



Submission to Safe Places Emergency Accommodation Program (Inclusion Round) Discussion Paper

March 2023

The Queensland Program of Assistance to Survivors of Torture and Trauma (QPASTT) welcomes the opportunity to provide comments on the *Safe Places Emergency Accommodation Program (Inclusion Round) Discussion Paper*.

QPASTT congratulates and welcomes the Governments' initiative to increase the stock of emergency accommodation to women and children fleeing domestic and family violence (DFV). Additionally, we applaud the commitment to addressing the specific needs of women and children from First Nations, Culturally and Linguistically Diverse Background and those with disabilities. We recognise that these cohorts of women and children have specific needs that are frequently unrecognised and unmet in many social service initiatives where demand outstrips capacity. Addressing this inequity of high vulnerable women and children's access to emergency accommodation is a demonstrable step towards inclusion and belonging of all members of our community.

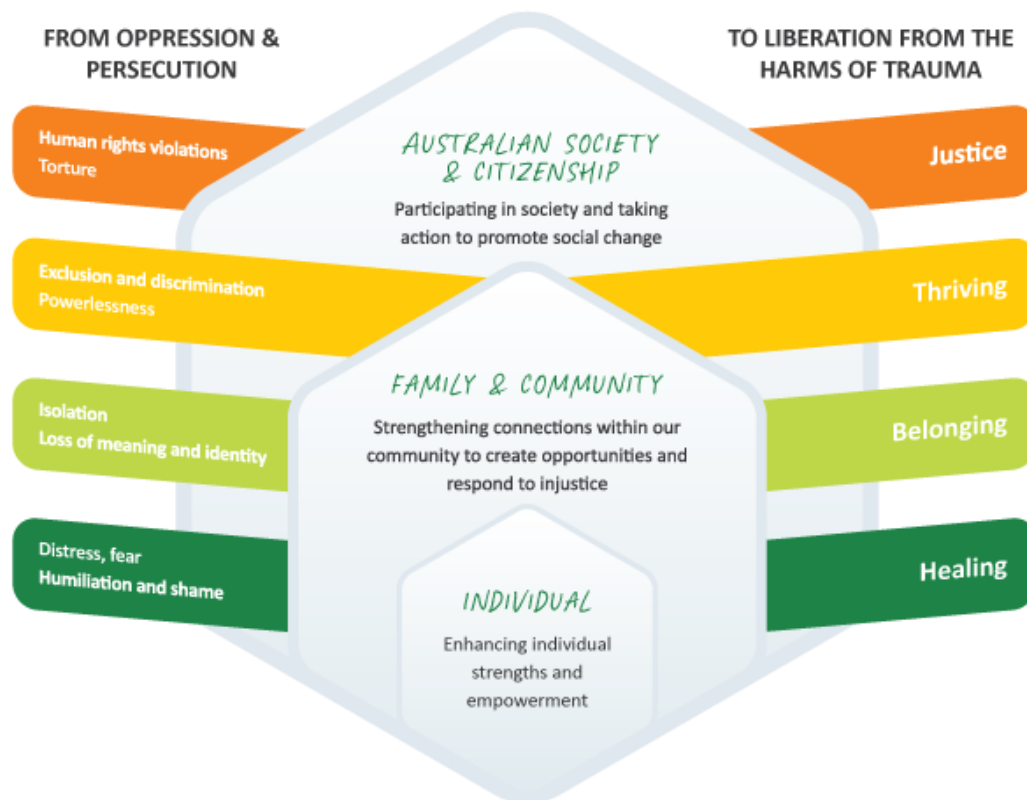
QPASTT is pleased to provide comments on the draft paper and eagerly looks forward to the successful realisation of this program.

About QPASTT

Founded in 1995, QPASTT (Queensland Program of Assistance to Survivors of Torture and Trauma) provides specialised, culturally responsive services to promote the health and wellbeing of people in Australia who have sought safety from persecution, torture and war related trauma.

QPASTT is committed to creating a safe, inclusive and equitable environment for people from all genders, sexualities, religions and cultures. Our vision is for people from refugee backgrounds to live lives liberated from the harms of torture, trauma and human rights injustice. Our purpose is to nurture meaningful futures by assisting people from refugee backgrounds to heal, belong and thrive in our community.

Our refugee trauma recovery framework



QPASTT acknowledges the First Peoples of Australia and their leaders past, present and emerging. We recognise the continuing trauma caused by losses of children, language, lore and land and the impact that this continues to have on psychological, physical and spiritual wellbeing. We recognise that since time immemorial, First Peoples have nurtured communities of belonging and thriving and we work in solidarity towards a future of healing and justice.

QPASTT is a non-profit Company Limited by Guarantee and a registered charity with no political or religious affiliations. The Commonwealth and Queensland governments fund our work.



QPASTT is a member of the Forum of Australian Services for Survivors of Torture and Trauma (FASSTT), a network of eight specialist rehabilitation agencies that respond to the needs of survivors of torture and trauma who have come to Australia from overseas. There is a FASSTT member agency in each state and territory in Australia.

In 2021/2022, we supported 7,796 clients from over 85 countries through both individual or family counselling and group work – a 17% increase since 2019.

Culture and community-based healing and connectedness is the foundation of our approach to wellbeing.

5,645 people participated in QPASTT social, therapeutic and wellbeing groups, events and activities, co-designed with community members to meet their needs.

2,151 people engaged in over 15,000 counselling sessions, more than 40% of whom were 25 years of age or under, and 218 were people seeking asylum.

Focus of this Submission

Due to the nature of QPASTT's experience as a specialist refugee trauma recovery service, without direct experiences in housing service provision, we are limiting our attention to the questions in the discussion paper that specifically address needs of women and children from CALD backgrounds, service suitability and criteria for assessing potential applicants to this program.

We would, however like to make comment on some general elements of the program:

1. Prioritisation of locations with high unmet demand: This is a rational approach to resource allocation, however for many culturally diverse communities, knowledge of and willingness to access services, particularly crisis services can be very low. There is a much greater propensity for community members to seek support within their own ethnic community. This means that informal networks and resources are far more frequently accessed than formal service supports. Community members will seek advice and guidance from trusted members of their community rather than reach out to unknown services. For issues that are highly sensitive, including DFV, there is even greater reluctance to access support outside of the cultural community and if this occurs, it can bring with it a high level of fear of cultural exclusion, stigma and shame. Therefore, in evidencing high unmet demand from CALD communities it is essential to acknowledge that frequently the demand is invisible or significantly unreported.

Flexibility in accepting informal evidence of high unmet demand will be required if the Safe Places Emergency Accommodation Program is to truly meet the needs of women and children from CALD backgrounds.

2. Value for money through high levels of co-investment: As above, prioritising co-investment is a rational approach to maximising the stock of emergency accommodation leveraged through this program. However, the cohorts of women and children targeted through this inclusion specific program are some of the most financially constrained within our community. There are limited benefactors, financially successful enterprises or corporations that have a social investment priority of women from CALD backgrounds. The community services that deliver



to the CALD sector frequently experience far greater demand than they can meet through existing funding relationships (particularly services located outside of New South Wales and Victoria) and in regional and remote locations.

If this is to remain a criterion to determine priority, the Department is urged to consider scaffolding support for co-financing opportunities for specialist emergency accommodation providers, particularly those in states and territories with comparably lower state based resourcing.

3. Recognition of vulnerability of CALD LGBTIQ+ community members: There is scant data available on the experience, needs and service response to people from migrant and refugee backgrounds who identify as Lesbian Gay Bisexual Transgender Intersex Queer plus (LGBTIQ+). Yet this is a highly vulnerable population facing multiple forms of discrimination including racism, homophobia and transphobia. The results of the first national survey of the settlement experience of LGBTIQ+ forcibly displaced people were released in February 2023¹. This survey found that 37% of participants had experienced sexual and gender based violence since arriving in Australia. This is significantly higher than the average Australia rate of violence. Yet 86% of respondents did not access sexual assault and family violence services, and 80% did not access housing or homelessness services. This indicates that CALD LGBTIQ+ people are in need of tailored and priority funded crisis services, including culturally safe emergency accommodation.

Response to Questions in Discussion Paper

Questions 9: What are the best measures to determine an applicant's suitability to meet the needs of women and children from CALD backgrounds?

There are a range of operational service delivery practices that would indicate that an applicant is aware of and organized to meet the needs of women and children from CALD backgrounds. These include:

1. Use of Interpreters

Policy and procedures to consistently use accredited interpreters or appropriately trained bi-cultural staff. Use of interpreter policy should include the client's ability to choose:

- the gender of the interpreter
- the type of contact - face to face, telephone or online interpreter
- a telephone or online interpreter from interstate to further protect privacy

The policy should also contain:

- mechanisms to check-in with client about their satisfaction with the interpreter
- a commitment to consistency of interpreter across multiple occasions of use where possible

Children should never be used to interpret for a parent, particularly in situations where sensitive information is shared. The applicant needs to have processes for staff to provide feedback to interpreting services when required, to ensure the high quality of language support provided to

¹ Forcible Displaced Peoples Network (2023) *Inhabiting Two Worlds at Once: Survey report on the experiences of LGBTIQ+ Settlement in Australia*. Released February 2023.

clients. Interpreters should be offered to all clients, rather than clients needing to request an interpreter, which they may not have the experience or confidence to do.

2. Provision of a dedicated prayer space/faith room

Within the emergency accommodation, an appropriate (clean, well-positioned, discrete, private, quiet) prayer space or faith room must be provided that will enable women and children from diverse religious backgrounds to practice their faith. Location of and procedure for access to the faith room should be made known to all clients rather than clients requesting this information.

3. Provision of culturally sensitive food/meals

The applicant will need to provide initial food packs and emergency meals suitable for a diverse range of cultural and religious groups, including halal, kosher and vegetarian food options. Any shared cooking spaces ideally would be free of any non-halal and non-kosher foods. Queries about dietary requirements should be mandatory on intake to the service rather than the client having to request this.

4. Visible representation of cultural safety

The applicant will plan to have clear signs in multiple languages (noting the diversity between common migrant languages and languages more commonly spoken by people of refugee background) positively affirming commitment to ethnic, religious, gender and sexuality diversity. People from minority backgrounds frequently look for indicators that the service is culturally safe and that they are welcome. Expectations of confidentiality, mutual respect, dignity and collaborative problem solving between all clients and staff must be clearly affirmed in the intake and initial orientation to the accommodation.

5. Recognition of diversity within diversity – family size and structure

In 2021-2022, QPASTT worked with clients from over 70 cultural backgrounds. While the CALD community is distinguished from non-CALD and First Nations populations, this is by no means a homogenous client group. The size and structure of families varies significantly within the CALD community with some very large family groups of children, as well as much smaller families. Emergency accommodation will need to be flexible to accommodate larger families with children of a wide range of ages. Additionally, while there may be similarities within a particular ethnic group, factors such as age, settlement experience and life experience can have a strong influence on an individual's needs, particularly at point of crisis. The applicant will need to evidence their ability to remain client centered even if the service is tailored for a specific ethnic or religious cohort.

Question 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?

The Livable Housing Australia design guidelines provide strong standards for physical safety, accessibility, privacy and security. This is all essential. However it is also notable that guidelines are



anglo-centric, focusing on single unit living where families live entirely separately. For some CALD women and children this will be preferable. For some, particularly for those who have a much stronger or recent experience of living in collective cultures, provision of some shared communal spaces between residences such as access to garden, tea room, play areas for children and prayer spaces could increase cultural safety.

Question 13: What is the best measure for determining an applicant's ability to support clients using the emergency accommodation over the designated use period?

A number of issues raised in response to question nine above are applicable here. Additionally, we would like to raise the following service support measures:

1. Evidence of collaboration and partnership with other key organisations: the application should demonstrate their connection to and ability to partner with key organisations such as Immigrant Womens Support Service and Womens Legal Service (in Queensland) as these two community legal services have extensive experience and skill in supporting women from a CALD background. This could be evidenced by the applicant through indication of dedicated referral pathways, or through a MoU detailing the nature of the service collaboration. Additionally, the ability to collaborate with other specialist services that may already be involved in the health and wellbeing of the women and children access the service should be highly regarded.
2. Private meeting space onsite for external services to meet with clients: Given the need for complex wrap around support and the highly sensitive nature of DFV in CALD communities, provision of a private (quiet, discrete, clean, with access to telephone for phone interpreter) onsite space would greatly assist clients accessing a range of supportive services in a timely manner.
3. Compulsory training and support structures for all staff: All the applicants' staff should complete compulsory trauma aware practice and cultural safety. Additionally, the applicants' staff will require an internal and external structure of support to ensure that they are well and able to continue to provide high quality, consistent, trauma informed support. This should not be limited to staff with a lived experience or lived expertise.

Questions 14 and 15: Definitions and alternative accommodation options

In response to the questions regarding appropriate definitions of 'emergency accommodation', a 'safe place', and a 'specialist service'; the length of time within the definition of emergency accommodation; and possible alternative accommodation options – QPASTT strongly recommended that this is discussed with women from CALD backgrounds during the consultation process. The representation of women from a diverse range of ages and ethnic backgrounds within the CALD community in the consultation process.

QPASTT staff have reported how disproportionately challenging it is for single parent households to secure long term accommodation, as compared to other client groups. From an internal staff survey of client experiences, only six percent (6%) of single parent households were able to find secure



housing after experiencing homelessness in the 12 month period between August 2021 and August 2022. The majority of single parent households are headed by women, which indicates the significant challenge that may be experienced by women and children exiting emergency accommodation. This also indicates the need for emergency accommodation services to be complimented with an increase in affordable social and community housing options with supports for women and their children.

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

We recommend the following items to be addressed in advice, templates or checklists provided to assist applicants:

- Evidence of unmet demand from formal and informal sources
- Evidence of use of interpreters, interpreter policies and procedure
- Evidence of trauma informed culturally safe service provision through culturally safe and trauma informed client intake, service provision, exit planning etc.
- Evidence of compulsory staff training on trauma informed and culturally safe practice
- Evidence of current or anticipated partnerships with legal, mental health, welfare and/or community organisations. Letters of confirmation or support partner services strongly encouraged.