered Community Housing Providers (CHPs) and Aboriginal Community Housing Providers (ACHPs) that can demonstrate experience in delivering youth housing; and in partnership with a Specialist Homelessness Service (SHS) with experience in working with youth;
- SHS which are a registered CHP/ACHP and able to demonstrate experience in delivering youth housing and working with young people; or
- SHS in partnership with a registered CHP/ACHP and able to demonstrate experience in delivering youth housing and working with young people.

Youth Housing providers which are both SHS and registered CHP/ACHP should be prioritised in this round as they are already experienced. Then we should prioritise those in regional and country areas which will enhance diversity and build capacity.

How could project components use this funding mix, and how could project finance be structured to draw on both grants and concessional loans? (Mix is 700 million for grants and 300 million for concessional loans)

Need to keep the funding very simple and to grants only – this is the only way to encourage smaller and medium-term providers to submit and to build capacity. If the funding system is complicated, you will prevent many from submitting and we need greater diversity and some smaller and medium term providers to deliver especially in regional and country areas and especially for young people.

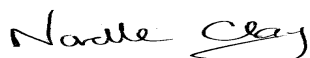
In addition, the preliminary costs of Development applications, construction certificates, reports and design should be funded. These are now very high costs and can prevent some agencies from participating.

What impacts would a time limit for state and territory funding allocations have on project proponents or projects that would come forth for the funding. What are the benefits and unintended adverse consequences?

A time limit of 12 months for allocating funding between states could mean that funding will only be able to be allocated for those project proposals that are 'shovel ready'. If the list of eligible project components remains as is, which we believe that it should not, this will disadvantage SHS and mean projects will go to projects less likely to have experience/accreditation in the provision of crisis and transitional housing and expertise in working with youth. Such a timeframe could also disadvantage rural regions which may need more time to prepare, plan and develop their proposals. As mentioned, funds should not be allocated within state jurisdiction on a per capita basis as rural areas, already in dire need for both crisis and transitional as well as social housing will be left further behind.

We thank you for the opportunity to provide input to the draft amendments to the *Housing Investment Mandate Direction 2018*.and look forward to the positive changes that the increased funding to the NHIF to support crisis and transitional accommodation for youth will usher in for the housing and homelessness sector and for the community as a whole.

Yours Faithfully,



Narelle Clay, AM
Chief Executive Officer