

NSW Women's Refuge Movement Inc
Response to the "Future Directions of Specialist Homelessness
Services: Consultation Paper"

Contact: Tracy Howe
Chief Executive Officer
NSW WRM
Email: eo@wrrc.org.au
Phone: 9698 9777
PO Box 3311 Redfern, NSW 2016



TABLE OF CONTENTS

Introduction	4
About the NSW Women’s Refuge Movement	5
CASE FOR REFORM.....	5
Repeat Usage of Specialist Homelessness Services –	Commonly referred to as ‘churning’ 5
Reasons for repeat usage of SHS services.....	6
Access to post crisis support	7
Domestic and Family Violence and Homelessness	8
Suggested Broad Principles for Reform	9
Responses to questions in the consultation paper	10
1. What are the opportunities to build on existing approaches to providing support to stop people becoming homeless?.....	10
2. What are the opportunities to build on existing effective approaches that give homeless people the best possible chance of finding and staying in safe and affordable housing?	16
3. What are the opportunities to build on existing effective approaches to building and sustaining partnerships with NGOs? And.....	18
4. What are the opportunities to improve coordination and integration of the homelessness services system across SHS, mainstream and specialist services?	18
BUILDING BLOCKS	19
Individualised Approaches	19
5. What are the opportunities to build on existing good practice in the SHS to implement individualised approaches.....	19
6. What are the main design principles that need to be embedded in these individualized approaches?	20
7. What are the main implementation issues and risks that will need to be considered in developing individualised approaches?.....	21

8. What are the possible funding and delivery arrangements that would support implementation of individualised approaches?.....	23
STREAMLINED ACCESS	24
9. What are the opportunities to build on existing good practice in the SHS sector to build a streamlined access system?	25
10. What are the main design principles that need to be embedded in the SHS access system?	26
11. What are the main implementation issues and risks that will need to be considered in developing improved access arrangements?	26
BETTER PLANNING AND RESOURCE ALLOCATION	27
12. What are the opportunities to build on existing regional planning and resource allocation processes? &	28
14. How can services and consumers be better engaged in regional planning processes? &	28
16. What are the possible planning and procurement arrangements that would support better resource allocation decisions?	28
13. What are the main design principles that need to be embedded in future planning and resource allocation arrangements?	29
14. What are the main implementation issues and risks that will need to be considered in future planning and resource allocation arrangement?	29
15. What are the possible planning and procurement arrangements that would support better resource allocation decisions?	30
Promote and Support Quality Improvement	30
17. What are the opportunities to build on existing quality improvement initiatives? &.....	30
18. What are the priorities and actions that should be pursued to promote and support quality improvements?	30
Industry and Workforce Development	33
19. What are the opportunities to build on existing industry and workforce development initiatives?	33
20. What are the priorities and actions that should be funded under the Industry and Workforce Development Strategy?	33
Governance Structure	34

Introduction

The NSW Women's Refuge Movement welcomes the opportunity to provide a response to the consultation paper. The NSW WRM supports the Department of Family and Community Services Strategic Directions of a focus on people not programs; Intervening early to support individuals and families; harnessing community capacity and focusing on results and the alignment of SHS reform to these directions. This consultation process represents an opportunity to build a shared understanding of the existing strengths of specialist homelessness services and how these can be built upon and strengthened. It also provides an opportunity to build shared understanding and responses to the needs of different target groups at both a regional and state wide level. But as with any reform process there are also some inherent risks which may result in poorer outcomes for homeless people and those at risk. This risk can be minimised by extensive sector engagement and utilisation of its existing expertise and knowledge of target groups and understanding of their communities.

As has been stated consistently throughout this initial consultation period reducing homelessness in NSW will not be possible without broader reforms and strategies aimed at:

- Increasing access to safe and affordable housing whether this be through the private rental market, affordable or social housing. The WRM has welcomed the considerable efforts by both the NSW and the Commonwealth Governments in this regard through the Economic Stimulus Funds, the NRAS and the NAHA. The NSW WRM has also welcomed the provision of the Start Safely subsidy and the recent announcement that the subsidy period has been extended to two years. The extended Start Safely subsidy period will assist more women and children achieve long term sustainable housing outcomes. Increased safe and affordable housing options for women and children exiting women's refuges will hopefully over time reduce the number of women and children turned away from refuges for women and children escaping domestic and family violence. However, as Government and NGO sector is very well aware the demand of affordable housing options far exceeds the supply and remains the most significant barrier to improving outcomes for homeless people and those at risk.
- Improving responses to homeless people and those at risk, including women and children experiencing domestic and family violence by a diverse range of mainstream services and other specialist services not funded through SHS.

About the NSW Women's Refuge Movement

The NSW Women's Refuge Movement is the state-wide representative body of women's refuges and associated specialist domestic and family violence services within NSW, with a specific focus on the provision of support and advocacy for women and children who are homeless or at risk of homelessness due to domestic and family violence. The WRM provides a representative and advocacy function for women's refuges and associated specialist domestic violence services and the women and children they support, and remains committed to facilitating and supporting ongoing improvement and good practices within women's refuges

The NSW Women's Refuge Movement:

- Provides a supportive network and forum for members to discuss and promote best practice and exchange skills and knowledge;
- Undertakes projects to facilitate the work and effective operation of member refuges;
- Develops and provides resources and information about women and children's homelessness, domestic violence and related matters for members, the sector and the community;
- Advises and informs Government about issues relating to domestic violence and sexual abuse, women and children's homelessness, and the needs of women and children as clients of Specialist Homelessness Services and other services; and
- Works with government and community groups to improve responses to women and children escaping domestic violence, sexual assault and other forms of abuse.

CASE FOR REFORM

Repeat Usage of Specialist Homelessness Services – Commonly referred to as 'churning'

The Discussion Paper notes that clients accessing accommodation services rather than non-accommodation services provided by SHS are more likely to have multiple periods of support. The NSW Women's Refuge Movement has multiples concerns about the use of this data and the underlying assumptions associated with it. The data presented is based on the analysis of Price Waterhouse Coopers. ***As the Office of the WRM has highlighted in discussions with FACS this analysis is inadequate as the definitions of 'accommodation support' and 'non-accommodation support' used by PWC in our view are not accurate.*** The SAAP Data reports provide a breakdown of accommodation periods and non- accommodation support periods (*Table 1*) demonstrate that the number of early intervention/post crisis supports have been a larger proportion of all support periods

over the 5 year period used in the PWC analysis and further to that the proportion of non-accommodation support periods have increased from 52% in 06/07 to 66% in 09/10. The WRM is of the view that this increase would be for a number of reasons including the increased focus on early intervention and post crisis support in the SAAP V agreement, continuous improvement in data collection practices by services and also, services becoming increasingly responsive to client need and the needs of their community. ***The WRM therefore does not support the paper’s contention that “SHS are predominantly focused on crisis accommodation rather than a balance that includes preventative measures and post crisis supports.”¹***

Table 1

SHS Data	06/07 ²	07/08 ³	08/09 ⁴	09/10 ⁵
SHS Accommodation	48%	41%	42%	34%
Non - Accommodation	52%	59%	58%	66%

The examination of the SAAP data reports from AHW clearly indicate that the PWC definition of Accommodation Support includes some early intervention and post crisis support periods. Given the increased focus on early intervention and prevention and the provision of ongoing support to clients post crisis, within the discussion paper it is unclear why the repeat use of these types of services (i.e EI and post crisis) is presented as a shortfall of the current system as these interventions would be aiming to prevent occurrence and re-occurrence of homelessness.

Reasons for repeat usage of SHS services

The discussion paper and presumably the PWC analysis does not investigate repeat usage of SHS by different clients groups, nor does the paper acknowledge that repeat usage of SHS accommodation (let alone other repeat support periods) may in fact be a positive intervention. ***There is no breakdown in the paper on use of SHS crisis accommodation vs SHS transitional accommodation.***

¹ NSW Department of Family and Community Services, 2012 *Going Home Staying Home: Future directions for specialist homelessness services*,p.10

² Australian Institute of Health and Welfare (AIHW) 2008. Homeless people in SAAP: SAAP National Data Collection annual report New South Wales supplementary tables. SAAP NDCA report series 12. Cat. no. HOU 177. Canberra: AIHW.p.5

³ Australian Institute of Health and Welfare (AIHW) 2009. Homeless people in SAAP: SAAP National Data Collection annual report New South Wales supplementary tables. SAAP NDC report series 13. Cat. no. HOU 195. Canberra: AIHW., p.5

⁴ Australian Institute of Health and Welfare (AIHW) 2010. Government-funded specialist homelessness services: SAAP National Data Collection annual report 2008–09 New South Wales supplementary tables. Cat. no. HOU 223. Canberra: AIHW. P.6

⁵ Australian Institute of Health and Welfare 2011. Government-funded specialist homelessness services: SAAP National Data Collection annual report 2009–10: New South Wales. Cat. no. HOU 240.Canberra: AIHW., p.1

Clients maybe moving from an SHS crisis service to an SHS transitional accommodation, this represents a continuum of intervention not ‘churning’.

Also, because of the complexity of domestic and family violence and the use of power and control by the perpetrator, it may take many women a long time to leave relationships that are violent if they are able to at all. There are many reasons for this and it is the woman’s choice. Women accessing refuges may need to access refuges numerous times before they can achieve safety therefore ongoing access to refuges should be viewed as a positive intervention in these cases.

The WRM is not arguing that all repeat usage of SHS is a good outcome for clients, but to make an assumption that all repeat usage is bad and indicative of failures in the service system is too simplistic and fails to acknowledge both diversity of the SHS service system and the diverse, varying and often complex needs of people who are homeless or at risk of homelessness.

Recommendation One

The WRM would welcome the opportunity to work with FACS, PWC and other peaks to develop a more comprehensive understanding of repeat usage of SHS to further inform the reform process.

Access to post crisis support

The third argument supporting the *Case for Reform* notes that many people are not getting the post crisis support they need to maintain stable housing and that design of the current system makes it hard for clients to “continue to receive support after they leave crisis accommodation”⁶.

Once again the WRM is concerned that this assumption is based on data analysis that does not provide a breakdown of SHS responses by target groups or service streams. Nor is there any acknowledgement within this section of the role of other service systems and the existing gaps in other service systems or barriers in accessing these services.

In our view most if not all of our members provide post-crisis support to women and children that have exited their services. This is not to say that some DV SHS services could not be supported to further strengthen the breadth of and length of post crisis services and support offered but again the argument for reform appear to be based on generalised statements and a homogenised view of the SHS service system.

⁶ NSW Department of Family and Community Services, 2012 *Going Home Staying Home: Future directions for specialist homelessness services*,p.10

Indeed some services would be far exceeding the minimum performance requirements as outlined in their service specifications.

Domestic and Family Violence and Homelessness

Women and children's vulnerability to homelessness due to domestic and family violence has consistently been highlighted by SAAP and SHS data. Domestic violence has been the most commonly cited reason for people entering SHS since data collection began.

It also well known that domestic violence is under-reported and we suspect that domestic violence affects many more women and children accessing specialist homelessness services but that this experience is not disclosed. Domestic and family violence is also a commonly reported experience for many people supported by a broad range of specialist homelessness services not just services specifically targeting women and children who have experienced domestic violence. The report from the AIHW SAAP High and Complex Needs Census (NSW) found that for 50% of SHS clients had need for assistance in relation to 'exposure to and effects of violence'⁷. Domestic and family violence was recorded as a the most common circumstance for clients accessing SHS services targeting women and children escaping domestic violence and single women's services, but was also the second most common circumstance for SHS agencies targeting families (40%) and was recorded as a circumstance for 32% of young people accessing youth SHS services⁸. The data from this report indicate that support relating to domestic and family violence is a key need area across many homeless groups not just those accessing SHS services for women and women and their children. Clearly, the impact of domestic and family violence on homelessness and risk of homelessness is pervasive.

While our members are funded as specialist homelessness services they are also specialist domestic and family violence services and are an important part of the service system response to domestic and family violence in NSW. Working with and supporting women and children who are experiencing domestic and family violence and other abuse is their core business. The homelessness or risk of homelessness that is caused by their experience of violence whilst very important to address is often

⁷ Australian Institute of Health and Welfare, 2009, Needs of Clients in the Supported Accommodation Assistance Program: New South Wales; Report on the SAAP "High and complex needs census", 2008

⁸ Ibid,pp.20-1

one of many complex issues that refuges and other domestic violence services will work with women and children to address in order to improve their safety and wellbeing.

Recommendation 2

It is imperative that the *Going Home Staying Home* process of reform occurs in coordination with the development and implementation of the NSW Domestic, Family and Sexual Violence Framework, we have welcomed FACS's acknowledgement of the need for this. The NSW WRM would welcome the opportunity to work further with FACS to align reforms of DV SHS services through GSHS and the development and implementation of the Domestic, Family and Sexual Violence Framework.

Suggested Broad Principles for Reform

- Any reform of Specialist Homelessness Services must be supported by strategies and actions to improve access to and responsive of other service systems and mainstream agencies this includes human and justice service system responses to domestic and family violence.
- Be based on a shared understanding and analysis of the evidence base that examines the different needs and responses to different target groups. Gaps in the evidence base must be acknowledged and where possible addressed.
- Reform will be delivered through a process of genuine transparent consultation and will build on the existing expertise and strengths of the service system, importantly this process;
 - will recognise the need to develop planning and consultation processes at the local, regional and state level that ensure engagement from different service streams
 - Provide structures that enable coordination between SHS reform and other key policy frameworks and plans, such as the NSW Domestic, Family and Sexual Violence Framework

Responses to questions in the consultation paper

1. What are the opportunities to build on existing approaches to providing support to stop people becoming homeless?

Our member refuges provide more than just a bed and support to women and children accommodated at our services. Our members and many other specialist homelessness services provide support and services across the broad spectrum of interventions not only crisis responses.

The NSW WRM strongly supports domestic and family violence prevention activities. Many of our members are heavily engaged in a diverse range of activities that seek to raise awareness about domestic and family violence, whether this is through White Ribbon Day events, advertising campaigns, information days or prevention activities in schools; for example, in the delivery of the Love Bites program that encourages respectful relationships. Events and activities such as these are important not only as prevention activities but they also provide an environment where women who may be experiencing violence will feel more comfortable engaging with specialist domestic violence services, such as refuges. These awareness raising activities and programs act as a type of soft entry point into the service system and complement early intervention activities and case management support and safety planning for women and their children.

Many of our members also undertake a diverse range of early intervention activities to women and children in their local communities. The report commissioned by the Commonwealth Government *Women, Domestic and Family Violence and Homelessness* highlighted some broad early intervention strategies in addition to SHLV models these included improved information and referrals from health services and Police to specialist support services and the provision of outreach and court support to women⁹.

Members of the NSW WRM have been engaged in encouraging partnerships and undertaking these early intervention strategies for a long time. ***Women's refuges in NSW were at the forefront in establishing Domestic Violence Court Advocacy Schemes and continue to be involved the provision of court support to women.*** In addition to providing court support at local courts, the NSW Women's Refuge Movement established the Women's Family Law Support Service in 2007 at the NSW Family Court Goulburn Street registry. ***Many refuges have built partnerships with a diverse range of agencies, including Police and health services, and developed a range of***

⁹ Tually, S., Faulkner, D., Cutler, C., Slatter, M., 2008, *Women, Domestic and Family Violence and Homelessness: A Synthesis Report*, Commonwealth of Australia. P.34

programs to make their services and support accessible to women and children throughout their communities. Indeed women's refuges have been supporting women and children who are not accommodated at their services through the provision of outreach support for many years.

➤ **Some common types of early intervention activities include:**

- **Support groups for women experiencing or at risk of domestic and family violence**

The length of these programs vary from service to service they cover a range of issues in relation to domestic and family violence and other abuse in addition to providing a range of other activities aimed at increasing women's interest and engagement with the groups. Covering such topics as: The Cycle of Violence and services available to women and children, service system responses (e.g legal response) to domestic violence, safety planning strategies, and the impact and effects of domestic violence on children. These groups are beneficial to women as it increases their awareness of the cycle of violence, increase awareness of options available to them to enhance their safety, reduces their isolation, builds support networks with other women and increases access to other services and support provided by refuges and other services.

- **Parenting Support Groups and programs**

These are important programs to support parents to support their children. Parenting programs assist mothers in the strengthening parenting skills and provide information on the effects of domestic violence on children and the impact that violence may have on a mother's relationship with her children.

- **Children's Support Groups**

All WRM member services acknowledge children as clients in their own right and have done so for many years, this acknowledgement and commitment to responding to the needs of children has assisted in the development of a range of responses and services for children. Programs for children who have experienced violence are diverse.

Women's refuges provide a range of child support programs delivered by child support workers and other staff within services. Many of the child support programs have been developed to address the specific needs of children and young people that have experienced domestic and family violence whilst others may have a prevention focus such as Love Bites which aims to promote healthy relationships.

Working with children who are either accommodated by refuges or elsewhere could be viewed as prevention and early intervention as there is extensive evidence that children who experience homelessness are more likely to be homeless later in life.

- **Outreach Support to Women and children in the community** - Refuges provide case management and other support to women and children in the community who are or at risk of experiencing domestic and family violence. Support can be through programs and groups (examples above) or through case management support to women and children which aims to respond individual needs this work includes safety planning for women and children.
- **Shop fronts and Resource Centres** - Some services have access to and operate resource centres and shop fronts to improve access to their services. These centres are often used to deliver a range of programs and provide a safe place for women and children to access information and resources.
- **Court Support to women** -Many of the services in addition to providing court support to service clients also provide seconded workers to the Women's Domestic Violence Court Assistance Schemes. Some women's refuges are funded separately to delivery WDVCAS services. Services also provide support to women through family law processes, which often act as another barrier for women and children achieving safety. Some Sydney based services provide seconded workers to the Women's Family Law Support Service at the Goulburn Street registry.

There is a plethora of prevention and early intervention activities being undertaken and the activities above provide just a general overview.

Example Prevention and Early Intervention Activities of WRM Members

Early Intervention/Transport East Women and Children's Services partnership)

(South

"This project operates a 12 seater bus to compliment early intervention work by addressing isolation and transport issues for women and children attending groups and other activities.

The partnership with Bandara Children's Services continues to prove extremely successful. Bus transport has been provided to children who would otherwise have difficulty attending long day care and pre-school. This service allows children to attend structured learning and play out of the home where they have an opportunity to interact with other children and adults within a supportive environment.

For children where there is violence in the home, attendance at Bandara provides a positive experience which builds self esteem and gives the foundations of life skills which can break the cycle of violence.

Regular attendance at a day care centre can instill a pattern of attendance for later schooling. Education is paramount in addressing and overcoming many social problems affecting our community including family violence.

This transport service also provides a window of opportunity for support workers from Bandara and SEWACS to connect and offer support to families at their home. The increased familiarisation of support services and workers has meant that Aboriginal women are increasingly accessing local support services that they are more aware of and comfortable with."

Source: SEWACS Annual Report 2010- 2011

LoveBites in the Clarence Valley

Clarence River Women's Refuge and Sexual Assault Services are the lead agencies that provide and finance the program, however the LoveBites Program could not survive without the support of local services such as; the GDVLC, DoCs, Reconnect, Youth Accomodation Service (CVCP); Attorney Generals Dept, Police Youth Liasion Officer, Youth Health Liasion, Eduational Beats, Maclean High, Grafton High and South Grafton High. Over 2010 the LoveBites program was delivered to over 400 students across the Valley.

Source: Grafton Domestic Violence Local Committee

<http://graftondvlc.blogspot.com.au>

The Lachlan Domestic Violence Education Program

is a partnership between Forbes Women's Refuge, Police, Community Services, Department of Corrective services and Attorney General's. Under the partnership Police, Community Services, Corrective Services and local courts refer women to the program. The education program is run over six weeks and covers a range of issues in relation to domestic and family violence and the available services and responses to domestic and family violence. Participant evaluations of the program have been positive, with many participants noting their increased understanding of the dynamics of domestic and family violence and the impact this has on their children. A range of other service providers in the region have accessed the program to assist new staff to build understanding of domestic and family violence.

Wimlah Women and Children's Refuge

Freelander Cottage

Freelander Cottage is Wimlah's specialist domestic violence outreach service. This 'safe space' is used for running groups for women and children, women can access the drop in services for confidential one on one support, information, and referral assistance for women who are currently, or who have been in an abusive relationship (domestic violence). Drop in service are also provided at the Springwood Neighbourhood centre every Monday. Freelander Cottage is also used as base and support and is a base for a children's therapist and women's counsellor.

The Drive Program

Aims to empower women by helping them to learn to drive, which in turn brings independence, safety options ,confidence, self-esteem and freedom. The DRIVE program has been devised to help women who have experienced domestic violence to obtain a Drivers Licence and as a result independence to prevent them returning to the cycle of violence. This independence is critical for the women to get their life back on track, especially in geographically isolated areas like the Blue Mountains. We provide support for the women sitting the test phase (L's), and by providing professional driving lessons. We also provide support for them to obtain their Provisional licence.

Source: <http://www.wimlah.org.au/>

The Bathurst Aboriginal Womens Group - Bathurst Women and Children's refuge

The Bathurst Aboriginal Women's Group currently meets at 10:30am til 1:30pm every Monday at the Kelso Community Centre. Bathurst Women and Children's Refuge, Central West Community College, Merinda Rose from Centrelink - Bathurst the women's group.

The group continues to support and empower Aboriginal women in the local community and gives the women a chance to participate in chosen activities and share information and improve the self-esteem of women and their families.

The support group has been designed for and by local Aboriginal women to share their stories and improve networking with service providers.

Source: NSW WRM Annual Report 2010-11

Kempsey Women's Refuge

"Healthy Healing Program" was facilitating in partnership with Aboriginal Health and YWCA. This program sits in the early intervention arena to inform/educate women and combines life skills, healthy relationships and healthy lifestyle within a practical framework. This program will be aimed at young Aboriginal women with children to minimize the risks associated with Homelessness and Domestic and Family Violence. The aim of the program is to inform, empower and ensure the safety at all levels of women and children. Due to the initial success of the project it is now delivered by the Kempsey PCYC on an ongoing basis who were provided with support and resources from original partners.

Speak Out 4 Kids

Is a joint initiative of Kempsey Women's Refuge and Kempsey Family Services. This program has four different components:

- Training to a range of different service providers and foster carers, including schools and early childhood centres. The training provides insight into the impact of domestic and family violence on children, identification and what supports services are available for support. A risk assessment tool is also being developed through this initiative.
- Women's Group – which explores the impact of domestic violence on the children
- Support Groups for Children 8-12 years – enables children to explore their past experience of violence and to develop protective behaviours
- Community Education –awareness campaigns that challenge to acceptance of violence in the Kempsey area.

Tweed Shire Women's Service's

Charmed and Dangerous: "A Woman's Guide to Reclaiming a Healthy Relationship" "This booklet is to share information and resources that may assist women in their journey to achieving and maintaining a healthy relationship; a relationship based on trust, respect, positive communication, honesty and balanced power."¹⁰

This resource is shared with an array of organisations across NSW and QLD with it be adapted include information on service providers in local communities.

2. What are the opportunities to build on existing effective approaches that give homeless people the best possible chance of finding and staying in safe and affordable housing?

Many WRM members have developed partnerships with Community Housing Providers and other transitional SHS Women's Housing Services for a number of years. A survey we undertook in 2009 with our members sought to find out more about partnerships that had been developed between community housing and DV SHS. Just under 75% of responding members reported having partnerships with community housing providers. Most of these partnerships involved the provision of support by women's refuges with community housing providers providing the tenancy management. Again, the SHS State-wide capacity building project found that many SHS providers have partnerships with community housing providers. These partnerships are clearly very valuable for services assisting clients with obtaining and maintaining safe and affordable housing options.

Recommendation 3

The GSHS Reform agenda should seek to build on these existing partnerships and also seek to support and foster new or expanded partnerships between larger community housing providers and SHS.

¹⁰ Charmed and Dangerous: A Woman's Guide to Reclaiming a Healthy Relationship" <http://www.tswomen.org.au/index.php/publications/>

- **Partnerships with Private Real Estate Agents**

As the discussion paper notes consultation with the sector has highlighted discrimination in the private rental market as another barrier to assisting clients to obtain longer term housing. Discrimination by private real estate agents against women and children who have experienced domestic and family violence, particularly Aboriginal women and children was repeatedly reported by DVSHS services at the Sector Capacity Building workshops.

Again, while many SHS clients may face discrimination in the private rental market the Capacity Building workshops and other feedback from our members indicate that women who have experienced domestic violence often face discrimination solely on the grounds of this experience. It is our understanding that Private Rental Brokerage Specialists within Housing NSW have also acknowledged this issue.

The Domestic Violence Support Western Sydney Service and Wimlah Women and Children's Refuge have developed an information pack for real estate agents that provide information on myths and facts about DV, the cycle of violence, the Start Safely program and a regional directory of support services available. The aim is to develop partnerships with selected real estate agents with a view to them accepting Start Safely clients who are being supported by DV SHS. The information pack has been widely distributed in Western Sydney supported by individual discussions with real estate agents. Participants at other SCB forums agreed with the need to form better partnerships with real estate agents, with many noting that regionally specific adaptations of the resource developed by the DVWSS and Wimlah would be useful in this regard.

Recommendation 4

FACS and the NSW WRM promote this resource and its adaptation for DV SHS and other partner agencies. Ideally the rollout of this resource would be better supported through the development of a guide to assist services in engaging private real estate agents but also strengthening partnerships with Private Rental Brokerage Specialists within Housing NSW which aid in the delivery of coordinated support to women utilising the Start Safely subsidy.

Further to this it would be useful to build on the experience of the three DV HAP projects in Western Sydney, the Hunter and the Illawarra to deliver specialist domestic and family violence support to women who have accessed the Start Safely.

- **Post crisis support to women and children**

As we noted earlier in this submission most if not all members provide post crisis support to women and children who have access SHS support and/or accommodation. This support is delivered to clients in numerous different ways and also depends on the client's choice to receive ongoing support. Many of the activities listed in early intervention response above are also provided and

available post crisis. Refuges also provide support to clients to maintain their tenancy through case management support, budgeting groups and resources and implementing programs such as RENT IT, KEEP IT.

3. What are the opportunities to build on existing effective approaches to building and sustaining partnerships with NGOs? And

4. What are the opportunities to improve coordination and integration of the homelessness services system across SHS, mainstream and specialist services?

WRM members have been great advocates within their local communities, they recognise that they in isolation cannot in many circumstances deliver long term safe outcomes for women and children so they engage in a variety of partnerships, networks and interagency committees and in a range of areas they have taken responsibility for establishing and maintaining these partnerships and networks. They have built partnerships with other service providers and these partnerships are diverse, in the main refuges and other domestic and family violence services have sought to build a coordinated service system which includes partnerships with Police, for example. Their success in doing this varies, however and is dependent on the commitment of other agencies. This again highlights the need for integrated and strong service system that includes support, monitoring and transparent reporting of regional actions and structures aimed improving local and regional responses that are clearly linked to a state-wide policy directions and strategies.

Community Partnerships Against Domestic & Family Violence (CPADFV) Project, a service of the Hastings Women and Children's Refuge

CPADFV covers a large regional area defined by the NSW Police Local Area Commands of Mid North Coast and Manning Great Lakes. The combined Commands extend from Nambucca in the North to Gloucester in the South and include segments of six Local Government Areas.

Community Partnerships Against Domestic and Family Violence (CPADFV) has contributed to the strategic whole of government response to domestic and family violence across the Project area. Through promoting coordinated access to support, judicial intervention and evidence based program delivery, CPADFV has become a key addition to the service sector.

Partnership is a key aspect of all services provided by CPADFV. A comprehensive list of the partner agencies and services actively supporting the operation of the support rooms in each location is included below.

Kempsey - NSW Police, Department of Justice and Attorney General, Kempsey Women's Refuge, North Coast Area Health Service, Brighter Futures, North Coast Women's Domestic Violence Advocacy Service.

Port Macquarie –NSW Police Force, North Coast Area Health Service, Hastings Women and Children's Refuge and Brighter Futures.

Taree –NSW Police Force, Hunter New England Area Health Service, Lyn's Place Women's Refuge, Mid North Coast Women's Domestic Violence Court Advocacy Service, Brighter Futures.

- **Domestic Violence Support Rooms**

The primary feature of CPADFV is the operation of 3 domestic violence support rooms overseen by local Steering Committees. The support rooms are co-located with NSW Police in **Taree, Port Macquarie, and Kempsey.**

Referrals to the support rooms for victims of domestic violence incidents attended by Police in CPADFV area are provided through formalised partnership arrangements. Experienced domestic violence support workers operate from the rooms under secondment arrangements to provide support and referral to each victim contacted.

Other projects by CPADV include Love Bites, the 'Men Exploring New Directions' and the concurrent 'Women Exploring New Directions' and the Gloucester Outreach Service.

Website: <http://www.dvportmacquarie.org.au/index.html>

BUILDING BLOCKS

Individualised Approaches

5. What are the opportunities to build on existing good practice in the SHS to implement individualised approaches

Our submission has previously highlighted a range of early intervention and post crisis responses that facilitate individualised responses. Over the previous SAAP agreements a significant emphasis was placed on establishing and continually improving case management support to clients. In the case of women's refuges, case management support and other individualized approaches are provided to both women and children. From discussions with members during this consultation process the newly revised Case Management Resource Manual has been well received by the sector and will support further improved practice in this regard.

The importance of partnerships and structures that facilitate coordinated case management cannot be understated. Whilst there are some good examples of coordinated case management to women

and children experiencing domestic and family violence there is no consistent structures in NSW to oversee the ongoing development and implementation of this. There are a range of other service systems including Victoria that facilitate integration. Additionally, evaluations of UK Multi-Agency Risk Assessment Conferences (MARAC's) have found that they have the good potential to improve victim safety and reduce re-victimisation¹¹. MARAC's bring together representatives from Government and non- Government agencies to share information on high risk victims and develop coordinated action plans¹².

The WRM acknowledges that there will be learnings from the DV HAP projects and indeed some other existing projects such as the Community Partnerships Against Domestic Violence that refugees are heavily engaged. These projects and services have developed structures and partnerships that have further enhanced capacity for flexible individualised responses. It will be important to build on these examples and to consider adaptation of these structures in other regions. The Northern Region of WRM members have already commenced discussions on how to further strengthen and formalise partnerships through the development of Alliance or Consortia models both as a region and with other partners in their communities.

Recommendation 5

FACS (Housing NSW, Community Services and Women NSW) work with the NSW WRM and other agencies to investigate the development of models to deliver coordinated case management to women and children who are homeless or at risk of homelessness due to domestic and family violence

6. What are the main design principles that need to be embedded in these individualized approaches?

Principles identified through the consultation process included

- A One Size Fits All funding model to deliver individualized responses will not adequately meet the needs of different target groups or regional areas, and build on the existing expertise of knowledge of DV SHS
- The capacity and responsiveness of SHS in responding to individual client needs must be supported by integration service systems and structures, including service system responses for interrelated services systems, including domestic and family violence, child protection.
- The capacity to respond to individual needs is interdependent on the availability of services. Therefore, there is a need to monitor the availability of appropriate services, identify gaps and work together across Government and the NGO sector to address these gaps.

¹¹ Steel, N., Blakeborough, L., and Nicholas, S, Supporting high-risk victims of domestic violence: a review of Multi-Agency Risk Assessment Conferences (MARACs), : Research Report:55, <http://www.homeoffice.gov.uk/publications/science-research-statistics/research-statistics/crime-research/horr55/horr55-report?view=Binary>, p.iii

¹² Ibid, p.i

Recommendation 6

Given the focus on 'client centred support packages' throughout the discussion paper ongoing consultation occur with the sector to facilitate the development of design principles that mitigate a diverse range of risks. How these packages are administered for particular target groups needs to be well thought through. The Office of the WRM is keen to contribute to the discussions through the Sector Reference Group on the principles that need to be embedded in these approaches.

7. What are the main implementation issues and risks that will need to be considered in developing individualised approaches?

One of the most commonly cited concerns made by our members and other SHS services during this consultation is that any resultant changes to funding and delivery arrangements will jeopardise existing strengths of specialist services and that there is a homogenised view within Consultation Paper of what the SHS deliver regardless of regional and target group differences. This has been raised by many of our members to be of particular concern for women and children who are homeless or at risk of homelessness due to domestic and family violence.

Some of the risks that have been identified in relation to some funding approaches and models aimed to providing more individualised approaches are:

- Funding will be provided to a reduced number of agencies that may not have the diverse range of skills, expertise, knowledge, links with other service systems and services necessary to develop an integrated service responses for the diverse drivers and experiences of homelessness. The Auditor General's report into 'responding to domestic and family violence' also found that large NGOs alongside health and child protection services were less engaged with local coordination structures¹³.
- Too much emphasis in the funding mix on individual support packages may compromise the delivery of a range of other prevention and early intervention activities operated by SHS for women and children experiencing domestic and family violence and communities. As noted earlier in this submission there are a diverse range of prevention and early intervention activities already provided by many DV SHS that improve access to the service system and specialist support. **Activities and services such as support groups, resource centres and awareness raising activities are important not only as prevention and early intervention activities but they also provide an environment where women who may be experiencing violence may feel more comfortable engaging, one-on-one, with specialist domestic violence services and workers.** Additionally as the Auditor General notes these interventions "inform vulnerable women that they are entitled to be free from

¹³ NSW Auditor-General, 2011, responding to Domestic and Family Violence, Audit Office of NSW, p.29

violence”¹⁴. Early intervention responses for women and children experiencing violence need to be available not just to women and their children who have made contact with support services but also those women for whom admitting domestic and family violence is shameful¹⁵. ***If the delivery of these activities is compromised then the capacity of the service system, to provide information to victims that assists them in understanding and identify that they are experiencing domestic violence and that there are support services available, will be reduced.*** The importance of the provision of information to victims is acknowledged in the recent parliamentary inquiry as “fundamentally important to addressing barriers to reporting such violence” and facilitating access to services¹⁶.

- If the delivery of prevention and early intervention activities is compromised as identified above, then the additional barriers to service already experienced by Aboriginal, CALD, older women and women with disabilities will be exacerbated.
- Broad based coordination groups with diverse target groups such as some that have been established through HAP projects may mean that ***there is a lack of specialist knowledge and understanding of domestic and family violence and risk assessment processes to identify and respond to the safety and support needs of women and children.*** It is essential that these groups have specialist domestic and family violence services involved who have already established partnerships with a range of agencies and services responding to domestic violence. It is our understanding that engagement of specialist DV services in these groups has been inconsistent across regions.
- Reports on the implementation of Individual Support Packages in the disability sector have identified particular risks for vulnerable people in relation to use of Individual Support Packages. The Victoria Audit Office Report found that people who have difficulty communicating their own needs; or do not have support people to assist in decision making processes and monitor services; or their support people do not have understand the implications of their decisions, may be at risk of their packages not truly reflecting their needs instead reflecting the beliefs of others¹⁷. As many homeless people and those at risk often lack few support networks and are at heightened risk of exploitation and abuse by others, the further development of these models through GSH and how packages are administered must be very carefully considered.

¹⁴ Ibid

¹⁵ Weeks and Oberin in Tually, S., Faulkner, D., Cutler, C., Slatter, M., 2008, Women, Domestic and Family Violence and Homelessness: A Synthesis Report p. 32

¹⁶ New South Wales. Parliament. Legislative Council. Standing Committee on Social Issues, Domestic violence trends and issues in NSW, p.93

¹⁷ Auditor General Victoria, 2011, Individualised Funding for Disability Services, Section 3.7 <http://www.audit.vic.gov.au/publications/20110914-Disability-Funding/20110914-Disability-Funding.html#s37>

8. What are the possible funding and delivery arrangements that would support implementation of individualised approaches?

As we have highlighted already that services are already significantly engaged in a diverse range of activities and support provision that does enable individualised responses it would be remiss not to point out that while current funding arrangements may have some shortcomings it has not impeded the capacity of many SHS to develop flexible responses. Many SHS have over time adapted their practices to respond to the needs of their client groups and communities. ***We acknowledge, the development of innovative practices is not consistent across all of SHS and that the ongoing development of flexible responses needs to occur through collaboration between FACS, service providers and peak bodies.*** There is considerable goodwill amongst our members to explore a range of approaches that allow for the provision of flexible support that respond to clients' individual needs instead service delivery and support being constrained by rigid funding models. Ultimately a mix of funding and delivery arrangements should be explored in this process. Again this mix would depend to the target group, service stream and region.

Recommendation 7

In relation to support packages for women and children experiencing domestic and family violence who are homeless or at risk of homelessness we would consider it advantageous for FACS to work in partnership with WRM to explore the use of support packages through the existing WRM regional network structure and to consider coordination arrangements required with other local specialist and mainstream providers.

Again, it is critical however, that changes to the service system do not undo many of the existing strengths of the service and also do not compromise access to provision of intensive support provided by refuge accommodation.

STREAMLINED ACCESS

The WRM agrees with the points made in the consultation paper that streamlined access arrangements should ensure that:

- Clients are able to seek the same support services regardless of the initial entry point;
- Consistent assessment
- Streamlined referrals

These points again underscore the importance of the need to strengthen understanding, assessment and responses from mainstream agencies and the need for coordination with other key policy frameworks, services and programs responding to domestic and family violence.

Coordination with the NSW Domestic and Family Violence Framework will be critical. ***The NSW WRM is looking forward to working collaboratively with Government and other agencies in the development and implementation of the new Domestic and family Violence Framework.***

This Framework will no doubt seek to address the recommendations from the Auditor General's Report and the recent Parliamentary Inquiry to develop a more integrated response to domestic and family violence including access, assessment and referral arrangements.

In relation to the suggested infrastructure and services needed to support streamlined access, the following points were made during the consultation process and other consultations with members:

- Some members expressed a strong interest in an on-line vacancy management system, the idea of a vacancy management system has also been supported by some refuges from the metro central region during meetings with Community Services (Metro Central) and DV Line;
- There was significant caution and opposition expressed by numerous members about shared on-line case management systems between agencies as this is far more likely to compromise the safety of

women and children who have experienced domestic and family violence (these systems were suggested by forum participants from other service streams or government).

- The need to develop improved understanding of the range of services, not just SHS, within different regions was highlighted in numerous DV workshops as part of the SHS Capacity Building Project, and numerous ideas to address this were suggested at these forums including on-line directories and increased use of HS Net.

9. What are the opportunities to build on existing good practice in the SHS sector to build a streamlined access system?

Many women's refuges have established a range of formal partnerships to facilitate access to their services for victims of domestic and family violence within their regions. Many refuges already partner with Police to streamline referral process through the Yellow Card system, many of these partnerships were identified through the Capacity Building Forums in 2011. As highlighted previously three of the mid-north coast women's refuges are involved in CPADV which provides Domestic Violence Support Rooms co-located with NSW Police in **Taree, Port Macquarie, and Kempsey.**

Referrals to the support rooms for victims of domestic violence incidents attended by Police in CPADFV area are provided through formalised partnership arrangements. Experienced domestic violence support workers operate from the rooms under secondment arrangements to provide support and referral to each victim contacted¹⁸. The WRM also understands that Clarence River Women's Refuge and Outreach Services and Warrina (Coffs Harbour) are also engaged in a similar project within their region with other partner agencies.

WRM considers that it is important that these arrangements are not compromised by the reforms. Additionally, the ***NSW WRM has been working with the CS Metro Central Partnership and Planning, the DV Line and DV SHS agencies to improve women and children's access to women's refuges and other support services.***

Through these meetings refuges, the DV Line and Community Services are developing strategies to achieve the following outcomes:

- To increase capacity of service system to intake after hours.

¹⁸ Hastings Women and Children Refuges

- Provision of support to women and children accommodated in motels after hours. There has been discussion in relation to sharing some available resources (financial and human resources) to facilitate increased outreach support to women and children accessing motel accommodation the DV Line brokerage funds
- Improve agencies understanding of each other's service capacity and limitations e.g infrastructure/disabled access.
- Improve communication system/information sharing systems.

Both services and the DV Line have already reported improved access and relationships partly as a consequence of the information sharing occurring at these meetings. The NSW WRM Working Party and Office also meet bi-monthly with the DV Line to discuss referral process and practice issues. Both the NSW WRM and the DV Line have recently agreed on the need to work more collaboratively together to improve assessment processes, information exchange and referrals for early intervention activities and support provided DV SHS.

10. What are the main design principles that need to be embedded in the SHS access system?

Coordination between streamlined access arrangements for DV SHS with the access arrangements established through the forthcoming NSW Domestic and Family Violence Framework. Need for safeguards in relation information exchange to prevent breaches in privacy and confidentiality. ***Any new system must be designed with DV SHS sector and Women NSW.***

11. What are the main implementation issues and risks that will need to be considered in developing improved access arrangements?

Throughout this consultation process numerous members have expressed concern that a single point of entry to the service system, whether this be state or regionally based for all homeless people, could compromise the safety of women and children experiencing domestic and family violence. It is one thing to indicate that FACS will establish training programs and processes for identifying domestic and family violence and making appropriate referrals, actually succeeding in embedding these processes in a service/s responding to a high volume of calls and requests for assistance for diverse target groups will be quite difficult.

The DV Line has specialist trained counsellors and provides referrals to women's refuges along with many other agencies responding to domestic and family violence. It is also important to point out that many women experiencing domestic and family violence might not even recognize that they are at risk of homelessness or experiencing homelessness. Whilst there is a good understanding of primary, secondary and tertiary homelessness in Government and the community sector there are still many in the general community who think of homelessness as only 'rough sleeping'. Therefore some victims of DV would not identify that central intake point for homelessness services would even be able to refer them to domestic and family violence services.

There is also concern within the WRM that any moves toward a single point of access to SHS will disrupt existing good practices and partnerships within regions and target groups. We note that the Parliamentary Inquiry in to DV report indicates that FACS had informed the committee that in relation to homelessness it was working toward providing a single point of access, we reiterate that processes and practices implemented to streamline access need to be done in consultation with the sector.

BETTER PLANNING AND RESOURCE ALLOCATION

The consultation paper raises questions on how demand should be measured. Questions on how demand should be measured is indeed very important, unfortunately the consultation paper has provided no information on how FACS has worked with PWC on developing a model for measuring demand. The delay in the provision of these reports to the sector in this consultation period makes it very difficult to engage in an open and robust dialogue between sector and Government.

It will be important to continue these discussions between Government, peaks and the sector once this initial consultation period concludes and further information is made available. The ***WRM also considers that quantitative data can only really tell you so much and the assumptions made from the data should be tested within regions.*** These conversations need to allow for the identification and clear articulation of gaps in the evidence base.

For example, we consider that there are limitations on ABS Counting the Homeless Census data and the methodology used by ABS is a matter of considerable contention. The ABS data can only give counts of homeless people and not on the reasons as to why they are homeless, *i.e. what are the drivers to people becoming homeless*, nor does it give you any indication of people at risk of homelessness. Turn away figures from SHS can give some indication on the demand on services currently, however again we would contend that turn away data is not truly reflective of the demand on DV SHS services as the DV Line does not supply data to AIHW. Not having some process in place to record these requests made through the DV Line will result in a significant undercount of the number of women and children who require the increased safety that refuge accommodation

provides, as a significant proportion of referrals (particularly in the Sydney region) come through the DV Line.

Recommendation 8

The DV Line contribute data to the SHS National Data Collection.

Another issue to consider in relation to demand on DV SHS is the anticipated increase in demand on their services following the development and implementation of the NSW Domestic and Family Violence Framework. Parliamentary Committee on Social Issues recommended through its Inquiry that “the NSW Government actively plan for an increase in demand for services that will arise from the reforms under the NSW Domestic and Family Violence Framework” furthermore “the planning should include the establishment of mechanisms to effectively track demand for and usage of services”¹⁹.

12. **What are the opportunities to build on existing regional planning and resource allocation processes? &**
14. **How can services and consumers be better engaged in regional planning processes? &**
16. **What are the possible planning and procurement arrangements that would support better resource allocation decisions?**

The consultation paper points to considerable regional planning work already occurring from which, to build on including Regional Homelessness Action Plans and the NSW 2021 Regional Action Plans along with Homelessness Mapping reports. At the risk of sounding repetitive, ***it is important that this reform process acknowledge the differences across regions and service streams***. Planning and resource allocation arrangements made through this process will inevitably have an impact, for better or worse, on the ability and capacity of communities and regions to respond to domestic and family violence and vice versa. Currently, implementation of Regional Homelessness Action Plans are led by Regional Homelessness Committees, how successfully these operating and their willingness to engage in ongoing partnership and dialogue with SHS services is not consistent across regions or service streams. This issue must be addressed if these committees are to play a leading role in service planning and subsequent resource allocation decisions. Other concerns about RHC’s are as follows:

- Membership of committees is inconsistent and there was no transparent processes of appointment to committees,

¹⁹ New South Wales. Parliament. Legislative Council. Standing Committee on Social Issues, Domestic violence trends and issues in NSW, p.135, recommendation 29

- numerous committees lack membership of DV SHS services or DV Regional Coordinators;
- engagement, information flow and reporting of RHC's to specialist homelessness services or any other services is not consistent across regions

Again, the 'who and how' SHS interact and coordinate their services with other agencies will very much depend on their target groups, but obviously with some commonalities. However it will be highly beneficial to consider mechanism to ensure engagement and input into planning processes across service streams, target groups and different communities with regions. ***The point about needing to consider the needs of different towns within regional locations was made quite clearly by service providers at the New England, North Coast and Western NSW consultations.*** As participants noted at the Orange forum what is needed in Orange and Bathurst is differ immensely from what is needed in remote Aboriginal communities in the far west of the State it is therefore essential to ensure that remote communities and service providers are engaged in this process.

The question on how consumers are engaged in regional planning processes should be considered at both the central level but also regionally. Consideration must also be given to how consumer engagement at the regional level can also feed into how consumers are engaged at the state-wide level. ***It is important to ensure that different target groups are represented but also that the different experiences of people experiencing homelessness in metro, regional, rural and isolated areas are taken into consideration.***

13. What are the main design principles that need to be embedded in future planning and resource allocation arrangements?

- The evidence used to inform planning and resource allocations is sound, and the methodology used for analysis is transparent;
- The strengths and limitations of the current evidence base is identified and gaps are addressed wherever possible
- Planning and resource allocation occurs through consultation and collaboration with the sector taking into account different service streams, population groups and locational differences between regions;
- Planning and Resource allocation decisions occurs in coordination of other key service systems including domestic and family violence and child protection at both the state and regional level

14. What are the main implementation issues and risks that will need to be considered in future planning and resource allocation arrangement?

Numerous implementation and risks have already been highlighted in the above responses.

15. What are the possible planning and procurement arrangements that would support better resource allocation decisions?

The NSW WRM acknowledges that there are some shortfalls in both planning structures and allocation processes this has arisen due to historical funding arrangements and lack of coordination between planning and allocation arrangements. The current performance based contracting system, however does not provide an accurate picture of what Government is purchasing as compared to what is actually delivered by many services. Nor does the data from SHS Collection provide sufficient information on client outcomes. Ultimately, service monitoring and review should include measures for client outcomes however developing these will be a very complex task as client outcomes will also depend on the effectiveness of the entire service system/s, acknowledgement of the significant barriers for accessing and sustaining long term housing and complexity of client needs.

Promote and Support Quality Improvement

- 17. What are the opportunities to build on existing quality improvement initiatives?**
&
- 18. What are the priorities and actions that should be pursued to promote and support quality improvements?**

As acknowledged throughout the consultations there are a range of existing processes that provide support for quality improvements and regulation of SHS. As the consultation paper notes performance based contracting is a potential enabler of quality improvement, additionally services should be complying with the CS Good Practice Guidelines and many SHS services have now become registered housing providers. It will be important to ensure that reporting for each of these systems and any future processes do not result in duplication of reporting and a further increase in red tape.

Whatever reforms occur in this area through GHSB must be aligned with the anticipated National Quality Framework. The NSW WRM provided submissions on the development of a NQF during stage 1 and 2 of consultations. During this process the WRM stressed that the central consideration of the development, implementation and monitoring of the NQF must be on ensuring that the NQF and each component of it actually improves outcomes for homeless people or those at risk of homelessness including women and children experiencing family violence. We noted that during both the development of the NQF and throughout its implementation Governments and service

providers should be continuously analysing whether each component of a NQF and the framework as a whole will actually improve services to clients, in particular will the NQF contribute to improved integration between systems and services and how will the success of the NQF or (other quality frameworks) be measured?

The initial frustration that was felt by women's refugees in relation to the PMF was that it was not reflective of their core business will most likely be applicable to other quality frameworks if it only provides for a broad set of generic standards that cover all service types and target groups. This issue was addressed in the PMF by inclusion of specific targets and measures for women and children experiencing domestic and family violence.

There are several ways that quality frameworks, such as the NQF, could reflect the specialist role of homelessness services targeting women and children experiencing domestic and family violence, that supports the ongoing delivery to quality services to this client group. The NSW WRM suggested that the development of a broad set of standards accompanied by practice guidelines for particular specialist services potentially useful in this regard. This will assist agencies in the ongoing provision and improvement of quality services to their target group/s whilst not placing an additional reporting burden on services. The potential downfall of this, however is that ongoing service monitoring in relation to practice guidelines is likely to decrease over time unless there are sufficient resources and practices in place to encourage service providers to continually reflect on their practices and how they align with the practice guidelines.

As noted the WRM noted in its NQF submission, whatever frameworks or models that are developed to promote quality improvement it is important that these:

- Recognise that, a stable and adequate funding environment is an essential component to responding to homelessness and driving ongoing service improvement. The NQF must be used to support and enable services to further develop and strengthen structures and mechanisms to provide ongoing service improvement.
- Not disadvantage small NGOs by creating any unnecessary financial and administrative burden. The value of small NGOs cannot be underestimated. Small NGO's significant strength is their ability to be able to respond quickly to changing and emerging needs with their local communities and to involve community members and groups in the ongoing development and delivery of services. Quality Frameworks and funders should seek to build on these strengths. The WRM notes that numerous sector support initiatives have been used in other jurisdictions where quality frameworks have been implemented. Sector support should include direct support to agencies, support for peak bodies to

further sector development, funds to support training and information sessions and access to e-learning. The WRM would welcome the opportunity to provide further input into what support would be appropriate during this reform process.

- It must be culturally appropriate. The WRM recalls a presentation at the 2010 Homelessness Conference by an Indigenous homelessness services who spoke on their experience with accreditation. Some of the key issues with accreditation that the service observed was that accreditation providers had a limited understanding of cultural differences across communities and services; a lack of understanding of the 'around the clock' work done by Aboriginal service providers; the use of inappropriate language; and the resources required to become accredited .
- Must be flexible and enabling. If services do not meet the required standards they must be provided with adequate time and support to address identified issues
- Must be coordinated with monitoring and reporting on actions of mainstream and allied services

Intersection of quality improvement between SHS and the Domestic and Family Violence Framework

Again coordination between GSHS Reforms in this area and the forthcoming Domestic and Family Violence Framework will be critical and reduce the risk of cumbersome reporting processes that duplicate one another. The Parliamentary Inquiry report into DV: Trends and Issues notes the current work being undertaken by the Department of Attorney Generals and Justice in relation to the establishment of standards across a range of agencies, including the Women's Domestic Violence Court Assistance Scheme. In addition to this the Parliamentary Committee has recommended the establishment of standards for all Government and non-Government agencies; the development of a comprehensive monitoring system; and a single reporting mechanism across agencies and programs.²⁰

²⁰ New South Wales. Parliament. Legislative Council. Standing Committee on Social Issues, Domestic violence trends and issues in NSW, p. 88, Recommendation 19

Industry and Workforce Development

19. **What are the opportunities to build on existing industry and workforce development initiatives?**
20. **What are the priorities and actions that should be funded under the Industry and Workforce Development Strategy?**

There are a diverse range of industry and workforce development initiatives occurring that SHS services are engaged with at both regional and state wide levels. Some of these initiatives would be shared across all SHS's and no doubt other NGOs and some would be specific to different service streams and target groups. For example, many of our members access training opportunities provided through the Education Centre Against Violence and in some of our regions WRM members work collaboratively with each other and other providers to host ECAV training in their own regions. Additionally, WRM Child Support Conferences have a strong focus on ongoing learning and development in relation to working with children and young people, for example at the last WRM Child Support Conference participants engaged in a one day training workshop to assist in the facilitation of the Love Bites program to schools and other facilities. The WRM State Conferences also provide a mix of learning and development opportunities with sessions and information on policy development, information sharing on good practice approaches and programs. Industry and Workforce development is not only accessing training as highlighted in the consultation paper and the suggestions identified in the consultation paper all have merit. However it is difficult at this stage to prioritise what actions should be pursued because the roadmap for reform has not yet been developed and the particular needs of regions and service streams may well vary. It will be important not to re-invent the wheel through this process there are a number of workforce and industry development issues that are shared across a range of sector and NGOs.

However, in relation to training needs the State wide Sector Capacity Building Forums indicated a desire to in numerous regions to improve partnerships with Aboriginal organisations and services from CALD backgrounds and for further learning and development opportunities for improving cultural competency of staff within SHS. A number of SHS would already have sought to address these issues and the WRM has maintained specialist delegates positions on its Working Party (CALD, Aboriginal, Children, Older women and Lesbians), The Walan Jineras which is the Koori Support Group within the WRM has arranged two Aboriginal cultural camps for workers within the WRM.

Working with Children

The WRM and its members have actively sought to continuously improve responses to children accessing women's refuges. Women's refuges and safe houses within the WRM, have for many years identified accompanying children as clients in their own right and focus on providing opportunities for early intervention/prevention where child protection issues have been identified, as well as providing services that aim to improve the safety of both women and their children where domestic and family violence has been experienced.

Child support workers in these services provide protective behaviours training for children, assist parents/carers with parenting skills, provide age appropriate support groups/activities, identify children at risk and refer them on as appropriate, provide training to service workers and promote child-awareness practices, and form connections with other service providers to establish a more integrated response for children.

There is a significant amount of evidence that people who experience homelessness at a young age or more likely to experience homelessness late in life. The recent research *Journeys Home* again found this to be the case, it has also found that by far the most common reasons for first becoming homeless was violence or family breakdown²¹. It is therefore, critical that the GSH reforms also develop strategies to strengthen responses to children across SHS and do not compromise the existing strengths of women's refuges in the delivery services and support to children.

Recommendation 9

FACS work with the NSW WRM to develop workforce development strategies for working with children to support service provisions and interventions across all SHS's.

Governance Structure

The paper sets out that the consultation process for the reforms will be conducted by engaging a range of consultative mechanisms as set out in a governance structure - including a Sector Reference Group and a Panel of Experts. WRM welcomes the opportunity to engage in the Sector Reference Group alongside other relevant peak organisations. It is also acknowledged that the Panel of Experts is not envisaged to include advocates from specialist areas already informing the process via the Sector Reference Group mechanism. However, WRM would argue strongly that given domestic violence is the most common reason for homelessness, the Panel of Experts should

²¹Scutella, R., Johnson, G., Moschion, J., Tseng, Y-P, Wooden., M 2012, *Journeys Home Research Report No.1: Wave one findings*, Report prepared for the Australian Government Department of Families, Housing, Community Services and Indigenous Affairs, University of Melbourne, p.3

include at least one member who has expertise in the field of service delivery and/or leadership in models that demonstrate best practice and innovation for women and children escaping domestic violence. This could be one or more representatives who work directly in the field and WRM would be keen to advise in that regard.

Recommendation 10

That the NSW WRM be invited to nominate at least one candidate for a position on the Panel of Experts who has experience in innovative and best practice approaches for working with women and children experiencing domestic violence.