



Government  
of South Australia  
SA Housing Authority

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# Safe Places Emergency Accommodation Program (Inclusion Round)

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**SA Housing Authority submission**

March 2023

## Summary

The SA Housing Authority (the Authority) is supporting of the Safe Places Emergency Accommodation Program, and welcomes opportunities to enable service providers to develop and implement innovative, place-based responses for women and children leaving violence.

The Authority has limited its commentary to areas of particular interest, and has provided some additional thoughts not directly aligned to the discussion questions, for further consideration.

## 3. Program Funding

### **3.2 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?**

The Authority notes that it is extremely difficult to source debt without first sourcing grant and equity funding. The grant funding approved, including the timeframe for receipt of said funding, is a key component of what the debt looks like.

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

The Authority notes that for debt-funded models and complex special purpose vehicle-type arrangements, providing 100 per cent of grant funding up front is of substantial benefit to suppliers. This is of particular importance to Aboriginal Community Controlled Organisations (ACCO).

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

The Authority notes that it is not possible to secure debt funding and also allow for a six-month development period. Interest rates and other parameters are changing regularly, which in turn change the nature of the debt offer. Consideration should also be given to funding models that will support the development and growth of ACCO in the sector.

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

Other ways to support applicants include face-to-face information sessions in metropolitan, regional and remote locations to provide advice and answer questions. Also providing information in various languages and accessible formats.

## 4. Eligibility and Assessment Process

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

The Authority seeks further clarification on what methodology will be used to ensure a reasonable distribution of proposals between states and territories. Land economics are not comparable across all jurisdictions, which will result in variance in cost outcomes. In determining the efficacy of proposals, an assessment of the service's capability to undertake exit planning and provide adequate support to transition out of crisis into longer-term accommodation and stability, is imperative.

It is essential that high quality case management support is in place to complement new facilities developed through the grant program and that appropriate worker / client ratios can be maintained. Section 4.2.2, regarding specialist services and appropriate support only provides limited information on requirements and further detail could be provided. This could include outlining factors that will be assessed in determining the appropriateness and adequacy of support offered. Additional focus could also be directed towards the provision of support and other services for dependent children of people utilising safe places accommodation.

Section 4.2.3 outlines the project quality criteria, this should include appropriate cooking facilities for families to reduce cost of living pressures and support appropriate nutritional choices.

#### **4.7 Are there additional criteria that should be considered?**

The Authority suggests the consideration of the Priority Reforms under the *National Agreement on Closing the Gap* (particularly reform areas 1 - *Formal Partnerships and Shared Decision Making* and 2 - *Building the Community-Controlled Sector*) in the assessment criteria, particularly in regions of higher Aboriginal populations.

Consideration of the assessment criteria to include procurement and supply chain opportunities for Aboriginal participation in construction, maintenance and/or service provisions, particularly for Aboriginal-specific facilities.

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

Key measures for determining ability to meet the needs of Aboriginal women and children would include the location of services, the applicant's existing connection to community, and/or demonstration of how they would gain support and trust from the community and service users. Demonstrated ability to provide safe places and appropriate accommodation services in regional and remote locations is key, noting the challenges when women and children may have to leave the home but remain in community to preserve other vital connections.

An important consideration is the promotion of Aboriginal managed organisations direct involvement in the provision of FDV services. This includes ACCOs and Aboriginal Community Controlled Health Organisations (ACHO). It may also include consideration of the use of Aboriginal Business Enterprises (ABE) to undertake commercial work (eg building or supplying materials).

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

The period of designated use is appropriate; however, provision could be made for some mutually agreed change of use over the term of the agreement. This could include, for example, using some or all of the assets for other FDV related responses including transitional or longer-term accommodation.

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

While the paper identifies that other Government initiatives are providing support for transitional housing and longer-term accommodation responses are, further consideration could be directed toward additional investment in post-crisis accommodation options. This includes developing exit pathways to more stable accommodation to meet client needs and to enable new service opportunities within crisis services.

In order to support service responses which minimise the dislocation of women and children from their homes, consideration could be given to the development of crisis accommodation facilities to respond to perpetrators of FDV.

For consistency of language and understanding, the Authority requests that "Community Housing Provider" be explicitly added to the list of eligible entity types, acknowledging that providers will fit into one or more of the existing categories.

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

Quality proposals could include joined-up partnerships with ABEs, ACCOs, and ACCHOs to build capacity and identify training gaps and emerging needs from a community perspective.

## Additional Comments

Options for people in LGBTIQ+ communities could be considered as part of the Inclusion Round, e.g. people in same sex relationships or who identify as transgender or intersex. This could be considered as a separate group, or as part of the intersection with the other inclusion groups.