



**Submission on the DHCS discussion paper:**

***The Road Map: A discussion paper on the way forward for ACT homelessness services and related services***

**Chapters 2, 3 & 5**

## About ACTCOSS

ACTCOSS acknowledges that Canberra has been built on the traditional lands of the Ngunnawal people. We pay our respects to their elders and recognise the displacement and disadvantage they have suffered as a result of European settlement. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contribution to the ACT community.

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

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

ACTCOSS' objectives are a community in which all people have the opportunities and resources needed to participate in and benefit from social and economic life and the development of a dynamic, collaborative and viable community sector.

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

ACTCOSS receives funding from the Community Services Program (CSP) which is funded by the ACT Government.

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

### Contact Details

Phone: 02 6202 7200  
Fax: 02 6281 4192  
Mail: PO Box 849, Mawson, ACT 2607  
E-mail: [actcoss@actcoss.org.au](mailto:actcoss@actcoss.org.au)  
WWW: <http://www.actcoss.org.au>  
Location: Level 1,  
67 Townshend St,  
Phillip, 2606, ACT.

Director: Roslyn Dundas  
Deputy Director: Kiki Korpinen  
Policy Officer: Natalie Oliver

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## Acronyms and Abbreviations

ACTCOSS	ACT Council of Social Service
AMC	Alexander Maconachie Centre
CIS	Central Intake Service
CWL	Common Waiting List
DHCS	Department of Disability, Housing and Community Services
HACT	Housing ACT
MOU	Memorandum of Understanding
PSU	Psychiatric Support Unit
OSHS	One Social Housing System

## Summary of Recommendations

- That DHCS follow the engagement policy outlined in the ACT Government community engagement manual and allow appropriate time for all consultation processes
- That the Road Map and future consultation and discussions papers relating to homelessness be available from the ACT Government's Community Engagement website
- That DHCS respond to all submissions received regarding the Road Map and ensure future consultation are clear on purpose and focus
- That DHCS engage with the homelessness sector in the development of the assessment tool for the CIS
- Thorough procedures and MOUs will need to be developed to guide relationships between the CIS and homelessness services, especially in regards to assessment and allocation
- Ensure there are mechanisms for homelessness services to offer feedback to the CIS, particularly in relation to inappropriate referrals and allocations
- That the CIS be provided by a community-based service provider with local knowledge and expertise
- Fund the CIS to have the capacity to maintain appropriate staffing levels
- Ensure that the CIS staff receive appropriate experience and training, including in cultural awareness and domestic violence
- Recommend the CIS employ Aboriginal and Torres Strait Islander staff
- Resource the implementation of a real-time vacancy list including the necessary IT upgrades for services and training for staff
- Implement a state-wide free-call number for the CIS
- Ensure there is 24 hour support and information available to people trying to access the homelessness sector when the CIS is closed
- Resource the CIS to provide brokerage to people in crisis where there are no vacancies available

- Develop MOUs and protocols for the CIS and relevant homelessness services prior to the start-up of the CIS
- Apply a phase in period to the CIS and a thorough review after 6 months
- Continue the oversight of this process through Joint Pathways
- Allow some flexibility for people to access community housing via other means if they are unwilling to access a Common Waiting List managed by Housing ACT
- Provide multiple access points for lodging applications to the Common Waiting List
- Ensure that the new application process is as simple as possible for applicants and support providers
- Provide appropriate support with the application process to people with low literacy levels
- Provide support to existing applicants who may need to re-apply to be placed on the CWL
- Ensure existing applicants are communicated with effectively about the process involved in merging the current lists
- That Disability Group Homes not be included in the Common Waiting List
- Apply a 12 month trial period to the implementation of the Common Waiting List followed by a formal evaluation
- Ensure ongoing meetings between Housing ACT and Community Housing Providers are maintained to discuss the implementation and operation of the CWL

## General Comments

ACTCOSS thanks the Department of Disability, Housing and Community Services (DHCS) for the opportunity to provide feedback on *The Road Map*. This submission focuses on chapters two, three and five.

There are a range of inherent issues in the application of the 'Road Map' which will be addressed in response to chapter one, such as literacy, mental health, alcohol and other drugs, and the relationship of these initiatives with the 'no exit into homelessness strategy'. There will need to be significant work done, developing appropriate responses regarding these issues before implementation of the Central Intake Service (CIS) and the Common Waiting List (CWL) to ensure they are accessible to all vulnerable people.

Very little cross-referencing has been made available between the chapters in *The Road Map*. Further clarity is needed about the links between these initiatives, for example how does the Central Intake Service interrelate with the Street to Home project, and how does the Common Waiting List interrelate with Housing Support Services?

## Consultation

ACTCOSS is concerned about the limited amount of time provided for feedback to these discussion papers, and the time of year this consultation is occurring in. Genuine consultation allows sufficient time for the community to actually engage with the issues at hand. We note the ACT Government Community Engagement Manual states:

The timing of any engagement activity is crucial to its success. Activities undertaken at inappropriate times (eg during school holidays or over the Christmas/New Year period) or within extremely short timeframes (eg less than 6 weeks) are counterproductive and minimise the ability of many to participate.<sup>1</sup>

We welcome the Department's statement in *The Road Map*:

The vision of the CIS will be co-created by government and the homelessness sector to guarantee the maximum buy-in possible. This will be a crucial element in the project's success.<sup>2</sup>

Buy-in from the homelessness sector is essential to the project's success, and the level of the sector's buy-in will be affected by how much the sector is able to co-create the vision of the CIS. However, ACTCOSS is concerned the inadequate timeframes allowed for responding to the discussion paper and the short implementation timeframes are not providing the sector sufficient opportunity to 'co-create a shared vision'.

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<sup>1</sup> ACT Government (2005) *Your guide to engaging with the community: ACT Government community engagement manual*, page 6.

<sup>2</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 17.

It is also of concern that the Road Map has not been accessible from the ACT Government's Community Engagement website.

**Recommendations**

- That DHCS follow the engagement policy outlined in the ACT Government community engagement manual and allow appropriate time for all consultation processes.
- That the Road Map and future consultation and discussions papers relating to homelessness be available from the ACT Government's Community Engagement website.

ACTCOSS has undertaken limited discussions with the homelessness sector on the issues presented in chapters 2, 3 and 5 of the Road Map. While the Road Map indicates many of the projects outlined in these chapters have been through development or consultation with the sector, there is concern this did not happen in a clear or focused way. Discussions with the sector on the CIS and CWL have raised a number of questions, many of which are contained in this submission. Clarity on the next stages of development of the CIS and CWL and future engagement with the sector is required to help build relationships necessary for the delivery of these new initiatives

**Recommendation**

- That DHCS respond to all submissions received regarding the Road Map and ensure future consultation are clear on purpose and focus.

## Chapter 2 – Central Intake Service

ACTCOSS welcomes the introduction of a Central Intake Service (CIS) as an additional pathway for access to the homelessness system. Having one central number where a range of information and support can be obtained will improve accessibility for many people and timeliness of response.

The CIS is not proposed as the exclusive pathway into the homelessness service system and other entry points will continue to be available for people who choose to use them. If it were the exclusive pathway significant concerns have been expressed by the homelessness sector. Situations where a suitably assessed individual presenting at a homeless service with a vacancy would be asked to contact the CIS and then be referred back to the agency where they had originally presented are to be avoided. This unfortunate situation has happened regularly in some Victorian regions under the 'Opening Doors' model<sup>3</sup>. There will be individuals who want to access a particular service directly as they may have an existing relationship with that service or may have had it recommended to them.

There are some concerns requiring clarification, especially about how the CIS will relate to other methods of access to the system. It is unclear how the CIS will be stopped from becoming the only pathway and not replace other referral channels when the CIS has a role in assessments, managing prioritisation and allocation of vacancies. Sector representatives have questioned what the process will be for specialist homelessness services to refer exiting clients back in to the broader homelessness system (eg. if a client is evicted from a service or is ready to progress to a more independent service. Should these referrals be through the CIS or can they contact other agencies directly?) Greater clarity is necessary as to how all access routes inter-relate. This will need to be communicated effectively to the homelessness sector as the CIS is developed.

### Prioritisation

There are significant concerns with the proposal that the CIS will manage prioritisation. ACTCOSS understands the need to triage, however issues have been raised regarding needs-based allocation. In some circumstances one applicant may present with a greater need but another applicant may be a better fit for a particular vacancy. There are also issues relating to household dynamics and workload in the receiving services. Most services will try to accommodate clients with a range of varying support needs rather than accommodating all clients with high and complex needs.

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<sup>3</sup> Opening Doors is Victoria's Homelessness Service Co-ordination model. There are some differences in how it has been applied in regional operations.

## Assessment

Clarity is needed as to how the assessment process of the CIS will take place. What assessment tool will be used by the CIS and how will that fit in with assessment processes already used in homelessness services? Further engagement is required on what the Homelessness Sector wants the CIS assessment tool to cover.

### Recommendation

- That DHCS engage with the homelessness sector in the development of the assessment tool for the CIS.

## Allocation

The Road Map indicates the CIS will have an allocation role. Through consultations ACTCOSS has been made aware of considerable concern from specialist homeless services about how allocations from the CIS will take place.

Who decides which vacancy is suitable for the applicant, and whether that applicant is suited to a particular vacancy? These questions can not be the sole purview of the CIS. ACTCOSS is pleased with the Department's acknowledgement that allocation needs to happen in collaboration with the service and the client.<sup>4</sup>

Allocations to programs such as Housing First may work well from the CIS. However, when dealing with any congregate living situation or target specific provider, allocations can not occur without the collaboration and agreement of the service provider. Even if the CIS staff have thorough assessment criteria for each service, they would have no understanding of the particular house dynamics at that time which may directly affect whether an applicant is suitable for a particular vacancy or not. Services have a primary duty of care to people already accommodated within their service. Some homelessness services with individual properties have expressed similar concerns. Even if the CIS undertakes an initial assessment, the homelessness service may still need to meet the applicant and conduct further assessment to inform whether the current vacancy is the best fit for the applicant.

Several homelessness service providers have raised concern around what autonomy they will have to decline an allocation from the CIS once they complete their own thorough assessment. Service providers have also questioned what ramifications might there be for services who are allocated a client by the CIS and who decline accommodation after their own assessment has found the person to be unsuitable for the vacancy?

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<sup>4</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 16.

Issues such as what mechanisms will be in place for services to provide feedback to the CIS, particularly in relation to inappropriate referrals and allocations, have also been raised.

The Road Map acknowledges the CIS will only be successful with significant buy-in from the sector. The sector will only buy-in if the CIS has a collaborative approach to allocations and services are assured they can retain some autonomy around this process. Thorough procedures and MOUs will need to be developed to guide how allocation through the CIS occurs.

### **Recommendations**

- Thorough procedures and MOUs will need to be developed to guide relationships between the CIS and homelessness services, especially in regards to assessment and allocation.
- Ensure there are mechanisms for homelessness services to offer feedback to the CIS, particularly in relation to inappropriate referrals and allocations.

### **Who Should Provide the CIS?**

Through consultations with the homelessness sector the majority of services have indicated they would prefer the CIS be provided by a community organisation, preferably one with significant knowledge of the local homelessness sector. Additional feedback has been provided, noting the service needs to be adequately resourced with trained and skilled workers regardless of whether the provider is community or government based.

The Road Home<sup>5</sup> white paper acknowledges that specialist homelessness services are the experts in dealing with people experiencing homelessness. ACTCOSS commends the department for recognising the advantages of a community-based service provider running the CIS.<sup>6</sup> The risks identified can be mitigated if there is ongoing transparent communication with the homelessness sector and well established protocols and MOUs with homelessness service providers.

If the CIS is to play a role in prioritisation and allocation, it is especially important the homelessness sector can trust the CIS to have the appropriate expertise to conduct assessments and has a good understanding of each service and the nature of each vacancy. A number of representatives from the homelessness sector have indicated their trust in this area would be greater if the CIS was provided by a community organisation with experience in the specialist homelessness system than by a government service provider.

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<sup>5</sup> FAHCSIA (2008) *The Road Home: A National Approach to Reducing Homelessness*.

<sup>6</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 17.

As the Common Waiting List will be managed by Housing ACT ACTCOSS suggests it is important the CIS be provided by a community service organisation.

Additionally a CIS provided by a community service organisation might better meet the needs of the 19% of people entering homelessness who are exiting public housing.<sup>7</sup> These people who are currently in dispute with Housing ACT would be more likely to access a CIS provided by a community service organisation than one provided by a government service provider.

#### **Recommendation**

- That the CIS be provided by a community-based service provider with local knowledge and expertise.

## **Resources Required**

### **Funding**

ACTCOSS is particularly concerned no start-up funding has been provided to the CIS. There are always start up costs involved in any new initiative and we are concerned no additional funds have been made available.

ACTCOSS is also concerned about the minimal ongoing funding that has currently been allocated to this initiative. Unless the CIS is funded sufficiently it will not be able to achieve the outcomes hoped for and may in fact make it more difficult for people to access the system (eg. if the staffing levels are not sufficient to field the level of enquiries received). ACTCOSS acknowledges the Department has identified the need to acquire other funds; however organisations have asked if these funds will be taken from homelessness services as a transfer of workload and responsibilities is proposed. Any proposal for funding cuts to existing homelessness services needs to consider services are already stretched well beyond their resourced capacity.

### **Staffing**

The Road Map indicates the CIS is hoped to become the preferred and primary pathway into the system. As a result DHCS needs to fund it to a level which ensures people can access it on first attempt. Past experience of homelessness intake lines in this region would indicate a staff team much larger than a couple of workers would be required. Consultation feedback posits the Anglicare Housing Program intake service (a team of two staff), has been difficult to access and needs to rely on answering machine service to manage the number of calls coming in. This is especially difficult for people who may be in crisis requiring urgent assistance or who are transient and have no number they can leave for a return call. As the CIS is supposed to make the homelessness system more accessible and improve timeframes for assistance and pathways through the service system and out of

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<sup>7</sup> DHCS Staff at Joint Pathways 22 December 2009

homelessness,<sup>8</sup> it would be unacceptable for such situation to be anything but a rare occurrence. A way to prevent this is to fund the CIS sufficiently to maintain appropriate staffing levels.

Homelessness services have raised concern around what training the staff of the CIS will have, especially given the list of roles outlined on page 16 of the Road Map. Buy-in from the sector is more likely if the sector trusts the staff have appropriate expertise in assessments and prioritisation. Service providers have indicated they would have greater confidence in the CIS if the staff already have experience of the homelessness sector. Sector representatives have also commented that the CIS staff will need to have appropriate training in many areas, specifically in relation to Aboriginal and Torres Strait Islander issues to ensure culturally appropriate service delivery, and training in areas such as domestic violence.

Sector representatives have recommended the CIS staff team include Aboriginal workers. Having Aboriginal and Torres Strait Islander staff may lead to more Aboriginal and Torres Strait Islander people accessing the CIS who may otherwise have hesitations in accessing mainstream services.

#### **Recommendations**

- Fund the CIS to have the capacity to maintain appropriate staffing levels.
- Ensure that the CIS staff receive appropriate experience and training, including in cultural awareness and domestic violence.
- Recommend the CIS employ Aboriginal and Torres Strait Islander staff.

#### **Information Technology**

For a Central Intake Service to work effectively and more efficiently than the current system, a daily ring around and email about vacancies will not suffice as the information gathered will not be current enough. Real time data sharing about vacancies from all services captured by the CIS will be required.

Significant initial funding is needed to ensure all services have the appropriate IT capacity to implement such a system. Services will be required to upgrade not only new software but many services will require upgrades in IT hardware and internet capacity. Funding would also be required to provide training for staff of all services to become competent in the new system as well as to provide relief cover.

Funding such upgrades so all services have access to a reasonable IT capacity will make it easier to implement any new data collection that may be implemented by the CIS and in future by the new national homelessness

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<sup>8</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 15.

data collection system discussed as necessary in *The Road Home*<sup>9</sup> White Paper.

#### **Recommendation**

- Resource the implementation of a real-time vacancy list including the necessary IT upgrades for services and training for staff.

#### **Other Resourcing**

ACTCOSS supports the implementation of a 1800 free call number for the CIS in the ACT, as has been modelled by 'Opening Doors' in Victoria and the Anglicare Housing Program intake line in the ACT.

As the CIS is not currently proposed be a 24 hour service, some way of accessing 24 hour support and up to date information needs to be provided. The Victorian 'Opening Doors' model includes an after hours response.

Many homelessness service providers have indicated the CIS needs to have a brokerage component as there are often no vacancies available when people seek support and accommodation. The CIS will need some brokerage funds to assist alternative solutions for people in crisis.

#### **Recommendations**

- Implement a state-wide free-call number for the CIS.
- Ensure there is 24 hour support and information available to people trying to access the homelessness sector when the CIS is closed.
- Resource the CIS to provide brokerage to people in crisis where there are no vacancies available.

## **Implementation Issues**

### **Protocols**

If the CIS is hoped to be operational from 1 July 2010, MOUs with all related services and other key implementation protocols need to be developed as soon as possible. In Queensland MOUs are in place between the intake service and only some of the homelessness service providers, this has been criticised, seen as flawed. The CIS will need to develop MOUs with all the services involved and protocols need to be put in place that present clarity for all stakeholders.

People accessing the CIS need to be well informed about how their information will be recorded, who it may be passed on to, how long it will be kept and what else might be done with it (eg. data collection). Further clarity is required and protocols will need to be developed about how these and other confidentiality issues will be addressed.

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<sup>9</sup> FAHCSIA (2008) *The Road Home: A National Approach to Reducing Homelessness*.

### **Recommendation**

- Develop MOUs and protocols for the CIS and relevant homelessness services prior to the start-up of the CIS.

### **Timing and Review**

ACTCOSS has received recurring feedback from the homelessness sector expressing serious concern about the short timelines set for the roll out of this initiative. As the CIS will be servicing some of the most vulnerable people in our community, we need to take the time to ensure it is not made more difficult for people trying to access housing and support. Taking time to implement programs in an informed manner can ensure a more effective response in the long term.

ACTCOSS recommends a phase in period and a six month trial followed by a thorough review process with the capacity to re-scope if needed.

We commend the Department for committing to the project oversight group (Joint Pathways Working Group) remaining in place and meeting throughout the development stages of the project.<sup>10</sup> This group will need to continue to consist of representatives from the ACT Government and the homelessness sector. The group will need to ensure ongoing communication with the homelessness sector and additionally provide the sector feedback opportunities.

### **Recommendation**

- Apply a phase in period to the CIS and a thorough review after 6 months.
- Continue the oversight of this process through Joint Pathways.

### **Further Questions**

How will non funded services fit in to the CIS?

Organisations have enquired how long the CIS is supposed to try and obtain accommodation for a particular enquiry if there is no current vacancy?

How will the CIS relate to the no exit into homelessness strategy? How will it pick up on people exiting from AMC, Bimbiri, PSU and hospitals?

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<sup>10</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 18.

## Chapter 3 – Common Waiting List

ACTCOSS welcomes the implementation of a Common Waiting List (CWL) and shares the hope it will be easier for many individuals to apply only once for a range of social housing options and having only one application to maintain if their circumstances change. Through the CWL people may gain access to a broader range of options than they might otherwise, however there are some concerns and questions we would like to raise at this time.

The Queensland Shelter response to the implementation of the 'One Social Housing System' (OSHS) in Queensland,<sup>11</sup> contains many recommendations which can assist with informing the implementation of the CWL in the ACT with the hope the ACT can avoid some of the difficulties experienced in the Queensland case.

### Accessibility

ACTCOSS is concerned the Common Waiting List, managed by Housing ACT, will become the only way applicants can access community housing. This will limit accessibility to all social housing options for people who are not comfortable dealing with Housing ACT. This discomfort may be for a variety of reasons. Some vulnerable people, including Aboriginal and Torres Strait Islanders, have indicated a reluctance to deal with government bodies. As a result this may limit their ability to access any community housing services as they are unwilling to interact with Housing ACT.

Consideration must also be given to people who may have been a tenant of Housing ACT in the past and whose tenancy has not ended well, for example leaving a large debt or being evicted. Previously such people have been able to move on and seek assistance from community housing providers, whereas now they may not feel they have this option as they will need to apply through the CWL which will be managed by Housing ACT.

Similar accessibility issues were experienced in Queensland and Queensland Shelter recommended there be follow through on the state government's stated plan to create non-government entry points to the OSHS.<sup>12</sup>

Another issue of accessibility is where applications can be lodged for the CWL. It must be ensured applications can not solely be received and assessed (ie. if an interview is necessary) at the Belconnen Central Access Point as this location is not accessible enough for a large number of people applying for the CWL. ACTCOSS recommends multiple places where

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<sup>11</sup> Queensland Shelter Proposed Policy Position, Draft (20 Feb 2009) *One Social Housing System*.

<sup>12</sup> Ibid, Page 3.

applications can be lodged and assessed such as at Community Housing Providers and other sites around the ACT.

#### **Recommendation**

- Allow some flexibility for people to access community housing via other means if they are unwilling to access a Common Waiting List managed by Housing ACT.
- Provide multiple access points for lodging applications to the Common Waiting List.

### **Application Process**

The Common Waiting List is proposed as a more accessible option as applicants only have to apply once for a range of social housing options. However, accessibility is determined not only by the number of applications required but also the ease with which those applications can be made. The efficiency the CWL is hoping to create for applicants, support agencies and office staff will be undermined if the new application process is complex and time consuming.

The application form for the Common Waiting List needs to be carefully developed in consultation with all stakeholders – including members of the community who may potentially have need to complete the form. Some 32% of Canberrans have insufficient literacy skills to cope with modern day to day activities, and hence struggle with complex forms.<sup>13</sup> The current application form and other evidence required to apply for Public Housing is onerous. When adapting this to capture additional information required to assess eligibility for community housing it needs to be ensured this process does not become even more complex as the new system is implemented. Simplification needs to be considered where possible.

The Queensland experience of the OSHS is that the application process can be a significant administrative burden for clients. If applicants do not have the personal resources to navigate such an application (or an advocate to assist them) they can find the process extremely difficult. Support services in Queensland reported assisting applicants has been a huge advocacy burden. Queensland Shelter recommended the application form and documentation requirements be simplified, and recommended that either community agencies be resourced to assist applicants or more onus should be placed on department officers to actively support applicants to complete applications.<sup>14</sup>

In order to reduce confusion a thorough information campaign about the new process will be required, targeting providers, consumers and support services.

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<sup>13</sup> ACTCOSS (Feb 2009) *On the Same Page – Towards Partnerships for Adult Literacy in the ACT*.

<sup>14</sup> Queensland Shelter Proposed Policy Position, Draft (20 Feb 2009) *One Social Housing System*, Page 2,3.

**Recommendation**

- Ensure that the new application process is as simple as possible for applicants and support providers.
- Provide appropriate support with the application process to people with low literacy levels.

**Merging Current Waiting Lists**

Concern has been expressed about the requirement for existing applicants needing to reapply to be placed on the CWL. This could be a confusing and significant undertaking for many people who may have already had to access support to apply for placement on the existing lists. The implementation of the OSHS in Queensland has shown that major new processes, such as the need for existing applicants to reapply, need to be resourced appropriately to avoid overloading staff and causing problems for tenants and applicants.<sup>15</sup> How will individuals who need to re-apply be resourced and supported? Will there be HACT staff to support people with the application process, will support services be appropriately resourced to support applicants through this process for the second time?

As has been stated in The Road Map<sup>16</sup> it will be important to get the merging process of the existing lists right as it will be hugely confusing for applicants and tenants if this is not done well. Concerns applicants may be 'losing their place in the queue' will need to be managed well. All applicants will need to be offered the right to appeal any decision made concerning their application, and should be well informed of this process.

**Recommendation**

- Provide support to existing applicants who may need to re-apply to be placed on the CWL.
- Ensure existing applicants are communicated with effectively about the process involved in merging the current lists.

**Allocations**

Through consultations similar questions were raised regarding the CWL as had been raised for the CIS. Who decides who is 'most suited' to a vacancy, or what vacancy is 'appropriate' for what applicant? This will need to be a collaborative process between Housing ACT and other social housing providers.

In Queensland, participants frequently reported mismatches in allocations to community housing properties, where applicants who were inappropriate for

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<sup>15</sup> Queensland Shelter Proposed Policy Position, Draft (20 Feb 2009) *One Social Housing System*, Page 13.

<sup>16</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 24.

a particular property were referred to community housing providers.<sup>17</sup> Thorough assessment criteria and other requirements need to be worked through collaboratively and agreed upon by all stakeholders to minimise such occurrences. This needs to happen before the CWL is implemented.

Queensland Shelter recommended community housing providers be given direct access to the applicant database to speed up the referral process and prevent mismatches.

## **Disability**

ACTCOSS is particularly concerned about the proposed inclusion of disability group homes in the CWL.<sup>18</sup> Ensuring appropriate tenancy, access and support in disability group homes is complex and it is highly specialised work to assess applicants and suitable placements. The role of the CWL in supporting people with disabilities or disability workers to access group homes is unclear.

Transitions into disability group homes often happen over an extended period of time to ensure they are handled well and tenancies are successfully maintained. These placements are not something that can be allocated through a common waiting list.

### **Recommendation**

- That Disability Group Homes not be included in the Common Waiting List.

## **Implementation Issues**

### **Confidentiality**

As a vast range of information will be collected and held by the CWL and potentially accessed by a number of agencies, confidentiality is a key area for consideration. Thorough protocols will need to be developed with clear communication guidelines. All applicants of the CWL need to be well informed about how their information will be recorded, who has access to that information and at what stage of the process, how long their information will be kept and what else might be done with it.

As the CWL is to be run by a Government service provider, some applicants may need to be assured the information provided in their application will not be made available to other Government departments without their consent.

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<sup>17</sup> Queensland Shelter Proposed Policy Position, Draft (20 Feb 2009) *One Social Housing System*, Page 8.

<sup>18</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services*, page 22.

## Timing and Review

As with the CIS, ACTCOSS has received recurring feedback from the homelessness sector expressing serious concern about the short timelines set for the roll out of this initiative. The implementation of the CWL needs not be rushed. As with the CIS, the CWL will be servicing some of the most vulnerable people in our community. Time is needed to ensure nothing makes it harder for those trying to access housing and support. Taking time to implement projects properly can ensure a more effective response in the long term.

The confusion experienced with the introduction of the OSHS in Queensland, and the significant support existing applicants needed if they had to complete an new application (Queensland Shelter indicated this was a massive undertaking), indicate it would be preferable not to rush into implementation but rather take the necessary time to effectively communicate with all stakeholders, and to support existing applicants if they are required to re-apply.

### Recommendations

- Apply a 12 month trial period to the implementation of the Common Waiting List followed by a formal evaluation.
- Ensure ongoing meetings between Housing ACT and Community Housing Providers are maintained to discuss the implementation and operation of the CWL.

## Further Questions

Greater clarity is needed as to what relationship, if any, affordable housing providers such as Community Housing Canberra and Blue CHP will have with the CWL.

How will the CWL relate to the no exit into homelessness strategy? How will it pick up on people exiting from AMC, Bimbiri, PSU and hospitals?

There have been many questions raised about how the CWL will work when applied to shared accommodation placements. Detailed MOUs and protocols will need to be worked out with Community Housing Providers prior to the implementation of the CWL to ensure the right mix of tenants is maintained in shared placements.

Some homelessness services have asked whose role it will be to follow up and keep in contact with applicants of the CWL as they await allocation. Homeless people can be difficult to contact as they may be forced to move around frequently.

## Chapter 5 – Street to Home

Noting the tender process is currently underway there is limited scope to provide feedback on this initiative, through this mechanism.

However, ACTCOSS is concerned about the lack of start-up funding for this initiative. There are always start up costs involved in any new initiative and there is concern no additional funds have been provided to support the establishment of the service

Additionally ACTCOSS is interested in the consultation process. At the June 2009 Homelessness Round Table it was noted "the consultation would include input from homeless people if possible..."<sup>19</sup> Has there been consultation with homeless people regarding the street to home initiative and if so what form did it take?

As noted in the general comments of this submission, additional information on how Street to Home will relate to the Central Intake Service and the Common Waiting List would be welcome. Information has yet been provided about how these initiatives will inter-relate.

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<sup>19</sup> DHCS (Nov 2009) *The Road Map: A discussion paper on the way forward for ACT homelessness services and related services, Appendix: Notes from the Homelessness Round Table Meeting held 10 June 2009*, page 47.