

18 October 2023

Dear National Housing and Homelessness Plan Team,

Addressing the failure to recognise and respond to unaccompanied homeless children in Australia

I welcome the establishment of a public consultation process for the National Housing and Homelessness Plan to enable community contributions to this important area of national policy.

This submission responds to focus areas 3.1 Homelessness and 3.2 Homelessness Services in the National Housing and Homelessness Plan Issues Paper (hereafter 'the Issues Paper').

My submission concerns the need to recognise and respond to unaccompanied homeless children; these are children, often as young as 10 years old, who are experiencing homelessness without a parent or guardian. In 2021-22, 12,812 unaccompanied homeless children aged 10-17 sought support from Specialist Homelessness Services and likely thousands more experienced homelessness alone without accessing a service. These children are highly vulnerable yet completely absent from the Issues Paper. Reflecting this absence, my submission identifies two important limitations with the Issues Paper:

- 1. A failure to recognise unaccompanied homeless children as a unique and highly vulnerable cohort and**
- 2. A failure to consider the system and service responses required to prevent and end unaccompanied child homelessness in Australia.**

These failings will **actively perpetuate the current policy neglect of unaccompanied homeless children**. Policy neglect increases the already high risk of harm to these children. Without policy recognition and policy response, these children remain unnamed, without champions, and at the mercy of often unsafe community members who will provide them with 'care' in the absence of safe, well-regulated, preventative and responsive services.

This submission provides three recommendations for policy development.

1. Urgently review the omission of unaccompanied child homelessness from national housing and homelessness policy to rectify policy and service neglect.
2. Develop a standalone, multi-agency Child and Youth National Housing and Homelessness Plan to prevent and end unaccompanied child homelessness.
3. Make unaccompanied homeless children a priority cohort in the National Housing and Homelessness Agreement.

The need for these policy responses is justified below in an evidence summary and discussion of what is needed to prevent and respond effectively to unaccompanied child homelessness in Australia.

Thank you for your consideration of these important issues. I am happy to provide further information and advice.

Yours sincerely,

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About me

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Recommendations

1. Urgently review the omission of unaccompanied child homelessness from national housing and homelessness policy to rectify policy and service neglect.

The National Housing and Homelessness Plan is a key strategic opportunity to recognise the existence and extent of unaccompanied child homelessness in Australia. As has been demonstrated in the Issues Paper, a broad and housing-focused approach to homelessness easily misses the presence of unaccompanied homeless children in our communities and services. Also missed are the specific causes of unaccompanied child homelessness and unaccompanied children's unique developmental and practical support needs as minors. These issues largely fall outside of a mainstream focus on adult experiences of homelessness and housing insecurity.

2. Develop a standalone, multi-agency Child and Youth National Housing and Homelessness Plan to prevent and end unaccompanied child homelessness.

A standalone Child and Youth National Housing and Homelessness Plan should articulate in detail a whole-of-government directive to invest in measures which adequately prevent and respond to unaccompanied child homelessness, whether through education, justice, child safety, health and mental health, homelessness services or elsewhere. Action and responsibility for unaccompanied child homelessness is needed across the child, adolescent, youth and family service system. In particular, a strengthened child and adolescent service system is required to effect the standard of care and support coordination that is required to prevent and respond early to unaccompanied child homelessness.

3. Make unaccompanied homeless children a priority cohort in the National Housing and Homelessness Agreement.

Currently there is uneven recognition of and action on unaccompanied child homelessness across states and territories. A standalone plan and the NHHA together present opportunities to consistently identify and define unaccompanied child homelessness as *the homelessness of children under 18 who are homeless alone, without an accompanying parent or guardian*. Further, specific inclusion of

unaccompanied homeless children as a priority cohort in the National Housing and Homelessness Agreement is a *key national mechanism* through which to compel and progress action, accountability and investment at state and territory level.

Understanding unaccompanied child homelessness in Australia

Unaccompanied child homelessness is the presenting outcome of a lack of care and effective guardianship in children's lives. This submission addresses the hidden and complex experience of unaccompanied child homelessness for those not currently receiving child protection services.ⁱ These children face extreme precarity due to the absence of effective guardianship provided by families or by the State.

Children who experience unaccompanied homelessness may sleep rough, couch surf with extended family, friends and acquaintances, or access Specialist Homelessness Services. During this time it is likely that they will lack adequate access to support, income, health care and education. This results in poor nutrition, lack of physical and mental health treatment and cognitive assessment, increased violent and sexual victimisation, and extended school absences of multiple terms, even years.ⁱⁱ

Research demonstrates the systemic and personal vulnerabilities which powerfully combine to drive the cumulative experience of harm in children's lives.ⁱⁱⁱ Exposure to the intimate partner violence of caregivers, physical, sexual and emotional abuse, neglect and abandonment feature in children's routes into unaccompanied homelessness. Weak and absent systems of support including limited early intervention, continued referral between organisations, and a lack of exit points contribute to and prolong children's exposure to cumulative harm.

Key government agencies including education, health and human services and community-based child and youth services can identify unaccompanied homeless children as 'too hard' and 'too risky' to work with, particularly in the context of intensifying mental ill-health.^{iv}

To prevent and end homelessness for unaccompanied children, any response to the immediate challenges of their homelessness must also work to resolve the underpinning issue of access to effective guardianship and appropriate daily care and support. This means responding to unaccompanied child homelessness requires an emphasis on care *and* housing. It also requires a commitment to providing services responsive to extremes of precarity which are unique to this cohort.

Why doesn't Child Safety respond to unaccompanied child homelessness?

In Australia, child protection and out-of-home care services have evolved as tertiary services only for those children whose abuse and neglect are being investigated, evidenced and successfully prosecuted. Child protection is not a universally available service for children who experience abuse, neglect and family breakdown. Despite encompassing legislation,⁹ children's experiences of unaccompanied homelessness may not in practice meet the high threshold for child protection involvement.

Unaccompanied homeless children consistently present alone to the homelessness sector because it has few access barriers compared to the child protection sector. This has led to misdiagnosis of unaccompanied children's need for developmentally appropriate care and stable housing as 'youth homelessness'. The youth homelessness service system has not historically been designed to support unaccompanied children to resolve family breakdown and guardianship issues, nor to provide the therapeutic residential care needed in both the short-term and long-term. As such, children flounder in this system and the issues they face are often entrenched and made more complex.

Unaccompanied homeless children also present to youth outreach services which, without directly linked supported accommodation capacity, are even less equipped to respond than homelessness services. In these cases, if reunification with family cannot be achieved, outreach workers must provide the best support possible to unaccompanied children who remain homeless and experience continued risk and harm. This is not sustainable practice for youth workers or for children.

Over time, with a properly funded shift to prevention and early intervention, child and adolescent services, including homelessness services, could operate as a significantly strengthened system which prevents the entry of children into statutory care.

The problem of adequate care and housing is a shared one

Protecting the wellbeing of children is the responsibility of parents and governments under Commonwealth, state and territory and international law; thus any lack of care, housing and effective guardianship is a problem shared, at minimum, between families and government. System and service gaps and a lack of support coordination has resulted in unaccompanied child homelessness become a persistent child rights issue in Australia.

Together, family and guardianship breakdown, neglect and trauma, the absence of universal child homelessness prevention, the absence of intensive adolescent support services, and the absence of non-statutory adolescent residential care generate the problem of unaccompanied child homelessness. To be effective, any responses to unaccompanied child homelessness must be directed at increasing direct child, parent and family support and at addressing these broader systemic absences.

How many children experience homelessness unaccompanied by a parent or guardian?

Problematically, ABS Census data collection does not record whether children experiencing homelessness are accompanied or not. In 2021-22 Specialist Homelessness Services Collection data recorded that **12, 812 children** aged 10-17 presented alone to SHS in Australia.^{vi} These numbers, however, are reflective of the number of SHS beds available to children aged 10-17 and the number of children with the knowledge and physical capacity to access them. They do not reflect the actual scale of unaccompanied child homelessness experienced in Australia, which is expected to be much higher given the prevalence of couch surfing and lack of services targeted to this younger cohort.

The homelessness sector will only ever see a limited proportion of unaccompanied homeless children; the experiences of mainstream and targeted child and adolescent services will be crucial to a full understanding of the issues these children face.

The solution: Leadership of a multi-agency approach to ending unaccompanied child homelessness

As is well established in both state and federal policy, the protection, care and support of Australia children is everybody's business.^{vii} A significant challenge is that when family breakdown takes place, multiple government agencies take responsibility for different dimensions of children's wellbeing. For children not receiving child protection services, there is often an absence of a coordinating agency to lead care provision and policy and service innovation.

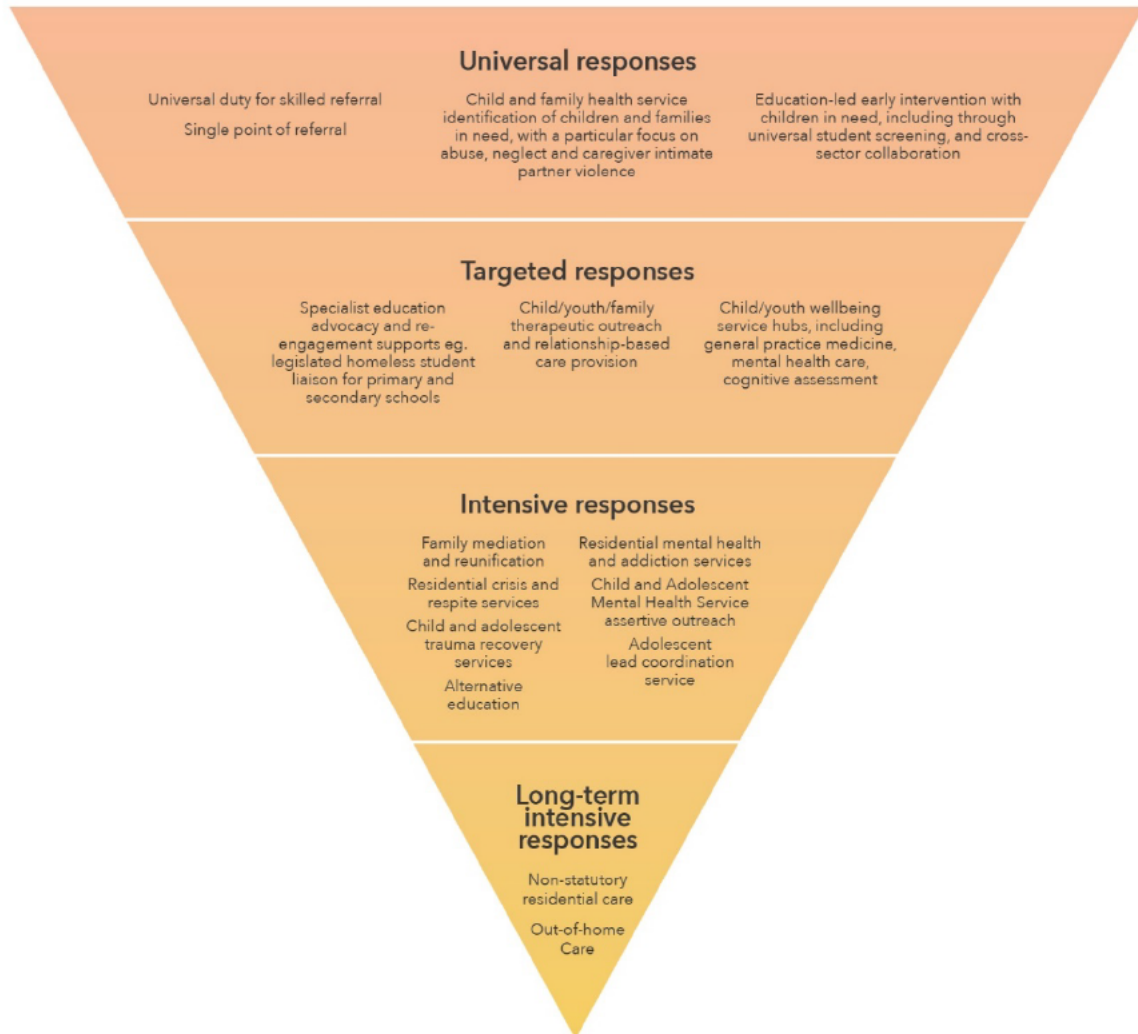
Ending unaccompanied child homelessness requires a multi-agency response but it also requires a lead agency. Further, mechanisms are needed to compel multiple agencies to meet their responsibilities to children with transparency and accountability, or the wellbeing of individual children will not be achieved. These should include public

reporting and the creation and independent monitoring of service standards.

Regardless of which agency and related programs, systems and services coordinate and implement the response to unaccompanied homeless children, there are fundamental elements that require consideration. A public health approach, which encourages broad consideration of different intervention points in complex social problems,^{viii} is employed here to map out the needed policy and practice responses.

The model below describes four different response types which together create a continuum of service provision from universal and targeted responses to intensive and long-term responses. The underpinning assumption is that working to *end* unaccompanied child homelessness is to *simultaneously* act to prevent and early identify family and guardianship breakdown and where this has occurred, to provide a range of developmentally appropriate responses.

A public health model for ending unaccompanied child homelessness in Australia



Universal responses

Universal responses are required for the prevention and earliest identification of issues known to contribute to the breakdown of family relationships and effective guardianship. Universal responses are aimed at providing preventative supports to the whole community, including caregivers and their children, professionals and the public. In particular, schools could be leveraged as universal, statutory hubs that maximise shared effort in prevention and early identification work with children at risk of family breakdown, ineffective guardianship and homelessness.

Targeted responses

Targeted responses are required for children who have not been identified through early intervention who are homeless or at risk of homelessness, or whose challenges require further resourcing or specialist responses. Lead hubs for targeted interventions need to be publicly identifiable and systemically connected, including through shared data. At minimum, targeted responses aim to strengthen children's engagement in family, education and health care and should include low-barrier access to youth health services and legislation to ensure school access and engagement support for unaccompanied homeless children and youth.

Intensive responses

Intensive responses need to be delivered by specialist child and adolescent services. Each agency needs to be held responsible for providing the relevant services. Importantly, in the absence of a consistently present, able and engaged parent or an identified lead agency, unaccompanied homeless children require a skilled system navigator or key worker who can lead the timely coordination of specialist services. These navigators need to be supported by senior-level, cross-agency case coordination to address systemic blocks to successful practice on the ground.

Longer-term intensive responses

Longer-term intensive responses are needed when children are unable to be reunified with family or accepted into out-of-home care. These must provide long-term residential stability and care in response to children's needs – whether statutorily or non-statutorily provided.^{ix} Children in long-term residential care may still require the ongoing support of an adolescent lead coordination service. The immediate provision of housing and developmentally appropriate care fulfills international child rights obligations and intervenes in high-cost trajectories of cumulative trauma, increased emergency health and criminal justice contact.

What is needed to make implementation of these solutions possible?

Whilst poverty and illness, family and relationship breakdown, violence and trauma remain a pervasive presence in human life, in civil society these do not have to determine the life outcomes for families and children. The role of government, in partnership with the community sector in particular, is to prevent and mediate the impacts of negative life experiences and provide opportunities for all to flourish and live lives with meaning.

Decisive government leadership and bureaucratic ownership of a coordinated vision and framework of support is needed to address the underpinning and presenting challenges unaccompanied homeless children face. Unaccompanied children's homelessness will continue in Australia unless strategic effort is dedicated to preventing family and guardianship breakdown and to providing an appropriate suite of responses when this does occur.

A resolution of unaccompanied children's dual care and housing needs will require:

- The voices, wishes and ideas of unaccompanied homeless children, including collaborative policy and service design.
- Political will, leadership and public accountability.
- Clear policy which sets out a strategic vision to preventing and ending unaccompanied child homelessness.
- The availability of a full suite of intensive services which respond to the enduring fact that some children will not be able to return home nor access out-of-home care.
- Legislative clarification to support custody and guardianship arrangements for unaccompanied children, including a focus on authorising support and accommodation services to provide health, education, and social care.
- Monitored standards of care for all non-statutory residential children's services.
- System and service design accommodating:
 - diversity in children's experiences of gender, sex and sexuality
 - cultural diversity and community connection
 - trauma- and attachment-informed practice
 - place-based and child-centered practice.

Given the physical and psychological anguish of experiencing homelessness alone as a child, and evidence which points to early homelessness as a predictor of adult homelessness,^x the development of a standalone Child and Youth National Homelessness and Housing Plan represents a crucial strategic step forward for unaccompanied children and the professionals currently providing care for them in the homelessness and youth sectors.

ⁱ Children can also experience unaccompanied homelessness whilst receiving care, protection and guardianship services from the state. This group raises separate questions about how to respond to the breakdown of care and effective guardianship provided by the state and about the monitoring of care standards in SHS.

ⁱⁱ See for example Noble-Carr & Trew (2018), *'Nowhere to go': Investigating homelessness experiences of 12-15 year olds in the Australian Capital Territory*, Institute for Child Protection Studies, Australian Catholic University, Canberra; Robinson (2017), *Too hard? Highly vulnerable teens in Tasmania*, Anglicare Tasmania, <https://www.anglicare-tas.org.au/research/too-hard/>; Robinson (2018), *Outside in: How the youth sector supports the school re-engagement of vulnerable children in Tasmania*, Anglicare Tasmania, <https://www.anglicare-tas.org.au/research/outside-in-how-the-youth-sector-supports-the-school-re-engagement-of-vulnerable-children-in-tasmania/>.

ⁱⁱⁱ See for example Robinson 2017.

^{iv} See Robinson 2022, *Better, bigger, stronger: Responding to the mental health care needs of unaccompanied homeless children in Tasmania*, Anglicare Tasmania, <https://www.anglicare-tas.org.au/better-bigger-stronger/>

^v For a summary, see Australian Institute of Family Studies (2023) Australian legal definitions: When is a child in need of legal protection, <https://aifs.gov.au/resources/resource-sheets/australian-legal-definitions-when-child-need-protection>

^{vi} Specialist Homeless Services Collection Data Cubes 2011-2012 to 2021-2022 <https://www.aihw.gov.au/reports/homelessness-services/shsc-data-cubes/contents/specialist-homelessness-services-collection-shsc-data-cubes>.

^{vii} See Commonwealth of Australia (2021) *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031*, https://www.dss.gov.au/sites/default/files/documents/12_2021/dess5016-national-framework-protecting-childrenaccessible.pdf

^{viii} For a brief overview, see <https://aifs.gov.au/cfca/publications/defining-public-health-model-child-welfare-services-context>

^{ix} See also a discussion of some existing Australian models of long-term, non-statutory supported accommodation in Robinson (2017b) *Who cares? Supported accommodation for unaccompanied children*, Anglicare Tasmania, <https://www.anglicare-tas.org.au/research/who-cares/>.

^x Cohen-Cline, H., Jones, K., & Vartanian, K. (2021) 'Direct and indirect pathways between childhood instability and adult homelessness in a low-income population', *Children and Youth Services Review*, vol. 120, <https://doi.org/10.1016/j.childyouth.2020.105707>