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**Discussion Paper Submission to Department of Social Services**

# **Safe Places Emergency Accommodation Program**

*Safe Places Inclusion Round*

*Submission made by*

The Bayside Peninsula Integrated Family Violence Partnership (Victoria)

The Southern Melbourne Integrated Family Violence Partnership (Victoria)

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## Executive Summary

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*"It's so much more than just a building" (Workshop participant)*

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The Bayside Peninsula Integrated Family Violence Partnership ('BPIFVP') and the Southern Melbourne Integrated Family Violence Partnership ('SMIFVP') are pleased to provide feedback to the Program Design Discussion Paper on the Safe Places Emergency Accommodation Program Inclusion Round ('the Discussion Paper').

Our submission to the Discussion Paper is a significant milestone for the newly established Emergency Accommodation & Housing Working Groups across the BPIFVP & the SMIFVP. It also forms a key advocacy action for the BPIFVP & SMIFVP Local Motel Coordination Projects funded by Family Safety Victoria.

Emergency accommodation for women and children leaving family violence is "so much more than just a building." We are strongly supportive of the Federal Government's initiative to invest in building more emergency accommodation, as we know how crucial inclusive, safe and accessible emergency accommodation is in supporting women and children to begin their journey of recovering and healing from family violence.

In this submission, we provide feedback that could make the proposed approach to funding purpose-built inclusive emergency accommodation even more inclusive, accessible and sustainable. To summarise our key feedback:

- We propose a two-tier application process involving an Expression of Interest followed by dedicated funding and a longer development period to meaningfully enable community family violence organisations to develop a high-quality proposal.
- We suggest more than \$8 million per successful project may be required to realistically build high-quality inclusive emergency accommodation. We also suggest that the proposed milestone structure to payments be more weighted to the commencement of the process.
- We propose an additional assessment criterion requiring applicants under the Inclusion Round to demonstrate timely and appropriate consultation and partnership with Aboriginal Community Controlled Organisations, as well as other specialist organisations working with diverse community cohorts.
- We emphasise the imperative of funding family violence and other community services to increase their capacity to meet the increased need associated with building new emergency accommodation. To ensure the success of any emergency accommodation built under the Program, the Federal Government needs to be in conversation with State Governments to ensure additional funding is provided for growth in capacity, ongoing service delivery and maintenance.
- We would like to see the lens of 'diverse communities' widened to include LGBTIQ+ people leaving family violence, who face real barriers accessing emergency accommodation, and a shift in the binary gendered language of policy and funding documents so that the LGBTIQ+ community is not left behind.

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- We recommend policy and associated eligibility criteria allows for the inclusion of women and children on temporary visas, a cohort who face considerable barriers when escaping family violence due to their visa status.
  - We suggest measures to assess applicants' ability to meet the needs of First Nations women and children, CALD women and children and women and children with disability. We also bring attention to the specific needs of older people and young people experiencing family violence.
  - We recommend greater flexibility in the definition of 'safe place' to enable responsive operational decisions that support the agency and needs of women and children from First Nations and CALD communities in particular, allowing scope for kinship care arrangements and larger families.

This submission brings together contributions from a network of organisations who are members of the BPFIVP and the SMIFVP, and/or participate in the Emergency Accommodation & Housing Working Groups within both of the BPIFVP and the SMIFVP ('the network'), including:

City of Greater Dandenong  
Department of Families, Fairness & Housing  
Good Shepherd  
Launch Housing  
Peninsula Health  
St Kilda Crisis Centre  
The Orange Door  
The Salvation Army  
Thorne Harbour Health  
Uniting Vic/Tas  
Wayss  
Wellsprings for Women  
Wintringham

The submission is further endorsed by:

Family Life  
Southern Homelessness Services Network

For all questions or for further information, please contact:

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## Submitting Parties

This is a joint submission endorsed by the Chair of both the Bayside Peninsula Integrated Family Violence Partnership (BPIFVP) and the Southern Melbourne Integrated Family Violence Partnership (SMIFVP). The Chairs of both partnerships wish to thank all members of the respective partnerships for their contribution to this submission, and for the ongoing, collaborative work across partnership members and agencies.

The BPIFVP and SMIFVP are both funded by Family Safety Victoria, covering the Victorian State Government Areas of Bayside Peninsula and Southern Melbourne, respectively.

Both partnerships play a key strategic leadership role in developing a more effective family violence service system. They do this by strengthening system integration and supporting the implementation of the Victorian Government's family violence reforms. The BPIFVP and SMIFVP include members from government and non-government agencies, family violence services, children and family services, Victoria Police, justice and legal services, housing, mental health, alcohol and other drugs, community, and health services.



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**GET UP! STAND UP! SHOW UP!**  
3-10 JULY 2022

We acknowledge Aboriginal and Torres Strait Islanders are Australia's First Peoples and the traditional owners and custodians of the land on which we live and work.

Uniting is committed to safe and inclusive work places, policies and services of LGBTIQ+ communities and their families.

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## **Acknowledgements**

The Bayside Peninsula Integrated Family Violence Partnership and the Southern Melbourne Integrated Family Violence Partnership respectfully acknowledge the Traditional Owners of the lands on which we work, the Boonwurrung/Bunurong and Wurundjeri people of the Kulin Nation. We pay our respects to their Elders past and present.

The BPIFVP and SMIFVP acknowledge the strength and resilience of those who have experienced family and domestic violence, and the bravery of those who use their voices, experiences and advocacy to inform responses to family violence. We also honour those who are prevented from coming forward by the enormity of the trauma they suffered, and those whose voices can no longer be heard.

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# Inclusion Round Discussion Paper Questions

## Program Funding

### Funding Approach

#### **Q1: Are the proposed funding amounts of between \$500,000 and \$8 million per project appropriate for Inclusion Round grants?**

The network is of the view that the proposed funding amounts are insufficient. Even the proposed highest amount of funding to be allocated, \$8 million, is not enough to build a high-quality core and cluster style model of emergency accommodation.

Some insights from the experience of the network:

- Launch Housing noted that the recent build of Viv's Place<sup>1</sup> cost \$30 million for 60 apartments
- Feedback from across the community services sector identified multiple examples of construction experiencing significant increases in labour / building materials / construction / fit out costs. As an example, participants highlighted that kindergartens often cost around \$8 million to build and would not require the same degree of complexity around risk, safety, etc. as needed for emergency accommodation.
- There are many additional costs that also need to be factored in:
  - Play spaces and other child-centered and child-safe amenities and infrastructure
  - Costs for fit out and furniture
  - The impact to total cost due to inflation and current construction costs
  - Regional areas are expensive as the workforce often need come in and reside in the area, creating additional costs in addition to the build

The network therefore proposes the funding amounts on offer be increased.

### Mixed Used Proposals

#### **Q2 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?**

The network expresses support for mixed used proposals incorporating transitional and longer-term community housing alongside emergency accommodation. The group is supportive of providing 'step up step down' models of supported housing<sup>2</sup> and meaningful exit pathways for women and children in emergency accommodation.

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<sup>1</sup> Launch Housing's Viv's Place, an apartment building for at-risk women and children. Refer Premier of Victoria. May 2022. *Australian-First Housing For Family Violence Survivors*. <https://www.premier.vic.gov.au/australian-first-housing-family-violence-survivors>

<sup>2</sup> The Step Up Step Down model provides short-term sub-acute residential service (up to 28 days) with recovery focused support

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However, the proposal that applicants secure funding prior to seeking Inclusion Round funding is unrealistic within the proposed time frame and would require increased consultation time, as well as greater amounts of funding to properly address the complexity inherent in such applications.

## Milestone Payment Structure

### **Q3 Is the proposed milestone schedule the best model for delivering capital grants under the Inclusion Round?**

The network is of the view that the proposed milestone structure to payments needs to be weighted more towards the beginning of the process, to enable applicants to employ the right people for design, planning, consultation and construction.

A workshop participant involved in setting up a site for The Orange Door<sup>3</sup> noted that there are significant up-front costs which must be accommodated by early release of funding (greater than 20%). If not, there is an expectation that architects and designers will do work "in kind" which is not realistic.

## Development Periods

### **Q4 Will Development Periods encourage community based FDV service organisations to apply for funding? Is 6 months an appropriate timeframe for the Development Period?**

### **Q5 Are there other ways to support applicants to develop high quality proposals?**

The network is of the view that six months is not enough time for the Development Period.

Community-based family violence organisations are already stretched to capacity. Putting together a high-quality competitive application is a significant body of work. The current approach favours larger organisations that have the existing capacity to take on the resource-intensive application process. Engaging meaningfully with community, with the service sector and with architects and other specialists is beyond the current capacity of smaller family violence organisations who otherwise would be well placed to lead an application.

The network are of the view that 18 months would be a more realistic Development Period.

We would also like to see dedicated funding provided to community organisations to undertake the application process. We therefore propose a two-tier process:

1. Expression of Interest: Applicants can submit an EOI covering key criteria at a macro level
2. Detailed Application: Government funding is provided for a 12-month fixed-term role to lead the application process, if successful at the EOI stage.

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<sup>3</sup> Following the [Royal Commission into Family Violence](#) in 2015, Family Safety Victoria established The Orange Door support and safety hubs as the intake point in each Local Government Area for family violence, child and family wellbeing, community based child protection and people using violence. [www.theorangedoor.vic.gov.au](http://www.theorangedoor.vic.gov.au)



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## Eligibility and Assessment Process

### Proposed Eligibility and Assessment Criteria

***Q6 Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?***

***Q7 Are there additional criteria that should be considered?***

The network expresses broad support for the proposed eligibility and assessment criteria. In addition, we raise the following points.

#### **Meeting needs of diverse communities**

In assessing the extent to which a specialist service can provide security, safety, privacy and dignity for women and children leaving family violence (Criterion 2), the Discussion Paper states that consideration is to be given to “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.”

The needs of ‘diverse communities’ cannot be an addendum nor subsumed within a mainstream model. Mainstream services are not best placed to understand cultural safety and the diverse needs of First Nations women and children, nor any other ‘diverse community’ cohort. The network therefore proposes that meaningful engagement with specific community groups and their representative organisations should be uplifted to a Criterion of its own.

Any applicant should be able to demonstrate timely and appropriate consultation and partnership with a range of specialist community organisations, including Aboriginal Community Controlled Organisations (‘ACCOs’), CALD family violence organisations, organisations supporting women with disability, and LGBTIQ+ organisations.

#### **Determining high demand locations**

We would like to make sure that, when determining areas of ‘high unmet need’ for emergency accommodation, applicants demonstrate that they are communicating with State Government and local organisations providing direct support in the local area. In the current context, it is possible to argue that almost every single area is under immense housing pressure. We would like to ensure that the assessment process considers the nuances ‘on the ground’ and not just a Federal ‘birds’ eye’ view based on national statistics.

#### **Funding to increase service capacity**

While it is positive that the Federal government is committed to funding capital works investment for new emergency accommodation, we are concerned about the expectation placed on applicants to “magically” find funding for service delivery and ongoing upkeep.

The family violence system in every state and territory is already stretched beyond capacity. We are strongly of the view that the Federal Government needs to be in conversation with the relevant

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State Governments to ensure that additional support is provided to family violence organisations to enable ongoing service delivery.

Furthermore, the family violence system is not limited to specialist family violence organisations but also interfaces with housing, AOD, Child protection, Child and Family Services, mental health services and more. Building new emergency accommodation will inevitably create increased pressure and strain on all organisations involved in the delivery of services to women and children who reside in the accommodation.

Without additional funding for all services involved, simply adding new emergency accommodation infrastructure to the existing system will set the applicant up to fail, with far-reaching negative consequences for woman and children leaving family violence. This includes, for example, funding for outreach and additional services, as well as establishing options for exit pathways and linking with state housing options.

Conversations between Federal and State Governments and guarantees of increased funding for all services engaging in the provision of new emergency accommodation are critical to ensure its ongoing success.

### **Family violence frameworks and accommodation management experience**

We also propose an assessment criterion touching on why the applicant wants to take on this project, to ensure that applicants have a true passion to deliver best outcomes for these cohorts. What is their understanding of family violence? What are the values and belief systems that drive them to undertake this project? How does the applicant understand the systems and structures they are a part of?

We would also like to see well-rounded demonstration that an applicant has previously managed accommodation services (for example, refuges, motel, rooming house etc.). There are many important and ongoing requirements to support women and children living together in a high density environment at one of the most traumatic periods of their life, and we would like to ensure the applicant is passionate about this and has the requisite understanding, skills and experience.

Additionally, consideration should be given to joint applications that bring together organisations with complimentary areas of expertise across housing and family violence.

## **First Nations Women and Children**

### ***Q8 What are the best measures to determine an applicant's suitability to meet the needs of First Nations women and children?***

Suggested measures include:

- Evidence of meaningful engagement and co-design with First Nations community members
- Centering lived experience - employing First Nations workers and consulting with First Nations people who have experienced family violence

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- Demonstrated partnership with Aboriginal Community Controlled Organisations (ACCOs) and consultation on embedding cultural safety from the start
  - Whether the applicant has a Diversity Strategy in place
  - Dedicated allocation of a certain number of 'safe places' for First Nations and Torres Strait Islander women and children leaving family violence (e.g. at Viv's Place, this was 10%)
  - Demonstrated consideration on how to best support kinship care arrangements

It is also important that the application can demonstrate their commitment to an intersectional lens, including consideration for the needs of First Nations Elders, queer and trans First Nations people, and young mob.

## Women and Children from CALD Backgrounds

### **Q9 What are the best measures to determine an applicant's suitability to meet the needs of women and children from CALD backgrounds?**

The network stressed the importance of increasing access to emergency accommodation for CALD women on temporary visas. Many asylum seekers and refugees are currently unable to access refuges or emergency accommodation, due to the informal 'quota' systems in place in emergency accommodation, restricting the number of women on temporary visas because there are few exit options for them. We would like to see a commitment to ensuring that no woman or child leaving family violence is turned away based on their visa status. This may include cultural competency workplans to demonstrate how they will provide an equitable service to women on temporary visas.

In terms of demonstrating evidence of specialist services providers' capability to support women and children from a CALD background (p.7), we recommend direct consultation with InTouch<sup>4</sup>.

According to InTouch, the barriers for CALD women are not so much about infrastructure or specific locations but rather systemic barriers, plus gaps in staff confidence, knowledge, and resources to support CALD clients. CALD women often have large families with many children, so it is important the emergency accommodation is able to accommodate the whole family.

InTouch have best practice models for family violence emergency accommodation which could be utilised to determine an applicant's suitability to meet the needs of CALD women and children, including:

- Adaptability to the specific needs of women on temporary visas
- Culturally appropriate food and client autonomy in purchasing goods and services to meet their needs
- Connection to faith, including prayer spaces and connection to local religious institutions
- Connection to culture, including local community organisations, programs and groups

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<sup>4</sup> inTouch Multicultural Centre Against Family Violence is a Victorian state-wide agency working across the family violence continuum, providing culturally informed, in-language case management, perpetrator programs, a fully accredited community legal centre and specialised migration assistance, crisis recovery and sector capacity building initiatives. [www.intouch.org.au](http://www.intouch.org.au)

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- Accessibility of transport through public transport and taxis
  - Accessibility of available services (health, employment and job readiness, child and family, driving lessons, legal, immigration, financial)
  - Good communication through recruitment of a diverse workforce
  - Co-case management model implemented in partnership with InTouch and mainstream services

## Women and Children with Disability

**Q10 What are the best measures to determine an applicant's suitability to meet the needs of women and children with disability?**

**Q11 What standard of the Liveable Housing Australia design guidelines should emergency accommodation funded under the Inclusion Round meet?**

The network stated that there is an extreme lack of suitable options for people with a disability leaving family violence. We suggest that it is important to build all properties to the highest accessibility standard possible, while also dedicating additional funding to make minor alterations to properties to meet the needs of individual women and children with disabilities as required. It is also important to consider how someone's carer might be accommodated in the emergency accommodation. This may require adjusting the number of people per safe place.

Suggested measures include:

- Evidence of meaningful engagement and co-design with relevant community members and organisations
- Centering lived experience - employing workers with a disability and consulting with people with a disability who have experienced family violence

## Designated Use Period

**Q12 Is the proposed designated use period of 15 years appropriate?**

**Q13 What is the best measure for determining an applicant's ability to support clients using the emergency accommodation over the designated use period?**

While we support the construction and delivery of emergency accommodation that is intended to exist well into the future, we note that a lot can change over a fifteen year period: from the priorities of State governments and funding contracts, to the political landscape and risk appetite, to family violence service approaches, frameworks and methodologies.

We are cautious about tying applicants to a model that is potentially no longer achievable over the 15-year use period. There needs to be some degree of flexibility and adaptability built into the use period commitment. We also query who owns the building and is responsible for its ongoing maintenance after the designated use period has elapsed?

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The network would like to see greater clarity on the post-15 years expectations regarding the property, residents and services.

## **Definitions**

**Q14 Are the definitions for 'emergency accommodation', a 'safe place', and a 'specialist service' appropriate?**

**Q15 Are there alternative accommodation options that should be considered as eligible or not eligible for Inclusion Round funding?**

### **Emergency Accommodation**

It is the network's view that the definition of emergency accommodation should include stays longer than 12 months. In the absence of viable and accessible exit pathways for women and their children, many people may need to stay longer. For example, the size of families may present a barrier to suitable exit pathways, or for women on temporary visas, the time it takes for visas to be processed and to find suitable transitional or permanent accommodation.

### **'Safe Place'**

The network queries the proposed quota of two people per bedroom in the proposed definition of 'safe place'.

We support measures that ensure overcrowding is not allowed or normalised in emergency accommodation. However, we also query whether the proposed caps limit true accessibility and inclusivity. For example, it is common for CALD or First Nations women to have more than one child in their care.

We therefore suggest that the limit of two people per bedroom be a recommendation rather than a strict definitional criterion. This would allow greater flexibility to accommodate families of different sizes and needs. These decisions should be able to be made at an operational level in conversation with the client and with full respect for her agency and the needs of any children.

We also wonder whether the concept of 'dignity' and 'privacy' in accommodation utilised by the Discussion Paper is constructed through a "white lens" and could benefit from further consultation and input from CALD and First Nations communities and organisations in particular.

We also again raise the importance of incorporating child safety and children's needs into the build from the beginning.

### **Specialist Service**

We would like to see a proven ability to work well with all client cohorts, and clear track record of collaboration with other specialist services including ACCOs and LGBTIQ+ organisations.

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## Support for applicants

### **Q16 What advice/templates/checklist items would assist applicants in developing quality proposals?**

We reiterate our suggestion that the most important thing that could help support community organisations to develop a high-quality competitive proposal is a two-tier process:

1. Expression of Interest: Applicants can submit an EOI covering key criteria at a macro level
2. Detailed Application: Government funding is provided for a 12-month fixed-term role to lead the application process, if successful at the EOI stage

## Other feedback

### Other Communities

#### **LGBTIQ+**

There is no mention of LGBTIQ+ women or children, or trans and gender diverse people experiencing family violence in the Discussion Paper – despite the fact that we know that trans women, gay and bisexual men and other members of this population experiencing family violence find it especially hard to access appropriate emergency accommodation. Existing emergency accommodation options are often unsafe or inappropriate for this cohort, with many turned away.

We would like to see greater consideration to ensuring LGBTIQ+ people leaving family violence are not left behind in the Inclusion Round, including direct consultation with specialist LGBTIQ+ organisations such as Thorne Harbour Health<sup>5</sup> and LGBTIQ+ people with lived experience of family violence.

We also note that this is a broader systems issue requiring systemic change. For example, many family violence organisations are funded specifically to provide services to “women and children” in their contracts with government. This binary gendered language leaves behind so many victim survivors of all genders and sexualities. There is an urgent need for reform in the policy and funding space to ensure that the LGBTIQ+ community has equitable access to emergency accommodation and appropriately specialised support to heal and recover from family violence.

#### **Young people**

Young people aged 15-18 years who experience family violence often struggle to find appropriate emergency accommodation outside of youth residential facilities. In particular, young men are often turned away from support despite being a very vulnerable cohort. While it is beyond the scope of our submission, we would like to raise this as a matter for consideration. We also note that high numbers of First Nations children in state care may experience family violence while in foster

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<sup>5</sup> Thorne Harbour Health is an LGBTIQ+ community-controlled organisation, working with and for LGBTIA+ communities and people living with or affected by HIV. [www.thorneharbour.org](http://www.thorneharbour.org)

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or other care arrangements. It is very hard to find emergency accommodation for First Nations children and young people. We would like to see the Inclusion Round consider how young people experiencing family violence may be accommodated.

### **Older people**

Older people (60 years+, or 50 years+ if First Nations) experience family violence, inclusive of intimate partner violence, yet often face barriers to escaping violence due to a lack of suitable emergency accommodation. Whilst there is often an intersection between age and disability with older victim-survivors, their particular well-being and health needs should be recognised in the design and provision of emergency accommodation.

If there are to be allocated 'safe places' for older women experiencing family violence, there needs to be adjustment of age limits for First Nations Elders to ensure equitable access.

We would like to see the Inclusion Round consider how older people experiencing family violence may be accommodated.

### **Clients with complex mental health and AOD issues**

Many services in the network work with clients with high levels of health complexity who are unable to access conventional emergency accommodation and refuges. These complexities may include, for example, complex mental health issues, alcohol and other drug (AOD) use, aggression and other challenging behaviours.

We understand that emergency accommodation needs to be safe for everyone, however we also stress that victim survivors with complex mental health and AOD issues can't be excluded or overlooked either and we raise this as a priority for consideration.

We would like to see the Inclusion Round make services safer and more inclusive for these cohorts.

### **Noise control**

The importance of considering the needs of clients and surrounding communities from day one in the planning and building process, particularly if the proposal is for the development of high-density living structures. Architects need to have a very good understanding of trauma and client complexities when embarking on the design process, as far greater noise control is required than a standard build. There are also other challenges about high density living, especially when considering the fact that all residents of the emergency accommodation have experienced violence and complex trauma.

We propose that a core and cluster model is best to meet needs at the point of crisis (and so for emergency accommodation) however we are interested in the scope for a dispersal model for transitional and longer-term housing, to allow women and children greater privacy, 'normality' and community integration.

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## Conclusion

The Bayside Peninsula and Southern Melbourne Integrated Family Violence Partnerships along with all organisations who have contributed to this Discussion Paper submission wish to thank the Department of Social Services for the opportunity to provide feedback on the Safe Places Discussion paper. We strongly support the commitment to invest in building more purpose-built emergency accommodation, and we hope that our feedback can be taken on board to ensure that emergency accommodation funded under the Inclusion Round is as accessible as possible to diverse community groups.