

Submission No. 5 - ACTCOSS



received 8 September 2014

**Submission on**

**Review of ACT Auditor General's  
Report No. 4 of 2013:  
National Partnership Agreement on  
Homelessness**

**August 2014**

## About ACTCOSS

ACTCOSS acknowledges Canberra has been built on the land of the Ngunnawal people. We pay respects to their Elders and recognise the strength and resilience of Aboriginal and Torres Strait Islander peoples. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) is the peak representative body for not-for-profit community organisations, people living with disadvantage and low-income citizens of the Territory.

ACTCOSS is a member of the nationwide COSS network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS' vision is to live in a fair and equitable community that respects and values diversity and actively encourages collaborations that promote justice, equity and social inclusion.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS receives funding from the ACT Government - Community Services Directorate.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

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## Overview

The cost of housing in Australia has risen rapidly over the past decade, particularly in the ACT, where housing costs have increased 63 per cent over the six years to 2012, making Canberra's housing market one of the country's least affordable for low and moderate income earners.

The ACT Council of Social Service (ACTCOSS) advocates for a comprehensive affordable housing strategy which includes reform of housing taxation; direct investment in the growth of affordable housing stock and incentives for private sector and institutional investment in affordable housing; an increase in financial support to low income renters; and sustained support for homelessness services. In particular, ACTCOSS recognises the link between the need for adequate investment in low-income and affordable housing and supported accommodation and reducing unnecessary demand for other services such as crisis accommodation, mental health crisis services and domestic violence crisis services.

In 2011, there were 21,528 people living in poverty; 9,910 households experiencing housing stress; 14,148 people experiencing financial stress; 1,785 experiencing homelessness; and 28,639 disadvantaged people according to the ABS SEIFI Index in the ACT. In terms of suburb level data, there were suburbs that experienced worse poverty, housing stress and financial stress than the Australian average<sup>1</sup>.

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<sup>1</sup> ACT Government, *Detecting Disadvantage in the ACT: Report on the comparative analysis of the SEIFI and SEIFA indexes of relative socio-economic disadvantage in the Australian Capital Territory, ACT, 2012.*

## Introduction

The ACT Council of Social Service (ACTCOSS) welcomes the opportunity to provide input to the Standing Committee on Public Accounts Inquiry into Auditor-General's Report No. 4 of 2013: National Partnership on Homelessness

Other organisations are making submissions to the Inquiry and we recognise their expertise in the detail of particular areas. As the peak body for the community sector and people living with disadvantage in the ACT, ACTCOSS aims to make more visible the challenges faced by low income and vulnerable people in the ACT who are trying to secure affordable, appropriate, stable accommodation.

Our submission will focus briefly on the following matters in the Terms of Reference:

- a. measuring the success/effectiveness of policies and programs targeting homelessness;
- b. progress on implementation of Audit report recommendations as agreed by the Government; and
- c. any other relevant matter.

The Audit report and subsequent review have been undertaken in a context of uncertainty, particularly in terms of ongoing funding for initiatives and programs receiving funding under the NPAH. In this uncertain environment organisations are faced with significant challenges in planning, delivering and sustaining services to those at risk of becoming homeless.

The ACT Housing Policy Consortium that has been funded from 2013-2015, of which ACTCOSS is a member, has identified that there is significant scope for closer collaboration of mainstream services in the ACT that would facilitate flexible and responsive approaches to housing and homelessness support. ACTCOSS advocates for a suitable, effective framework for collaboration with mainstream services that would facilitate flexible and responsive approaches to addressing the housing and support needs of people and people experiencing or at risk of homelessness. This will go some way to identifying housing stress and the risk of homelessness earlier, better supporting people to maintain their housing and preventing recurrence of homelessness.

## Background

The National Partnership Agreement on Homelessness is a Council of Australian Governments initiative that was agreed in 2009 by the Commonwealth Government and all states and territories. It seeks to provide a means whereby people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion.

Under the National Partnership Agreement on Homelessness, each State and Territory is responsible for delivering agreed programs and initiatives that contribute to the overall outcome. The ACT Government has received \$10.06 million in funding from the Commonwealth Government and has contributed \$10.74 million of its own funding to a suite of programs and initiatives under the National Partnership Agreement on Homelessness<sup>2</sup>.

In February 2012 each State and Territory agreed to undertake a concurrent audit of the National Partnership on Homelessness. The audits were to focus on each specific jurisdiction and be flexible to the specific needs and priorities of each jurisdiction.

The ACT Audit followed three lines of inquiry;

**1. Are programs and initiatives delivered under the NPAH well planned, and supported by sound administrative process and systems?**

ACTCOSS acknowledges that the Audit report's focused on the ACT Government meeting its obligations under the NPAH. In terms of programs and initiatives delivered under the NPAH being well-planned the audit found there are clear objectives for current funding agreements which are due to expire in 2015, however. ACTCOSS acknowledges work by the ACT Government to advocate for continuation of the NPAH beyond June 2015 to improve certainty of funding for essential services to Canberrans. ACTCOSS is concerned that there is no ACT Government plan for continuation of services or funding in the event of loss of Commonwealth funding.

Despite this uncertainty, there has been a dedicated effort by the ACT Government to work with the sector on establishing an outcomes framework for contract reporting as well as working towards measures to reduce red tape and administrative burden on community organisation delivering services under NPAH funding. ACTCOSS supports continued collaboration by the ACT Government with people who access services and organisations that provide services in improving the quality of reporting. We are particularly keen to continue joint commitment to ensuring the capture of high quality data through the reporting process to ensure effective evaluation of the impact of programs.

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<sup>2</sup> National Partnership Agreement on Homelessness

### **Recommendation:**

ACTCOSS recommends the ACT Government works with people who access services and organisations that provide services to develop an agreed strategy, and core priorities, to meet continuing need for housing and homelessness support services if the ACT loses Commonwealth NPAH funding in June 2015.

## **2. Is the implementation of the ACT's 'Our Place', 'A Place to Call Home' and 'Housing and Accommodation Support Initiative' or HASI, making a difference for homeless people or those at risk of becoming homeless?**

Of the nine programs funded under the NPAH the Audit looked at three specific programs; *A Place to Call Home*, *Our Place*, and the *Mental Health Housing and Support Initiative (HASI)*. While these programs represent a significant proportion of NPAH funding, other programs such as *First Point*, *Sustaining Tenancies* and *Street to Home*, had a much larger reach in numbers of people supported. Any future decisions about priorities for funding services needs to be built on a more a comprehensive examination of the effectiveness of NPAH and other funded services in the housing and homelessness service systems.

ACTCOSS is aware that a forthcoming evaluation of the ACT Homelessness Sector Reforms will provide a good opportunity to look at broader system issues, effectiveness and impact on making a difference for homeless people or those at risk of becoming homeless.

## **3. Are ACT Government agencies and non-government organisations collaborating effectively to deliver the NPAH?**

ACTCOSS commends the ACT Government in carrying some of the Commonwealth funding cuts of \$5.9 million, only passing on \$3.6 million in funding cuts.

The service providers involved in providing housing support and homelessness services were invited to comment on the priorities for the evaluation noted above.

Whilst these are welcome steps there is still room for improvement in how the ACT Government communicates and collaborates with the sector. In particular, ACTCOSS has recently been involved in advocacy work regarding the funding contracts for ACT homelessness service providers, and the lack of cumulative indexation attached to these contracts for 2014-15.

ACTCOSS is concerned at the lack of transparency and warning given to service providers about the changes to funding, particularly since these changes only came to light after service providers had developed their internal budgets, and had them approved by their governing bodies, prior to the start of the financial year.

We are also concerned that this whole process has been only one example of a larger problem - that of a lack of practical understanding, by people in funding agreement areas and government managers, of the impact on service provider organisations of their decisions and the timing of advice provided by the ACT Government.

### **Recommendation:**

To rectify this situation, ACTCOSS recommended:

1. ACT Housing provides Joint Pathways members, individually, a table with actuals for 2014-15 and out years, showing impact of indexation decisions on each year.

*This has been agreed*

2. ACT Housing offer to all service providers to renegotiate outputs/outcomes, and providers have the opportunity to report on the impact of reduced outputs on responding to needs of service users.

*This has been agreed*

3. If one does not already exist, then a standard process/procedure is developed and published around the timelines for
  - a. developing changes to funding, indexation, regulation and other relevant processes in government and not-for-profit relationships
  - b. the sharing of information around funding changes for service providers
  - c. timelines for releasing contracts/variations

*Awaiting decision*

4. Community Services Directorate agrees to fund the development and delivery of training for all relevant CSD staff on governance and operational imperatives that need to be taken into account when changing policy, regulations, and funding for service provider organisations.

*Awaiting decision*



## Measuring the success/effectiveness of policies and programs targeting homelessness

The stated aim of the Audit Report 4/2013 was to review the performance of selected initiatives under the National Partnership agreement on Homelessness (NPAH). The review had two clear objectives; to identify that the ACT government is meeting its obligations, and that the NPAH is making a difference for homeless persons.

The report provides considerable detail on the first objective of ACT government obligations, providing a comprehensive snapshot of the current homelessness service operating environment in the ACT, and provides reasonable recommendations to the Community Services Directorate regarding financial management and contract management.

However, ACTCOSS agrees with the submissions to this inquiry of other organisations such as St Vincent de Paul Canberra/Goulburn and the Youth Coalition of the ACT that the audit report does not adequately consider whether NPAH is making a difference for people who are homeless in the ACT. It is important to develop a more comprehensive evaluation that can gauge the value and effectiveness of this funding, and investment overall, in addressing housing and social inclusion needs.

There is concern among the sector about the selection of programs funded under the NPAH to be reviewed, as well as a perception that the focus of the report was heavily weighted on ensuring the ACT government has met its requirements to the Federal Government. By focusing on only three of the nine programs funded under the NPAH; *A Place to Call Home*, *Our Place*, and the *Mental Health Housing and Support Initiative (HASI)*, that account for 60% of allocated funding, it does not provide a sufficient evidence base regarding the impact of the services provided to people experiencing homelessness in the ACT.

ACTCOSS has also received feedback about concerns relating to the consultation process undertaken as part of the report, particularly in terms of feedback from Community Organisations. This reflects wider concerns about the quality of communication and engagement with the sector around reporting processes. The report did not adequately consider the perspectives of service providers or service users, particularly in terms of identifying feedback and reporting from community organisations operating programs and initiatives within the detail of the report. It is difficult to establish the level of involvement that these organisations and providers had into the audit report.

As noted by other submissions, the four recommendations made by the audit report focus primarily on financial and contract management. The recommendations contained in the report do not reflect measures to improve the quality or impact of services funded under NPAH but rather centre on aspects such as financial acquittals, late reporting for a service and the finalising of the HASI review. While these are important aspects to examining reporting obligations they do not provide insight on the effectiveness or impact of the NPAH in making a difference to people experiencing homelessness in the ACT.

As noted above ACTCOSS recommends the ACT Government works with people who access services and organisations that provide services to develop an agreed strategy, and core priorities, to meet continuing need for housing and homelessness support services if the ACT loses Commonwealth NPAH funding in June 2015.

## Progress in implementation of Audit report recommendations as agreed by the Government

The Audit report delivered four key recommendations focusing around financial and contract management.

### **Recommendation 1 (Chapter 3) – Financial Management**

The Community Services Directorate should improve its processes for coordinating the expenditure of *National Partnership Agreement on Homelessness* funds to enable accurate recording and reporting of program resources and expenditure. Program resources and expenditure should be periodically reconciled.

*Internal to Government, no comment*

### **Recommendation 2 (Chapter 4) – Contract Management**

The Community Services Directorate should improve its contract management of service providers by:

- a. requiring that a financial acquittal is undertaken for all funds provided to the service provider under the service funding agreement; and
- b. obtaining and approving documentation associated with any subcontracting arrangements.

*Internal to Government*

*The community sector are working with the ACT Government through the “Red Tape” reform process to ensure the compliance expectations of government are clearly outlined, and the process of reporting is simplified.*

### **Recommendation 3 (Chapter 3 and Chapter 5) – Financial Management**

The Community Services Directorate should review the key performance indicators associated with the A Place to Call Home Program and Housing and Support Initiative, to inform performance indicators for any future or similar programs it manages.

*ACTCOSS would add to this recommendation that any changes to performance indicators needs to be informed by the priorities of people who access services, evidence from research and advice from organisations that provide services.*

*Performance indicators rely on quality data capture, data consistency, analysis and literacy, all of which need support and resources to build capacity across the ACT Housing and Homelessness sector. ACTCOSS would like to see more support and resourcing to ensure people who access services and service providers can engage fully in the development of performance indicators that reflect measures of meaningful change in the circumstances and trajectories of people accessing services and reducing long term demand for housing support and homelessness services.*

#### **Recommendation 4 (Chapter 5) – Review**

The Community Services Directorate, in consultation with the Health Directorate, should finalise the review of the Housing and Support Initiative.

*It is now urgent to get this evaluation completed as it needs to be determined by March 2015 what will continue and what will face cessation if Commonwealth funding is cut.*

*A Place to Call Home, Street to Home, Transitional Support and Head Tenancies, Supportive Tenancy Services, Helping Our Senior Tenants, Managed Accommodation Program, First Point, Our Place and HASI all receive funding under the NPAH which is due to expire at the end of 2014-15, placing these programs at risk.*

*ACTCOSS would like to see a collaborative decision making process involving Government, people accessing services and support, specialist housing and homelessness service providers, other specialist services and mainstream services to determine the strategy and priorities for ongoing provision of housing support and homelessness services after June 2015.*

*Please see attached below a Services Map of the essential components of the service system to reduce homelessness and respond to housing and support needs in the ACT. This map was developed through the Joint Pathways group in 2012 and should guide development of the strategies and priorities for ongoing provision of housing support and homelessness services after June 2015.*

## Other relevant matters

The Auditors report assessed some components of administration of the NPAH program. It did not assess the administration role related to future planning of services. These issues were considered as part of an ACTCOSS submission to the ACT Government regarding funding cuts in 2013. This submission called on the ACT Government to act on four recommendations to improve prevention of and responses to homelessness, and to reduce the risk of recurrence of homelessness. These recommendations and the actions taken are outlined below:

1. That the ACT Government work through the Joint Pathways Network to map the impact of \$3.6m in funding cuts, using the Services Map developed prior to announcement of the funding changes, on service options available in the community. This work should be completed by August 2013.

*Completed*

2. That the ACT Government establish a cross portfolio committee comprised of senior ACT Government and ACT Community Sector leaders that will conduct a whole of government assessment of the expected impact of funding cuts in the housing and homelessness support system on demand and costs in universal, secondary and tertiary services in the ACT. This committee should identify the quantum and source of funds needed to maintain prevention, early intervention, crisis and recovery support partnerships with services funded via the National Affordable Housing Agreement. This committee should report to Cabinet by September 2013.

*No action*

3. That by March 2014 the ACT Government completes a comprehensive assessment of the:
  - a. Cost-effectiveness and outcomes of current service models and forms of intervention offered in Canberra on prevention, early intervention or crisis responses to homelessness
  - b. Critical factors in Canberra for stabilisation of housing and maintenance of good housing outcomes for people who have been homeless
  - c. Any changes needed in the service system as a whole in Canberra to more effectively respond to people who are homeless and reduce homelessness.

*The ACT Government funded a Housing Policy Consortium from June 2013-June 2015. The Consortium has undertaken research that includes assessment of b) and c), but further work is needed to complete a comprehensive assessment and reach agreement on changes that need to be made in service models and funding.*

4. That by June 2014, the ACT Government has developed a long term cross portfolio investment and long term procurement strategy that will:

- a. Meet demand for affordable housing in the bottom two income quintiles
- b. Reduce the number of people in Canberra who do not have a home to call their own
- c. Pool funds from across portfolios to maximise prevention of and early intervention in homelessness, reduce demand for crisis services, facilitate prompt access to and maintenance of stable, affordable, appropriate housing for people who have been homeless
- d. Ensure housing and homelessness support services can respond effectively to meet current and emerging needs

*Some action on this recommendation has been taken via the Affordable Housing Strategy, the 2014 announcements regarding renewal and development of ACT Public Housing properties, the Human Services Blueprint and Better Services program. Substantially more work is needed, and to be done urgently, given the potential funding cut from the Commonwealth in June 2015.*

## ACT Housing Support Services Map

Prevention (Tier 3)	Early Intervention (Tier 2)	Crisis (Tier 1)	Stabilisation (Tier 2)	Maintenance (Tier 3)
<b>Central Intake Service</b>				
<b>Drop in Centres</b>				<b>Drop in Centres</b>
<b>Network and Coordination</b>				<b>Network and Liaison</b>
<b>Affordable Housing</b>				<b>Affordable Housing</b>
<b>Domestic Violence/Sexual Assault Support</b>				
<b>Conflict Resolution/Mediation</b>		<b>Conflict Resolution/Mediation</b>		
<b>Tenancy Support</b>		<b>Tenancy Support</b>		
<b>Relationship Support</b>		<b>Relationship Support</b>		
<b>Case/Life Management</b>		<b>Case/Life Management</b>		
<b>Training and Education Services</b>		<b>Training and Education Services</b>		
<b>Financial Counselling</b>		<b>Financial Counselling</b>		
<b>Legal Support</b>		<b>Legal Support</b>		
		<b>Crisis Network</b>		
<b>Accommodation Options (crisis, transitional and long term)</b>				
<b>Mainstream Services</b> <ul style="list-style-type: none"> <li>- Education</li> <li>- Family Support Programs</li> <li>- Refugee/migration services</li> <li>- Mental Health services</li> <li>- Centrelink</li> <li>- Child and Family Centres</li> <li>- Aboriginal &amp; Torres Strait Islander Services</li> <li>- Drug and Alcohol services</li> <li>- Housing Providers</li> <li>- CALD services</li> <li>- Hospitals</li> <li>- Disability Services</li> <li>- Emergency Relief Providers</li> <li>- Counselling services</li> <li>- Job Service Providers</li> <li>- Religious services</li> <li>- Police/Justice</li> </ul>				<b>Mainstream Services</b> <ul style="list-style-type: none"> <li>- Education</li> <li>- Family Support Programs</li> <li>- Refugee/migration services</li> <li>- Mental Health services</li> <li>- Centrelink</li> <li>- Child and Family Centres</li> <li>- Aboriginal &amp; Torres Strait Islander Services</li> <li>- Drug and Alcohol services</li> <li>- Housing Providers</li> <li>- CALD services</li> <li>- Hospitals</li> <li>- Disability Services</li> <li>- Emergency Relief Providers</li> <li>- Counselling services</li> <li>- Job Service Providers</li> <li>- Religious services</li> <li>- Police/Justice</li> </ul>
<b>Sector Support</b>				