

## **Safe Places Emergency Accommodation Program (Inclusion Round) Program Design Discussion Paper**

### **Homes Tasmania Response**

#### **General Response**

The Tasmanian Government is very supportive of the Safe Places grant program and the opportunity to provide feedback on the *Program Design Discussion Paper* in a collaborative way is appreciated.

Safe Places has been a successful program in Tasmania with three projects providing an additional 23 new dwellings for crisis and transitional accommodation. The Tasmanian Government provided co-funding for the capital component of these projects.

#### **Integration with national and state reforms**

It is important that the next grant round is aligned with other Australian Government programs and funding options so that organisations are able to demonstrate security of co-funding options that may include:

- the Housing Australia Future Fund (HAFF):
  - \$10 billion to build 30 000 social and affordable housing properties in the first five years, including allocating 4 000 to women and children leaving family violence and older women on low income who are at risk of homelessness
  - \$100 million over five years for crisis and transitional housing options for women and children leaving family violence and older women on low incomes who are at risk of homelessness
- National Housing Finance and Investment Corporation (NHFIC) funds:
  - organisations may seek to access loans, grants or equity finance from NHFIC to support infrastructure projects for new housing supply.

This should include consideration of timing of national programs and funds that provide the potential of multiple fund sources for Safe Spaces proposals that may also include other private, charitable or State Government contributions.

There continues to be a strong interest in Safe Place grants from the Tasmanian Government for this next round. This includes the potential to directly submit proposals to undertake capital projects and/or co-funding non-government organisations to undertake projects. The eligibility criteria should ensure that the grants round is inclusive for both Government and non-government organisations. Homes Tasmania operates as an independent statutory authority in Tasmania and it seems that this is an eligible entity for the grants round in the current *Discussion Paper*.

Tasmania is well positioned to respond to grant proposals. Tasmania has the most integrated housing and homelessness system nationally. The service model involves key partnerships with the non-government sector to provide the best outcomes and responsive services for Tasmanians in need of housing.

The Tasmanian Government also has a strong interest in being involved in the approval process for potential grants to ensure that the design of new services is aligned with our housing and homelessness reform agenda and to deliver best practice and sustainable housing models.

The Tasmanian Government and/or Homes Tasmania may be keen to consider co-investment models for capital components without service providers being initially identified. However, this will require a key commitment to procure service provision that is consistent with the Tasmanian model of housing and homelessness service provision.

It is also recognised that ensuring a sustainable model of ongoing maintenance and recurrent operational funding are critical for the success of grant proposals.

### Demonstration of need

In Tasmania, significant effort has been undertaken to determine current and future demand projections for housing and homelessness services. This information will be very valuable in the assessment of Criterion 1 – Demand and location. It is noted that the consultation will take place with the Australian Institute of Health and Welfare (AIHW) and jurisdictions to determine the best sources of data, and this information can be provided to assist in the guidelines for grant proposals and/or assessment of proposals.

An important consideration for Tasmania is the proposed prioritisation of proposals that enable access for First Nations women and children, women and children from a culturally and linguistically (CALD) background and women and children with disability. Such client groups are a priority, and Tasmania is especially committed to Closing the Gap to address indigenous disadvantage.

However, Tasmania's Specialist Homelessness Services are structured to specific target groups based on age and sex. For example, a shelter for young men under the age of 18. This means that there are not specific services that are designed for clients who are indigenous, CALD or with a disability. These client groups are supported and assisted through the generic services. All services should be inclusive and be able to manage a diverse range of clients, albeit consistent with their eligible target group.

There is a significant need for Specialist Homelessness Services in Tasmania across all client groups, and high levels of unmet need. Tasmania has the third highest number of daily unassisted requests for Specialist Homelessness Services (46.4 daily average unassisted requests in 2020-21).

It is acknowledged that proposals in locations with high unmet demand for emergency accommodation, including for other cohorts of women and children leaving family and domestic violence (FDV) will be considered. However, it is very important for Tasmania that all levels of unmet need across all locations and priority groups are considered, to ensure that Tasmania is not disadvantaged by having lower levels of population groups and clients that are proposed for priority consideration in the *Discussion Paper*.

## **Specific Response to Questions**

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

The proposed grant funding of between \$500 000 to \$8 million is appropriate and would support both small and large projects.

There should be balanced consideration of projects that may not have high levels of co-investment. This is particularly significant for smaller organisations that may operate without access to capital or recurrent funding other than through charitable sources or Australian and Tasmanian Government funding. Small organisations without a high level of co-investment of capital funding should be considered equitably in proposals, as long as appropriate fund sources are identified and secured.

The grant materials may benefit from including an estimated cost per dwelling or bed that assists in comparing value for money between projects. For example, the Tasmanian Government provides an average grant per dwelling for new social housing projects and projects are assessed and considered against this average amount.

### **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?**

There are challenges in aligning the Safe Space Inclusion Round funding with other Australian Government funding opportunities. This may include linkages with funding from HAFF and NHFIC, particularly when mixed-used developments are proposed. This may mean that proponents outline that they are reliant on these funds to proceed with Safe Place grants in their proposals if other fund sources are required. There may be issues with alignment of timing and requirements of these funding options.

The proponents should be able to demonstrate support for funding contributions from State Governments and/or charitable sources if relevant for their proposals. There should also be in-principal support from State Governments if the existing service model and/or capital involves a partnership or contractual arrangements with State Governments, even if the new capital funding is not reliant on Government funding. In Tasmania, it is anticipated that most proposals will also require additional recurrent funding that will need to be supported by Government.

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

The proposed payments made on completion of key project milestones seems appropriate.

There could be additional detail that clearly distinguishes between project start, construction start and construction completion such as:

- Signing of a Grant Agreement
- Development Application Approved
- Construction Start
- Base and Frame

- Dwelling Complete (lock up)
- Practical Completion and activation (tenanting).

Proponents would need to ensure this is consistent with their contracts with construction providers, or that they have sufficient funding to support payments to contractors if required.

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

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

A six-month timeframe/Development Period awarded to some organisations to allow time to progress their proposals to a successful standard would be valuable. However, this may be more appropriate for a 12-month period to allow for two milestones of signing of a Grant Agreement and Development Applications being approved.

Organisations may also be focused on operational/service delivery rather than having expertise in developing grant proposals, therefore time and relevant expertise to assist in the proposals would be valuable.

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

It is supported that there are presentations/information sessions for applicants to assist in the development of proposals. This may be useful when there may be cultural or accessibility barriers to considering written materials.

Additionally, examples of previously successful projects and example proposals may assist potential proponents. It would also be useful to have clear key contacts to provide access to support, advice and guidance for proponents during the preparation process.

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

In general, most of the eligibility and assessment criteria appear appropriate, with detailed comments below.

#### **7. Are there additional criteria that should be considered?**

Criterion 1: Demand and Location

It is important that criterion enable an equitable opportunity for organisations in regional and remote communities to apply. In Tasmania, only Greater Hobart is classified as inner-regional, with all other areas as regional or remote.

This will need to ensure that there is a priority or level of need identified for Safe Places within these areas, but it is important to ensure that small organisations, and projects in regional and remote areas are not disadvantaged from applying.

#### Criterion 4: Capacity and capability

There should be the opportunity for smaller organisations to partner with other organisations to demonstrate capability in undertaking capital developments. Some organisations in Tasmania may not have had previous experience in undertaking capital projects. Therefore, the criterion should clearly outline that capacity may be demonstrated by partner organisations and co-funding organisations that demonstrate the relevant previous experience.

It is supported that the organisation should have experience in delivering the relevant services required as currently outlined for the criterion, and specialist ability to deliver FDV services. In Tasmania, this may require participation in relevant accreditation and training. Therefore, the criterion should also include the assurance that providers participate in relevant accreditation and training as required by relevant jurisdictions.

In Tasmania, this will also require an ability to deliver services consistent with the housing and homelessness services delivery model under Housing Connect.

#### **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?**

As mentioned in general comments, significant effort has been undertaken in Tasmania to determine current and future demand projections for housing and homelessness services that may assist in assessment of level of need for services.

All services should be inclusive and be able to manage a diverse range of clients, albeit consistent with their eligible target group. Services should also be able to accommodate various family types (if within their target group) and provide accommodation to match growing demand from families.

#### **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?**

All developments supported by Homes Tasmania are required to meet at a minimum Silver Level on the Livable Housing Design Guidelines (LHDG).

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

In Tasmania, 30 years is the time period preferred for retention of use in our current contractual agreements. This aligns with common life cycle period of assets before significant maintenance works would be required. The National Rental Affordability Scheme (NRAS) highlighted the undesirable impact of short retention periods (10 years). Whilst the use of a dwelling should be retained over a 30-year period, there may be options to reconsider or change providers in some instances.

It should be demonstrated that the accommodation will continue to meet the need and demand over time, particularly in relation to location. Ensuring that applications are consistent with Tasmania's data on current and future demand would support this demonstration of need over time.

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

Important factors are ensuring that proponents have a proven history and demonstrated capacity in delivering quality services, as well as appropriately qualified personnel. The proposed criterion reflect that proponents are required to have this relevant expertise.

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

**a. Should the definition of 'emergency accommodation' include longer stays?**

The definition of emergency accommodation is supported. However, there does appear to be a gap in Australian Government programs for longer-term supported accommodation. Safe Places and the HAFF will provide funding for crisis and transitional accommodation, and HAFF will provide funding for social housing. This leaves a gap in supporting projects that provide longer term supported accommodation. This is a quality service model in Tasmania where supported accommodation may be provided for young people transitioning to independence (Y2Independence) or long-term accommodation for adults with support needs.

The definition of safe place is supported, However, in some instances some shared facilities may be required, such as shared laundries. There should be an avenue for proponents to outline their accommodation model that is considered not strictly within the requirements of all self-contained living spaces.

As mentioned previously, it is agreed that proponents should have experience in delivering the relevant services required as currently outlined for the criterion, and specialist ability to deliver FDV services. In Tasmania, this may require participation in relevant accreditation and training. Therefore, the criterion should also include the assurance that providers participate in relevant accreditation and training as required by relevant jurisdictions.

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

See above, there is a gap in funding for long-term supported accommodation.

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

See responses to Question 1 and Question 5.

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