



Safer Places Emergency Accommodation Program (Inclusion Round)

The National Women's Safety Alliance (NWSA) welcomes the opportunity to provide feedback to the Department of Social Services on the *Safer Places Emergency Accommodation Program* (Inclusion Round).

The NWSA brings together 309 individual and organisational members, including those who provide front-line services, research, and legal expertise to women and children escaping domestic and family violence. Our interest in Inclusion Round reflects our representative framework and the role of the *Safer Places* program, and increasing the supply of supported housing, in achieving the relevant outcomes of the *National Plan to Eliminate Violence against Women and Children*.

Our response to the discussion paper makes comment on the following:

- The funding model, specifically the need for women's specialist services to be resourced for the ongoing management of *Safer Places* services as well as to develop their own in-house expertise to manage future projects.
- Contingencies to respond to unavoidable cost blow-outs.
- Flexibility of tenure and housing types.
- The 15-year designated use period.

Background

We welcome the commitment to a second round of funding for the *Safer Places* program and the increase in funding to \$100 million over the next five years, from the initial investment from \$72.6 million. Several of our members were recipients of the first round of the *Safer Places* program and their feedback informs this submission.

It is our understanding that the initial *Safer Places* program was designed with a specific view to lifting supply of supported housing with women's specialist



services considered central to the success of the model. In the first round of funding some of our members were successful to undertake build projects or purchase property, directly contributing to the supply of supported housing for women escaping violence. Partnerships between women's specialist services and project management were encouraged particularly where women's specialist services did not have in-house capacity to lead a build project.

This recognised that while many specialist women's services may not have the risk appetite or project capacity to participate in a capital works development, they are best placed to deliver support services to women and children in need of housing after leaving violence.

Program funding model

The model emphasises co-investment arrangements for the capital works component and future capacity to manage the delivery and maintenance of the service and the build.

It is our view that while there is support for the collaborative framework, the program must complement the broader objectives of the *National Plan* to enhance the professional development, skill, and capacity of women's services. There is a concern that without investing in the capacity and project management skills in the women's services sector, that future rounds could eventually dilute or eliminate women's services involvement in the *Safer Places* program. Given immense and longstanding resourcing limitations, there is simply no extra capacity to take on or develop the skills needed to manage capital projects and we urge that building this in-house capacity be considered as a strategic investment in the sector and the goals of the *National Plan*.

As is often reported to us however, service funding does not keep pace with demand. Under the first *Safer Places* round, there was no funding for women's specialist services to manage properties and support tenants who had been housed under the program, compounding the resource pressures already being



felt on the front line. This funding gap has not been addressed in the latest discussion paper which states that applicants are responsible for 'funding DFV and other specialist wrap-around services'. We support the model where women's specialist services are responsible for tenant support and property management but urge that this be funded under the Inclusion Round model, as well as any future rounds.

Flexibility of housing models and contingency funding

Local delays from planning approval processes, appeals and disputes to new developments as well as administrative delays at the Commonwealth level can impact project timelines and construction costs. The discussion paper does not give an explicit consideration to these contingencies and the fact that unavoidable cost blow-outs could skuttle or seriously delay projects. While there is the potential for some flexibility in the funding agreement, this does not appear to capture any contingency funding.

The discussion paper directs proposals towards adopting either a refuge or crisis model without exploring more contemporary, person centred, and comfortable options for clients. In this regard, we urge the Inclusion Round to consider transitional and longer-term housing options under the proposal.

Our members have also raised concerns with the discussion paper's suggested tenancy period of 12 months or less. While some clients may only need accommodation for a short period, we urge against making short-term leases a funding pre-requisite. Some clients may simply need more time to recover, however ongoing housing shortages coupled with rental costs may create delays in tenancy turnover, even where a tenant is ready to move on. Short-term lease arrangements can also prevent clients being able to establish a consistent rental history and local social networks, both of which are fundamental in recovery and rebuilding their lives. We urge the Inclusion Round to consider transitional and longer-term housing options under the proposal.



15-year designated use period

While the partnership model presents a viable funding opportunity in the short term, given the shortage of project management expertise in the women's sector, there are concerns as to what this may mean for properties and tenants when the 15-year designated use period ends.

For example, where funding is directed to philanthropic groups, community housing groups or other private proponents, some of whom may not be driven by the shared values of the women's specialist services, there is a potential that the *Safer Places* properties will eventually cease to be available. This would have an immediate affect both on tenants as well as on the cumulative supply of supported housing across the country, 15 years hence. Ideally, the Inclusion Round's partnership model should be designed in such a way as to mitigate against, or allow partners to plan around, this outcome. This would minimise both the significant impact on vulnerable tenants and their service provider who will be desperately trying to re-house their clients.