



Safe Places Emergency Accommodation Program (Inclusion Round)

March, 2023



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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion: salvationarmy.org.au/about-us

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.

More information about The Salvation Army is at **Appendix A**.





Questions:

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

The Salvation Army has completed 2 builds of core and cluster family violence accommodation in the last 2 years and has 3 projects currently under construction around the country. We strongly suggest increasing to \$10m to reflect current conditions. Inflation, scarcity of building materials and high cost of building materials have led to substantial increase in costs. In regional areas, building companies want to place preferred trades people in accommodation which increases cost of build.

It is absolutely worth noting that across the country many family violence (FV) emergency accommodation programs are running from outdated and run-down buildings. While we appreciate the funding is designed for an expansion of accommodation services, it is worth noting that conditions in many existing services are less than ideal and it is appropriate to consider renovation of existing properties with expansion as eligible for the grant.

A significant gap in available resources is that suited to culturally and linguistically diverse (CALD) women who often have large families so need accommodation that will fit all the family; 6+ children. Further, that for some families, multiple generations of women may be at risk.

A further consideration is models such as Viv’s Place, built by Launch Housing in Victoria. The overall cost of the build was \$30 million for 60 apartments. Viv’s place offers permanent social housing with communal outdoor and indoor spaces and co- located with relevant service providers.

Costs will also increase to incorporate needs for children (play spaces etc.), therapeutic spaces

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?

Yes, if the funding for this portion of the build is not included in the grant, it is appropriate to ensure the proposal is feasible.

A note for clarification regarding mixed use- does a single application have to be all in one location. For example, if our application includes transitional and long term accommodation, would it meet the brief to apply to build on different blocks of land within the same application. Those in transitional and permanent housing will not need the same level of access to wrap around services as women in crisis accommodation.

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

A more realistic schedule would be 12 to 18 months. For example, we may have concepts and costed proposals, but not yet commenced the council planning process. In our experience this is likely to take 12-18 months.

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

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





<p>A more realistic schedule would be 12 – 18 months. For example, we may have concepts and costed proposals, but not yet commenced the council planning process. In our experience this is likely to take 12-18 months.</p>
<p>5. Are there other ways to support applicants to develop high quality proposals?</p>
<p>N/A.</p>
<p>6. Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?</p>
<p>Demonstrating partnership with SFVS/housing and demonstrating we have engaged with ACCO's, LGBTQIA+, CALD communities is very reasonable.</p> <p>Currently it is not clear whether there are expectations around number and type of dwellings.</p> <p>Should criteria be a partnership with specialist FV service – this specialisation should be in there, this should be foregrounded as a criterion in itself.</p> <p>Important to include ACCOs in these conversations, can't 'fit into' mainstream needs, including First Nations voices/needs is vital, whether or not you are intending to propose a First Nations-specific service or a generalist.</p>
<p>7. Are there additional criteria that should be considered?</p>
<p>Concern around Federal will fund building, and applicants will find funding for services, etc. This will create pressure on services. Not just family violence services but those adjacent also - e.g. housing, family violence, child protection, early intervention and recovery services. The roll out of grants must include funding to states for the provision of case management support and other operational costs.</p>
<p>8. What are the best measures to determine an applicant's suitability to meet the needs of First Nations women and children?</p>
<ul style="list-style-type: none"> • Partnership with ACCO, • Lived experience consultation, • Inclusive of a range of family structures, • Inclusive of respite support, • First Nations LGBTQIA+ population are included, • Applicant has RAP and diversity strategy in place, • Community consultations are occurring, • Young people 15-18 experiencing violence are considered as a cohort, • Considerations for young men at risk. • A good example, Viv's Place – had specific target of 10% of First Nations families; ensure they reached out to VACCA for expertise. • Need early consultations with ACCOs – understand needs and cultural safety. • While a provider may be inclusive of male victims and diverse family structures, we are often funded by states to provide emergency accommodation (EA) for women & children. This is a systems issue that needs to be overcome.





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

- Demonstrated experience providing quality service provision to women and children from CALD backgrounds, partnerships with a range of services that support cultural and linguistic diversity, model of care demonstrating understanding and prioritisation of needs of women and children from CALD background.
- Lived experience consultation.
- Ensuring access for people on Temporary Visas. Eligibility criteria shouldn’t include the need to be Australian Citizen/certain visa status.

InTouch: recommends training and resources to boost the skills and ability of the refuge workforce, but also that family violence agencies undertake a cultural competency audit and develop and implement cultural competency workplans to provide an equitable service to women on temporary visas. This can be done across all refuges in regional and metropolitan areas.

InTouch have best practice models for family violence accommodations; a best practice model would include:

- 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,
- Accessibility of transport through public transport training and tickets, taxi vouchers and arrangements with female taxi and uber drivers,
- 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, use of appropriate interpreters and provision of simple in-language resources,
- Inclusive practices such as meetings, events, outings and celebrations,
- Co-case management model implemented in partnership with multicultural specialist providers,
- Consideration of specialised area of intersection of family violence with honour-based abuse and modern slavery, including forced marriage and risk thereof,
- Consideration of safe places with a specific focus on young people aged 16- 24.

10. What are the best measures to determine an applicant’s suitability to meet the needs of women and children with disability?

- Diversity and inclusion strategic plan/model,
- Lived experience consultation,
- Plans and operational capacity to have an onsite carer.
Current use of hotels project has shown a lack of suitability for people with a disability.
- Flexibility around properties – scope for minor alternations to property.





- Agreed on minor alterations especially if property becomes long term housing.
- Need to consider carer, this may adjust number of people in a build.
- Well-rounded demonstration that you've managed services accommodation beforehand (motel, rooming house etc.); ongoing requirements to support vulnerable people living together - is onsite management required, out of hours support?

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 National Construction Code (NCC) incorporates all on-site building and plumbing requirements into a single code, setting out the minimum requirements for the design, construction, and performance of buildings throughout Australia.

For Silver, Gold, Platinum standards refer <https://www.dss.gov.au/disability-and-carers-programs-services-government-international/livable-housing-design>

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

State government focus changes, funding changes, might tie providers into a model that is no longer achievable over the 15 years. The risk appetite for applicant for that level of potential change over 15 years would need to be very high. The tender could build flexibility around use as a lot of changes in a 15-year period in terms of service approaches/methodologies.

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

- History of capacity to manage services within budget while meeting KPIs and accreditation standards.
- Existing robust model of care for delivery of services to victim survivors of gendered violence which demonstrates a clear understanding of the causes and consequences of family violence, legislative frameworks, culturally safe service provision, commitment to children as victim-survivors in their own right.
- Appropriate governance structures in place.
- Support of sector stakeholders.

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

In VIC - Emergency Accommodation is up to 21 days, crisis up to 8 weeks and transitional anything over 13 weeks – 18 months. Seeing that the inclusion round focusses on First Nations, CALD and women and children with disabilities, we would anticipate longer stays in emergency accommodation, more so as there are limited exit pathways. Safe place requirement appears to be rigid regarding maximum two persons per bedroom. This may mean that some larger families or families of different structure aren't able to be accommodated at all.

Additionally,

- Size of families means EA stays can be a lot longer as size of families was barrier to suitable exit pathways.
- Needs to be exit plans for people, otherwise 12 months is okay.





- Longer stays would allow organisations currently accepting more women on temporary visas and working well with them, to source transitional properties for them to move into while visas are being processed, prior to finding something more permanent.
- Consideration of specialised area of intersection of family violence with honour-based abuse and modern slavery, including forced marriage and risk thereof.
- Definition of Emergency Accommodation does have a lens which fails to account for the varied needs of different cohorts. For example, First Nations women consistently reporting that they sometimes require respite, yet rules associated with “mutual obligation” often require them to show evidence they are looking for alternative accommodation. Many women with disabilities and women with insecure visa status may not be able to access permanent housing in the timeframes stated.
- Balance of allowing more people but then overcrowding may be seen as normal, but shouldn't be.
- How to incorporate child safety/child needs in build.
- Go with best practice, rigid requirements can restrict ability to meet clients' needs/respect their agency.
- Arrangements offering flexibility in accommodating children and adults with additional needs is done at an operational level, so need to ensure service providers have autonomy in decision making.

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

- Yes – this is particularly relevant for women and children who may be temporary visa holders leaving violence, the additional support needs around immigration and visa status, education and employment, lack of informal support networks in Australia and lack of entitlements to government benefits including Centrelink, Housing and even sometimes Medicare mean women and children on temporary visas have additional support needs. They may require longer support periods than 12 months before they can move out of emergency accommodation in an independent and safe way, which flexibility in length of stay can assist with.
- Housing affordability crisis - In South Australia at least 60% of women who have accessed crisis accommodation have no hope of affording private rental properties in the foreseeable future. Lack of social & affordable housing stock means that extended stays in crisis and emergency accommodation are common.

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

- The Salvation Army often works with clients unable to access FV EA and refuges – complex behaviours, mental health, aggression, AOD use. Proposals which include services for those requiring management and support of these challenges.
- There is the option for a dispersal model rather than cluster model. This would ensure that we do not create further disadvantage or trauma exposure. For example, currently children can share their experiences of family violence with each other as they are all living in the same place, whereas in a dispersal model they are spread across the community.





- In crisis need, core and cluster can meet support needs; dispersal model much more suitable for transitional and longer-term housing.
- Consider needs of clients when building specific housing – e.g., noise in high density living, do architects understand trauma and client complexities in design, accessible to adjunct services.
- Criteria includes location (high need) and accessible services. While we may be able to build building to house people in crisis, there remains ongoing gaps in infrastructure for First Nations women, infrastructure & accessibility gaps for women with disabilities, LGBTIQ+ and CALD women.
- The funding allows for mixed-use proposals where emergency accommodation is combined with longer-term social or community housing which is funded or financed by states, NHFIC or third parties – a proportional contribution to shared amenities only. Access to transitional properties is a key ongoing issue for women on temporary visas which includes a deeper contribution from the participant.





Appendix A About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about the Salvation Army can be accessed at: <
<https://www.salvationarmy.org.au/>>

