



Commissioner for Children and Young People
Western Australia

All enquiries

Telephone: (08) 6213 2224
Email: Katherine.browne@ccyp.wa.gov.au
Our reference: 18/9397

Homelessness Strategy Team
Department of Communities
PO Box 6334
East Perth WA 6892

cc: homelessness.strategy@communities.wa.gov.au

Dear Homelessness Strategy Team,

I am providing this submission to contribute to the development of the Department for Communities' 10 Year Strategy on Homelessness ("the Strategy"). As Commissioner for Children and Young People in Western Australia, my role is to advocate for the best interests of all children and young people under the age of 18 in Western Australia, and to promote and monitor their wellbeing. In doing so, I must have regard for the United Nations Convention on the Rights of the Child, and give priority to Aboriginal children and young people, and children and young people who are vulnerable or disadvantaged for any reason.

Since its inception 10 years ago, the Commissioner for Children and Young People's office has consulted Western Australian children and young people on a range of important issues that affect their lives and wellbeing. While many of the children and young people who participated in these consultations were faring well and living in nurturing households and communities, a significant proportion had experienced adversity in their lives. Recent projects of my office have included looking at the experiences of homelessness for young people under the age of 16, in response to a gap in services for this cohort of children and young people, as well as our work on building a better understanding about the vulnerability of children and young people, and the best avenues to address and reduce the impact of adversity on a child or young person's long term outcomes.

In this submission, I would like to provide feedback on the consultation questions posed in the online survey for the Strategy, including areas that the Strategy should focus on, barriers for children and young people accessing services, ideas for addressing homelessness and service provision and other strategic considerations in the development of the Strategy outlining some of the specific considerations regarding children and young people and their experiences of homelessness. Throughout the document, I will be using quotes from children and young people and stakeholders that have been involved in consultations with our office, to outline their relevant lived experiences of homelessness and housing instability.

Areas that the Strategy should focus on

Children and young people experiencing homelessness

"Not having a family all of a sudden.....it's really difficult for me just to move on and accept the fact that I'm by myself, I have to take care of myself and learn all of these living skills and do all the things that I need to get involved with myself within the society where you're supposed to be at least an adult to get into, like 18 years old." 15 year-old (Vulnerability consultation)

I was pleased to see that the Department of Communities background report, *Homelessness in Western Australia: A review of the research and statistical evidence*,¹ ("Strategy Report") had a specific section focusing on the needs and experiences of children and young people, which is vital given the numbers of children and young people in Western Australia experiencing homelessness and unsuitable living conditions and the outcomes for these children and young people. During the Census collection period in 2016, 1,949 children and young people in Western Australia were counted as homeless (including those living in severely crowded dwellings), with 1,208 of these under the age of 12.² Additionally, around 9,000 children and young people were on the public housing waiting list as of 30 June 2017³.

"For young people...the situations that drive them on to the streets and into homelessness are often long-term and entrenched. There may be a lifetime of neglect, family violence or substance abuse and departmental intervention."
Service provider (Homelessness consultation)

The factors that influence or precede issues relating to youth homelessness typically occur prior to a young person turning 16,⁴ with mental health, substance use, poverty and housing issues all contributing as key drivers for child protection intervention, children and young people coming into care, and child and youth homelessness. Children and young people who first experience homelessness at a young age are more likely to experience persistent homelessness in adulthood, resulting in significant costs to the Australian community in terms of health, justice and community services, not to mention the impact on the individual's wellbeing, livelihood, and life opportunities. Children and young people are generally less equipped than adults to be able to overcome the adversity of housing instability and homelessness, having had less opportunities for education and work experience, making it more difficult for them to gain employment and get access to rental housing and mortgage options, less demonstrated rental history or references, and less financial options or savings that they can draw on in case of an emergency. It is vital that we can find ways to intervene early and break the intergenerational cycle of poverty, unemployment and homelessness, with a focus on the needs of vulnerable children and young people.

¹ Kaleveld L et al 2018, *Homelessness in Western Australia: A review of the research and statistical evidence*, Government of Western Australia, Department of Communities.

² Australian Bureau of Statistics 2018, *Census of Population and Housing: Estimating Homelessness, 2016*. Cat no. 2049.0

³ Commissioner for Children and Young People 2017, *Profile of Children and Young People in WA*, Commissioner for Children and Young People WA, Perth.

⁴ Mallett S et al 2005, 'Young people, drug use and family conflict: Pathways into homelessness', *Journal of Adolescence*, 28(2), pp. 185-199.

As mentioned in the Strategy Background Report, homelessness can be experienced by a child or young person as part of their whole family unit (i.e. where the whole family is experiencing homeless), with an individual parent or family member, or where a child or young person experiences homelessness as an individual and independent of their family, for example, in situations where they leave or are forced to leave the home.

Where children and young people experience homelessness independently, there is a gap in terms of understanding and addressing the needs of those who are under the age of 16. The service systems tends to focus on the provision of services to meet the needs of young people who are aged 16 and over, meaning there are service gaps for children and young people who are experiencing homelessness at a younger age. This year, my office conducted a research project, in collaboration with Edith Cowan University, to hear from young people who had experienced homelessness between the ages of 12 to 15.^{5 6} These young people discussed the different pathways and context that led to their experiences of homelessness, the family difficulties that many experienced prior to becoming homeless, a lack of stability and supports, and difficulties accessing services and supports due to their age and lack of a guardian.

Priority populations

As well as children and young people being identified as a priority group for support through the strategy, it is important that the Strategy further addresses the needs of other populations or cohorts who are either more likely to experience homelessness, or who have specific needs and experiences which need to be considered in service delivery. The strategy should give specific considerations to the needs of Aboriginal people, people with a disability, people from Culturally and Linguistically Diverse backgrounds, families with children, young parents, children and young people involved in, or leaving, the child protection and youth justice systems, people with mental health, alcohol and other drug issues, and people who identify as lesbian, gay, bisexual, trans or intersex (LGBTI).

This may include having dedicated specialist services for particular population groups, ensuring that existing services are supported to build capacity in their work with priority population groups, or having specific allocations for priority populations as part of a broader service model. Successful examples of these kind of dedicated specialist services include the Living Independently for the First Time (LIFT) program for young people exiting the out-of-home care system, the Nest program and Foyer Oxford for young parents, and Perth Inner City Youth Service for its specialised support of trans and gender diverse young people and young people with complex mental health needs.

Cross-sector strategies to address disadvantage and complex needs

"People don't help them to get their basic needs and wants so they go out and do it themselves. But otherwise, they just be sleeping on the streets, with nothing, only their clothes." That's why they just do crime in general, for

⁵ Cooper T 2018, *Policy and Support Needs of Independent Homeless Young People 12-15 years: Young People's Voices*, Perth : Commissioner for Children and Young People and Edith Cowan University

⁶ Cooper T et al 2018, *Policy and Support Needs of Independent Homeless Young People 12-15 years: Service Providers' Perspectives*, Perth: Commissioner for Children and Young People and Edith Cowan University

survival, or the result of people, you know of racism, or family issues, family problems, you know, relationship problems between friends.” 18 year-old (Youth Justice Consultation)

Access to stable and safe housing and accommodation is critical to addressing long-term disadvantage facing many Western Australians, and this Strategy will play an important role in articulating what is required to achieve better outcomes across the State. However, a broader strategic approach also needs to be taken to ensure that the Strategy is aligned to, and works in conjunction with, other pivotal State strategies and reforms which address the complex social, physical and economic contexts which impact on people who are experiencing, or are at risk of experiencing homelessness. This requires clear collaboration and agreement between government agencies and sectors to address some of the complex needs and experiences of the Western Australian population, including alignment with other strategies such as the Youth At Risk Strategy, Earlier Intervention and Family Support Strategy, Mental Health, Alcohol and Other Drug Accommodation Strategy and Youth Strategy, and Family and Domestic Violence Prevention Strategy. This would also require alignment with the services and roles of other government departments, including youth justice, education, health and other systems which interact with children and young people.

Consultation with children and young people

It is important to provide children and young people with an opportunity to contribute their opinions, ideas and experiences to inform the development of the Strategy. We would encourage the Department of Communities and the sector to identify opportunities to seek direct feedback from children and young people, as well as use information that is being or has been gathered through other consultations with Western Australian young people, for example consultations through At Risk Youth Strategy, Youth Strategy consultations, and co-design mechanisms being led by Anglicare WA identifying models of support for young people leaving out-of-home care. This will ensure that the experiences of children and young people are able to inform and guide the development of the Strategy, and that services are being developed in response to their needs and experiences.

Barriers for children and young people accessing services

In our research project on homelessness, young people and stakeholders identified a range of issues for young people under 15 who were independently seeking assistance with housing and homelessness, including:

- An overall lack of accommodation and housing services in Western Australia for young people aged under 16, and demand for these services not being met.

"The biggest barrier for me getting something is my age... I'm just 15 and I'm almost a month away from being 16, you still have boundaries until the first second you turn 16 and you can do all these things and like it's just ridiculous, you should be able to do something a couple of weeks before you turn 16." 17 year-old (Homelessness consultation)

- The strict eligibility requirements for services may result in young people being ineligible to access the service and supports (e.g. age of the young person, need for a young person to be enrolled in a day program).

"I've been in and out of hospital... Wasn't allowed to stay in [youth accommodation hostel] during the day, when came out of hospital had to crash at mate's place, just wanted to sleep." 15 year-old (Homelessness consultation)

- Guardianship challenges for young people under 16, and their eligibility for supports and services, including Centrelink and financial supports, without parental consent.

"I'm 15 years oldwhen I've been homeless, it's been really hard for me to get real support from the government, the Centrelink and it's mainly because of age like, even though I'm 15 years old there still so many restrictions I have." 15 year-old (Vulnerability consultation)

"Homelessness for 15-year-olds can be challenging due to our responsibility to them...Often, we might need authorisation from family or the department [CPFS] to house a 15-year-old with the understanding they would take them back if their accommodation broke down. This is not always possible when a 15 year old is fleeing an abusive family." Service provider (Homelessness consultation)

- Limited specialist support offered for young people in accommodation services, for example, mental health, support for young parents, education support.
- Services feel that they are not able to adequately meet the needs and intensive support requirements of young people under 15 within their existing service models.
- Issues in transition between different services and systems, for example, requiring hospital discharge and not having appropriate accommodation, bail options for young people exiting the justice system.
- Lack of options for young people to access long-term and more permanent accommodation options after a period of time in crisis accommodation or short-term housing.

"There are almost no medium/long term options for 15-year-olds and we would have to exit them after 3 months. This is babysitting at best, this does not help to fix the issues of homelessness." Service provider (Homelessness consultation)

- Challenges in clarifying the role of child protection authorities where a young person under 16 is homeless, and ensuring safety for those children and young people where family reunification is not safe or possible.

Ideas for addressing homelessness and service provision

Young people and stakeholders in our research project identified a range of opportunities to improve service provision for young people accessing homelessness services independently, including:

- Early intervention strategies, and opportunities to work with children, young people and families to prevent crisis.
- A clearer role for child protection authorities in providing early intervention and support, particularly where young people under 16 are not safe to remain in the family home.

- Establish and reinstate protocols between child protection and youth accommodation services, in order to provide support for young people under 16 in emergency accommodation services.
- Increased accommodation and supported accommodation options for young people under 16.
- More tailored and intensive support for young people (e.g. one-on-one support worker).

"They [Department of Communities – Child Protection and Family Support] tried to find me but not exactly helping in a lot of ways. The help I was receiving wasn't the right form of help, I wasn't receiving assistance with counselling, really stuff I needed like counselling was the main thing I needed living on the streets for so long." 18 year-old (Homelessness consultation)

- Services which are co-designed with young people to ensure they are meeting their needs.
- Ensure there are sufficient specialist services available for young people with specific support needs, with a focus on programs that have a demonstrated outcome for young people (including services such as the LIFT program, Nest, PICYS, Foyer Oxford).
- More options and appropriate exit pathways into permanent and long-term accommodation options.
- Flexibility in service system to provide supports for children and young people with complex, challenging or other diversity needs (e.g. mental health, AOD use).
- Holistic and wraparound services to support young people who require multiple services.

Child-centred approach

It is vital that housing and homelessness services, policies, and legislation are designed in a child-centred way, placing the needs of children and young people at the centre of service planning. This might include:

- Prioritising how to maintain and support families with children in their own home, where safe to do so and in the best interests of the child or young person.
- Ensuring accommodation and housing services are provided in a way which supports children and young people and their families to have personal and family space, and which provide a sense of security, control and normalcy for children and families.
- Seeking to find long-term accommodation and housing options immediately and establish wrap-around support for families, rather than having families entering into crisis services.
- Supporting and prioritising a child's ongoing connection to community and place, for example, their schooling, friends, networks, hobbies and family.

- Establishing “key workers” to minimise the number of people the individual is having to engage with over time, and which promotes stability, relationship building and rapport.

“I needed someone to talk to, because I never had someone who was there 24/7 for me. I always had a different person I seen when I came to DCP, it became frustrating and scary for me. So I never had no one to trust.” 18 year-old (Homelessness consultation)

“You know how [my son] is involved with justice system, so you have Corrective Services or whatever generally for education, housing and DCP, that’s a bit confusing but there’s like 20 different people every day. Well maybe there could be a service that’s involved in that area, where they can get one person to deal with that family and their issues, and have one person allocated to that family... and communication can be done by that one person because it does get overwhelming.” Mother (Youth Justice Consultation)

- Supporting children and young people’s participation in the decision making about supports and options available to them.
- Ensuring that staff working alongside children and young people and families have the skills and knowledge to support them adequately.
- Identifying the after-care supports that are required after a child, young person or family has exited the service.⁷

In addition to this, child and youth centred organisations should prioritise cultural safety, and be therapeutic and trauma competent in their approach. Policy and legislation also need to be strengthened to support stable tenancies for families with children, for example, ensuring a child-centred approach within public housing policies (e.g. mitigating the implications of the Disruptive Behaviour Management Strategy on families with children), and enhancing the Residential Tenancies Legislation to empower victims of family violence to maintain safe and stable housing.

Other strategic considerations for the development of the Strategy

Child Safe Organisations

As a result of the Royal Commission into Institutional Responses to Child Sexual Abuse, it will be a requirement for organisations to take responsibility to protect children and young people from harm and abuse, and implement strategies to manage and identify risks that affect their safety and wellbeing. The Royal Commission assessed the varying degrees of risk of child sexual abuse in children and young people’s interaction with organisations, based on characteristics of the child, the nature of engagement with children and young people, and the characteristics of services and organisations.⁸ Whilst the risk was discussed specifically in the context of child sexual abuse, it is applicable to the risk of other types of harm to children and young people. Given the vulnerability for children and young people and/or their families who are experiencing

⁷ Moore T et al 2007, *Finding their way home: Children experiences of homelessness*, Institute of Child Protection Studies, Australian Catholic University.

⁸ Parkinson P., Cashmore J., 2017, *Assessing the different dimensions and degrees of risk of child sexual abuse*, Royal Commission into Institutional Responses to Child Sexual Abuse, Sydney.

housing issues and homelessness, and the increased situational risk for organisations providing accommodation and support services, it is vital that the Strategy outlines the need for services take responsibility to ensure the safety of children and young people across all aspects of service provision, and the strategies required to achieve this.

My office have been committed to promoting and supporting the implementation of principles and practices of child safe organisations in Western Australia. Our Child Safe Guidelines mirror the frameworks established by the Royal Commission into Institutional Responses to Child Sexual Abuse, and other national frameworks, focusing on strategies across the following nine domains:

- Leadership, governance and culture.
- Child safe and friendly policies.
- Child friendly complaint process and reporting.
- Empowering children to participate.
- Managing staff and volunteers.
- Education and development.
- Involving family and community.
- Safe environments – physical and online.
- Continuous improvement.⁹

Our office has a range of resources to support organisations to develop child safe strategies, including the *Child Safe Organisations WA: Guidelines* and *Child Safe Organisations WA: Self-assessment and review tool*, available at www.cyp.wa.gov.au. We would also be happy to discuss further with the Department of Communities and the housing and homelessness sector to support this focus.

I look forward to the opportunity that this Strategy presents in addressing the problems of homelessness for children and young people and their families across the State. Please contact my office if you would like to discuss further, and we look forward to opportunities to provide further input and contribute as the Strategy progresses.

Yours sincerely



COLIN PETTIT

Commissioner for Children and Young People WA

14 December 2018

⁹ Commissioner for Children and Young People WA, 2016, *Child Safe Organisations WA: Guidelines*, Commissioner for Children and Young People WA, Perth.