

**Safe Places Emergency
Accommodation Program
(Inclusion Round)**

Program Design Discussion Paper

Acknowledgement of Country

In the spirit of reconciliation, the Department of Social Services acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

Help and Support

Violence against women and children can be hard to discuss and reading this document may cause distress.

Help is available. If you or someone you know is experiencing or at risk of experiencing domestic, family or sexual violence, call 1800RESPECT on 1800 737 732 or visit [1800RESPECT.org.au](https://www.1800RESPECT.org.au).

If you or someone close to you is in distress or immediate danger, please call 000.

1. Introduction

Family and domestic violence (FDV) is one of the leading causes of homelessness for women and children. The Safe Places Emergency Accommodation Program (Inclusion Round) will fund up to 720 new safe places to assist victim-survivors (including children) leaving FDV. The Inclusion Round will focus on improving access to appropriate emergency accommodation for First Nations women and children, women and children from culturally and linguistically diverse (CALD) backgrounds, and women and children with disability.

The Inclusion Round is part of the *National Plan to End Violence against Women and Children 2022-2032* (National Plan), with an allocation of \$100 million over 5 years (2022-23 to 2026-27). The Inclusion Round builds on the initial investment of \$72.6 million in the Safe Places Emergency Accommodation (Safe Places) program.

To inform the Inclusion Round grant design and ensure the program delivers expected outcomes, this discussion paper outlines the proposed approach to the grant opportunity. The Department of Social Services (the department) welcomes feedback in relation to the questions raised in the paper and any other relevant issues identified by stakeholders or the public.

Your feedback will be part of broader consultation to help inform the design of the Inclusion Round. In addition to this discussion paper, consultation activities will include:

- Jurisdictional workshops with key stakeholders and subject matter experts
- Engagement with specialist sector stakeholders focused on ensuring the program design supports First Nations women and children, women and children from CALD backgrounds, and women and children with disability
- Dedicated engagement with victim-survivors who have lived experience of emergency accommodation services.

Dedicated engagement with victim-survivors who have lived experience of emergency accommodation services aligns with the cross-cutting principle of the *National Plan to End Violence against Women and Children 2022-32* (National Plan) to centre victim-survivors. The National Plan commits to working with victim survivors and recognises the value of lived

experience in informing appropriate and effective initiatives. This engagement activity will be conducted by an external researcher with expertise in trauma-informed, culturally-safe and accessible practice. If you are a victim-survivor of family, domestic and sexual violence with lived experience of emergency accommodation and are interested in participating in this engagement activity in April or May 2023, please contact the Director of the Cultural & Indigenous Research Centre (CIRCA): Lena Etuk, 02 8585 1330, lena@circaresearch.com.au.

1.1. Privacy / Making a submission to the discussion paper

If you make a submission, you will be asked to provide information, including personal information. It is your choice what personal information you provide to us. You are not required to provide any personal information to make a submission.

When lodging a submission, the department will ask permission for your submission to be made publicly available, including on the department's website (www.dss.gov.au). Submissions will not be published without your agreement.

Even if your submission is published, the department's intention is that you are not identified as far as is possible. To this end, the department will endeavour to de-identify your information, so you cannot be identified. However, this may not always be possible due to various factors (e.g. if you include information in free text boxes that might identify you or because of the nature of your answers to the questions asked).

The department will handle all personal information in submissions in accordance with the Privacy Act. Details of how the department will do this are set out in the [Privacy Notice](#).

Submissions and comments will also be subject to freedom of information provisions and may be disclosed in that context, or where required by law, or for the purpose of parliamentary processes.

Questions raised in this Discussion Paper are intended as a guide only and other relevant material and views are welcome.

The closing date for receiving submissions is 10 March 2023. More information about how to lodge a submission and how feedback will be used is at the end of this document and on DSS Engage (engage.dss.gov.au).

2. Background

Significant unmet demand for emergency accommodation remains across Australia for women and children leaving FDV. The Australian Institute of Health and Welfare (AIHW) Specialist Homelessness Services data estimates the number of people a year impacted by FDV unable to access emergency accommodation due to the shortage in supply remains high, with 10,897 clients turned away from emergency accommodation in 2021-22.¹

¹ This refers to clients that did not have their need for emergency accommodation provided or referred by an SHS in 2021-22. Australian Institute of Health and Welfare (AIHW), [Specialist homelessness services annual report 2021-22](#), see Clients who have experienced family and domestic violence; Figure FDV.3: Clients who experienced family or domestic violence, by services needed and provided, 2021–22.

The National Plan Stakeholder Consultation Final Report² identified that existing emergency accommodation is not always appropriate or accessible for particular cohorts, including:

- First Nations women highlighted the need for purpose built accommodation, including in remote and regional communities, so those experiencing violence were not forced to leave social and community networks which keep them safe
- limited accessible housing options for women and children with disability
- barriers to seeking and receiving help for CALD women and children due to a lack of specialised services, especially for those on temporary visas.

The Safe Places Emergency Accommodation Program (Safe Places) provides a capital investment to support the building, renovation or purchase of emergency accommodation to support women and children in circumstances where staying safely at home is not possible.

The objective of the Inclusion Round is to increase the number of new and appropriate emergency accommodation places for women and children leaving FDV and to increase accessibility for First Nations women and children, women and children from CALD backgrounds, and women and children with disability, including those who experience the intersection of racism, ableism and sexism.

The Safe Places program as a whole aims to fund projects with the greatest impact for those most urgently in need of support. This means emergency accommodation delivered under the Inclusion Round must be open to all women and children leaving FDV regardless of background, including First Nations women and children, women and children from CALD backgrounds, and women and children with disability.

Grants under the Inclusion Round are only for capital works – that is, the purchase, building or renovation of dwellings to deliver new emergency accommodation places.

Applicants are responsible for:

- funding FDV and other specialist wrap-around services for clients
- funding the ongoing maintenance of dwellings
- reporting on the use of the accommodation for the 15 year designated use period.

2.1. Additional support for women and children leaving family and domestic violence

The Government supports women and children leaving FDV through a number of mechanisms:

- Once completed, the 41 projects funded under the initial round of Safe Places will deliver approximately 780 safe places assisting up to 6,340 women and children per year.
- Under the National Housing and Homelessness Agreement, \$1.6 billion is provided to the states to deliver housing and homelessness services.
- Through the National Plan, governments have committed to expanding options for women and children leaving FDV to stay safely in their homes through the Keeping Women Safe in their Homes program.

² Monash Gender and Family Violence Prevention Centre, [National Plan Stakeholder Consultation Final Report](#), 2022.

- In the Women’s Safety Budget Statement (October Budget), the Government announced \$169.4 million for an additional 500 frontline service and community workers.

In addition to the Inclusion Round, the Australian Government is delivering a substantial housing reform agenda with a dedicated focus on women and children leaving FDV. For example, the Housing Australia Future Fund includes:

- \$10 billion to build 30,000 social and affordable housing properties in its first 5 years, including allocating 4,000 to women and children leaving FDV and older women on low incomes who are at risk of homelessness
- \$100 million over 5 years for crisis and transitional housing options for women and children leaving FDV and older women on low incomes who are at risk of homelessness.

The Government is undertaking separate consultation with state and territory governments (‘state/s’), local government and key stakeholders to help design and implement these housing commitments. Consultations on the Inclusion Round will complement this work and help inform Government decision-making on future investments.

3. Program funding

The \$100 million commitment to the Inclusion Round is part of the Government’s investment of \$1.7 billion over 5 years to support the delivery of the next National Plan with a strong focus on prevention, early intervention and supporting victim-survivors to recover and heal.

To maximise the benefits from the \$100 million commitment, Inclusion Round grants will be made on a competitive basis. Preference will be given to applications that demonstrate value for money for the Commonwealth, including:

- where the proposal enables access for First Nations women and children, women and children from a CALD background and women and children with disability through dwelling design or other specialised support
- in locations with high unmet demand for emergency accommodation, including for other cohorts of women and children leaving FDV
- with high levels of co-investment.

Co-investment for the capital works component is strongly encouraged and evidence of capacity to deliver ongoing maintenance and FDV specialist services is required. Funding sources (for both capital works and ongoing services) may include private or charitable contributions, the organisation’s own resources, or state, local or other Commonwealth government sources (for example, National Housing Finance and Investment Corporation (NHFIC) financing).

3.1. Funding approach

The Government has identified the need for more flexible funding approaches for FDV accommodation, based on the differing needs, costs and cohorts of local communities. Under the Inclusion Round, the Government is considering providing grant funding of generally between \$500,000 and \$8 million per project.

Grant funding under the Inclusion Round may allow for:

- small-scale projects, for example emergency accommodation only proposals

- mixed-use proposals where emergency accommodation is combined with longer-term social or community housing which is funded or financed by states, NHFIC or third parties (e.g. non-government organisations, philanthropic and private sectors)
 - grant funding would be available to support the delivery of emergency accommodation and a proportionate contribution to shared amenities only.

This approach aligns with National Plan Response Pillar focus area 3, which encourages enhanced linkages between emergency accommodation, transitional housing and long-term housing to support women and children leaving FDV through the continuum of housing needs through to the recovery stage.

The Inclusion Round grant funding will be released by milestones, with payments made on completion of key project milestones. The following milestone structure is proposed as a standard approach:

- Signing of a Grant Agreement – 20% initial payment
- Base and Frame – 50% payment
- Lock-up – 20% payment
- Occupancy Permit and confirmation of FDV wrap-around service access for clients – final 10% payment

The Government is open to tailored funding agreements where projects require more flexibility.

3.1.1. Development Periods

The Government recognises some organisations have viable proposals but may require additional time to develop a high-quality and competitive proposal.

Subject to funding availability, i.e. should there be funding remaining after fully developed grant proposals are assessed, organisations may be awarded additional time to finalise their proposal to be competitive for a full grant through a Development Period of up to 6 months. This would provide additional time for organisations to obtain planning and development approvals and aims to mitigate implementation risks for delivery timeframes and budgets.

If awarded, Development Period recipients would be invited to apply for a full grant under a targeted competitive capital grant opportunity where their proposal would be assessed as suitable or not suitable.

Any Development Period recipients would not be guaranteed full grant funding to deliver their proposal, prior to their full grant being assessed.

Questions:

- 1. Are the proposed funding amounts of between \$500,000 and \$8 million per project appropriate for Inclusion Round grants?**
- 2. Should applications for mixed-use type proposals secure funding (e.g. loans, state funding, philanthropy) for the long-term housing aspects of their proposal prior to seeking Inclusion Round funding?**
- 3. Is the proposed milestone schedule the best model for delivering capital grants under the Inclusion Round?**

4. Will Development Periods encourage community-based FDV service organisations to apply for funding?

a. Is 6 months an appropriate timeframe for the Development Period?

5. Are there other ways to support applicants to develop high quality proposals?

4. Eligibility and assessment process

The department will assess proposals against eligibility and selection criteria. A Selection Advisory Panel will provide the decision maker (the Minister) with recommendations on the merits of each proposal. Applications assessed as suitable for funding and approved by the Minister will be offered a funding agreement with the department.

The assessment of proposals will be undertaken with regard to local construction and real estate costs, dwelling types, and building design that meets the needs of specific cohorts.

4.1. Potential eligibility criteria

Potential eligibility criteria for the Inclusion Round may include the following:

- Eligible entity types
 - Company
 - Cooperative
 - Corporate State or Territory Entity
 - Incorporated Association
 - Indigenous Corporation
 - Local Government
 - Statutory Entity
- Ineligible entities include:
 - an organisation, or your project partner is an organisation, included on the National Redress Scheme's website on the list of 'Institutions that have not joined or signified their intent to join the Scheme' (www.nationalredress.gov.au).
 - an organisation, or your project partner is an organisation, included on the Workplace Gender Equality Agency non-compliant organisations list (www.wgea.gov.au).
- Proposal provides new (additional) safe places for FDV emergency accommodation, with a "safe place" as defined in section 4.3.2.
- The applicant or partnering services provider is a suitable FDV specialist services provider capable of delivering appropriate FDV specialist services in the state where the project is located.
 - Evidence of capability to deliver appropriate FDV specialist services may be required, such as support from the relevant state government or documentation demonstrating the specialist services provider's service delivery model is consistent with the standards and requirements in the relevant state.
 - Where relevant, this would include evidence of specialist services providers' capability to support First Nations women and children, women and children from a CALD background and women and children with disability or other cohorts.
- Confirmation the applicant and partnering services providers will agree to reporting and evaluation requirements of the department.

- Confirmation of compliance with all relevant Australian Government, state, and local government regulations, including implementation and compliance with the *National Principles for Child Safe Organisations*. Compliance will need to be evidenced on an annual basis through the designated use period for successful grantees.

4.2. Potential assessment criteria

Consultation with specialist sector stakeholders will support the development of the assessment criteria to encourage applications that will deliver appropriate and accessible emergency accommodation for First Nations women and children, women and children from CALD backgrounds, and women and children with disability.

This engagement will invite expert views on embedding accessibility, cultural safety and appropriateness across the assessment criteria, including the information applicants should be required to provide to demonstrate how the location, design features, services and amenities of the proposed emergency accommodation are accessible and appropriate.

4.2.1. Criterion 1: Demand and location

Applications will be assessed on the extent to which the build is in an appropriate location to meet emergency housing demand and provide access to services and amenities.

Evidence of emergency housing demand that may be considered includes:

- Areas identified with high unmet demand for emergency accommodation for women and children leaving FDV:
 - The Government will determine priority locations through consultation with the states and other stakeholders, and a quantitative analysis of unmet demand for emergency accommodation for women and children leaving FDV. The department will consult with AIHW and states to determine the best sources of data (for example, Specialist Homelessness Services data and priority housing waiting lists).
 - Priority locations will be published as part of the grant opportunity guidelines.
- Projects outside the priority locations may be considered where evidence of high unmet demand can be demonstrated.

This could include the applicant's own data on waiting lists and First Nations women and children, women and children from a CALD background and women and children with disability, supported in the location. Close proximity to the following infrastructure and services will be favourably considered:

- existing public transport networks
- other forms of established infrastructure including educational and leisure facilities
- daily needs and activity centres
- medical services
- services and amenities meeting the needs of First Nations women and children, women and children from CALD backgrounds and women and children with disability.

4.2.2. Criterion 2: Specialist services and appropriate support

Applications will be assessed on the extent to which they provide security, safety, privacy and dignity.

The criterion may consider:

- suitability of the provider of specialist services for women and children leaving FDV
- evidence the specialist services provided are client-centred, trauma informed, culturally appropriate, rights based, age and gender appropriate, and support victim-survivors so they can recover and heal
- evidence victim-survivors will have access to social, legal and government services to support them to heal and hold perpetrators to account
- evidence appropriate policies are in place, and can be enforced, to protect vulnerable people including children.
- evidence the emergency accommodation will provide privacy for individuals/family units consistent with the definitions of emergency accommodation and a 'safe place' (outlined in sections 4.3.1-2)
- evidence the emergency accommodation will provide high levels of physical security consistent with the needs of the client cohort
- any additional features that meet the needs of First Nations women and children, women and children from CALD backgrounds and women and children with disability.

4.2.3. Criterion 3: Value for Money

Applications will be assessed on the extent to which they represent value for money for the Commonwealth investment under 2 main elements: project cost and project quality.

The **project cost** criteria may consider:

- local construction/real estate costs to ensure high cost locations will not be disadvantaged in the assessment process
- costs associated with higher build quality, to ensure dwellings proposed to be built to gold or platinum Livable Housing Australia standard to accommodate women and children with disability will not be disadvantaged in the assessment process
- co-contributions from the applicant, private and philanthropic sources, state and/or local governments
- the cost to the Commonwealth per dwelling and per safe place delivered.

High quality applications may include supporting costing information including cost contingency and escalation, a quantity surveyor report, building quotes, and confirmation of secured funding sources.

The **project quality** criteria may consider the extent to which the application provides certainty that:

- the design of the dwelling/s is appropriate to the client cohort and location
- the emergency accommodation meets at least silver standard of the Livable Housing Australia design guidelines in the National Construction Code
 - projects that meet gold or platinum standards in order to accommodate women and children with disability will be considered favourably
- a technically compliant project will be delivered
- the project will be delivered on time and to budget
- construction risks have been adequately addressed.

High quality applications may include:

- plans, designs, number, size and configuration of the dwelling
- stage and evidence of approvals

- evidence of land ownership or intent to acquire land
- if land is leased, evidence of approval to build and who will own the asset post-build.

4.2.4. Criterion 4: Capacity and capability

The extent to which the applicant demonstrates capacity and capability to deliver the accommodation and provide support for clients using the dwellings.

High quality applications may include:

- The funded organisation's 2021-22 financials and strategic plan
- Evidence of experience delivering similar projects or a partnership with an organisation involved in the construction to manage the relationship with the builder and ensure the project is delivered to budget, and meets all timeframes, approvals and quality standards
- Evidence of financial commitments/resources to fund:
 - ongoing FDV specialist services and where relevant, other specialist support services for First Nations women and children, women and children from a CALD background and women and children with disability
 - ongoing maintenance over the 15 year designated use period
- Tenancy management and length of stay policies
- Confirmation women and children leaving FDV are not turned away on a basis other than a lack of availability.

A financial viability check may be undertaken on suitable applicants (or the project builder).

4.3. Proposed definitions

4.3.1. Proposed definition of 'emergency accommodation'

For the purposes of the Inclusion Round, 'emergency accommodation' is defined as short-term accommodation for less than 12 months and includes:

- refuges
- crisis shelters.

This definition incorporates emergency accommodation options (excluding hotels and boarding houses) as described by the AIHW.³

Recognising client diversity and different models of emergency accommodation across jurisdictions, longer stays may also be considered where supporting evidence for a custom approach is provided.

A key requirement of Safe Places accommodation is that providers ensure women and children leaving FDV are not turned away on a basis other than a lack of availability.

4.3.2. Proposed definition of a 'safe place'

Dwellings eligible for funding under the Inclusion Round must provide security, privacy and dignity and include a self-contained living space including bedroom/s, bathroom, kitchen/kitchenette, and laundry, for the sole use of one person or family group.

- The number of 'safe places' (i.e. the maximum number of women/children supported at any one time) will be calculated on the basis that there are 2 persons per bedroom.

³ AIHW, [Specialist homelessness services annual report 2021-22](#), see Technical notes; Glossary.

For example, a 2-bedroom house accommodating one family unit will equal 4 safe places.

This definition is consistent with the measure of overcrowding accepted by the AIHW,⁴ noting there may be individual circumstances where it is appropriate for the emergency accommodation to be provided in a way that does not meet the AIHW definition.⁵

This definition will apply to all proposals to ensure consistency in the assessment process.

The cost to the Commonwealth will be measured on a per dwelling and per safe place basis.

Note: Dormitory-style accommodation is not eligible under the Inclusion Round, as it does not provide the appropriate level of privacy or dignity for victim-survivors of FDV who may be experiencing significant trauma.

4.3.3. Proposed definition of a 'specialist service'

It is important accommodation delivered under the Inclusion Round provides access to appropriate and specialist support for women and children leaving FDV.

Services should be rights-based, client-centred, trauma-informed, culturally appropriate and accessible, age appropriate and have gender expertise. Services must demonstrate expertise and an understanding of FDV, and place the safety, needs and interests of women and children at the centre of all decisions.

Questions:

- 6. Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?**
- 7. Are there additional criteria that should be considered?**
- 8. What are the best measures to determine an applicant's suitability to meet the needs of First Nations women and children?**
- 9. What are the best measures to determine an applicant's suitability to meet the needs of women and children from CALD backgrounds?**
- 10. What are the best measures to determine an applicant's suitability to meet the needs of women and children with disability?**
- 11. What standard of the Livable Housing Australia design guidelines should emergency accommodation for First Nations women and children, women and children from a CALD background and women and children with disability meet?**
- 12. Is the proposed designated use period of 15 years appropriate?**
- 13. What is the best measure for determining an applicant's ability to support clients using the emergency accommodation over the designated use period?**
- 14. Are the definitions for 'emergency accommodation', a 'safe place', and a 'specialist service' appropriate?**

⁴ [Canadian National Occupancy Standard \(aihw.gov.au\)](http://aihw.gov.au)

⁵ This includes the more detailed parameters for overcrowding relating to the age and gender of children for permanent housing.

a. Should the definition of ‘emergency accommodation’ include longer stays?

15. Are there alternative accommodation options that should be considered as eligible or not eligible for Inclusion Round funding?

5. Grant round

The Inclusion Round will be an open and competitive capital grant round published on [GrantConnect \(www.grants.gov.au\)](http://www.grants.gov.au). The grant round is expected to open in mid 2023 for a period of 2 months.

5.1. Support for applicants

Prior to opening the round, the department will publish a Forecast Opportunity on GrantConnect advertising the estimated opening date. Potential applicants are encouraged to register on GrantConnect to receive notifications of the upcoming grant opportunity.

To assist applicants in developing high quality proposals, the department will publish an application pack on GrantConnect. This will include the grant opportunity guidelines, an applicant guide, a checklist of mandatory and desirable documents for assessment purposes and templates. The checklist will provide applicants with guidance on the elements involved in capital works projects, including cost contingency and escalation calculations.

The department will also hold information sessions ahead of the grant opportunity opening to increase potential applicants’ understanding of the requirements of preparing a grant proposal.

Questions:

16. What advice/templates/checklist items would assist applicants in developing quality proposals?

6. Next steps

6.1. Preparing submissions

Stakeholders wishing to have their views considered by the Government on possible design and selection approaches to deliver the Inclusion Round are invited to provide a submission to the department. You will be asked if you wish to provide personal information, such name and background, and the organisation you represent (if applicable). This information is not mandatory.

This discussion paper is complemented by engagement with stakeholders across the country.

6.2. Lodging submissions

Submissions can be provided online via DSS Engage. You will be asked to specify whether you would like your submission to be made publicly available, including on the department's website (www.dss.gov.au). Submissions will not be published without your agreement.

Alternatively, you may send us a written submission via post:

Housing and Homelessness Program Delivery Branch
GPO Box 9820
Department of Social Services
Canberra ACT 2601

If you send your submission via post, please consider postal delivery times and specify whether you would like your submission to be published online.

The closing date for receiving submissions is 11:59pm, 10 March 2023.

If you have any further questions about this paper, please contact us at SafePlaces@dss.gov.au.