



Submission No. 77
(homelessness legislation)
A.O.C. Date: 27/08/09

21 August 2009

Ms Alison Clegg
Inquiry Secretary
House of Representatives Standing Committee on
Family, Community and Youth
P.O. Box 6021
Parliament House
Canberra
ACT 2600

Dear Ms Clegg

Re: Inquiry into Homelessness Legislation

Red Cross commends the Australian Government for the directions established in "The Road Home" and the prompt attention to developing a legislative framework into which these policy directions can be embedded. I am writing to submit our views on the development of this legislation; please find them outlined in the attached submission.

Red Cross aspires to an inclusive society where all people are valued, their differences are respected and their basic needs are met so that they can live with dignity. Informed by our work with vulnerable people around Australia and our experience of working with people who are homeless, we are concerned to ensure that the homelessness legislation is written in such a way that:

- effective responses to the situation of homeless Indigenous people are made; and
- a right of eligibility for asylum seekers to housing and support services is included.

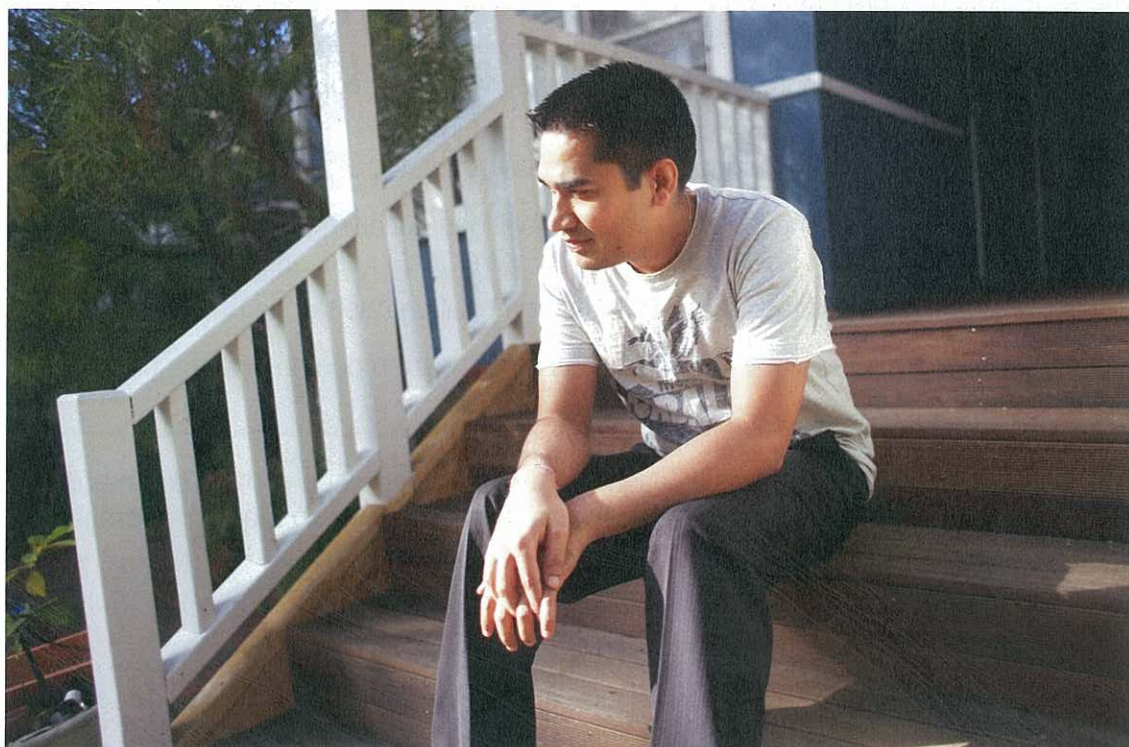
We submit that "The Road Home" should not be left to become a mere background document to the new Commonwealth homelessness legislation. Rather, it should be given continued effect as a part of the framework for action. To achieve this, our submission recommends that "The Road Home" be expressly referred to in a preamble to the homelessness legislation. Within the new policy directions we particularly applaud the "no exits into homelessness" approach as a cornerstone of policy and believe therefore that the legislation should include, as a principle, the same commitment that people should never be released or discharged from care into homelessness.

We wish the Inquiry all the best in developing the framework in which this important piece of legislation will be written.

Yours sincerely,

Michael Raper
Director of Services and International Operations

**Australian Red Cross Submission
to the House of Representatives Standing Committee on
Family, Community and Youth
Inquiry into Homelessness Legislation**



August 2009

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Executive Summary

Red Cross commends the Australian Government for the directions established in “The Road Home” and for the prompt attention to developing a legislative framework to embed these policy directions. The drafting of Commonwealth legislation provides an excellent opportunity to ensure systems, regulatory arrangements, supporting mechanisms and clear roles are established to support the vision which is outlined in “The Road Home”.

Our key messages in framing Commonwealth homelessness legislation are:

- Housing is a basic human right and provides the basis for the enjoyment of other rights. As part of Australia’s response to homelessness the legislation should accord both the right and the administrative structure for people who are homeless to access housing as well as the support to sustain that housing.
- The definition of homelessness used in the legislation should be culturally relevant so as to also cover Aboriginal and Torres Strait Islander homelessness. A culturally relevant description must take into account factors such as the meaning of “country”, kinship ties, obligation and patterns of mobility.
- Asylum seekers experience extreme difficulty in accessing the housing and homelessness support sector and contrary to the principle of “no wrong doors”, are repeatedly encountering wrong doors. Red Cross believes that the homelessness legislation must include a legislative right of eligibility to services for asylum seekers.
- The vision of “The Road Home” to reduce homelessness is grounded in a set of guiding principles that eloquently link tackling homelessness with the Australian Government’s social inclusion framework and its principles. In contextualising the policy of tackling homelessness in the framework of social inclusion the Commonwealth homelessness legislation should outline the guiding principles stated in “The Road Home”.
- “The Road Home” should not be left to become a mere background document to the new Homelessness legislation. To give it continuing effect as a part of the framework for action, it should be expressly referred to in the Preamble to the homelessness legislation.
- A National Commissioner for Ending Homelessness should be established through the homeless legislation. The Commissioner should take a holistic cross jurisdictional view of how Australia is responding to the challenge of ending homelessness.
- The homeless legislation should address the disproportionate impact that public space laws and other regulations have on people who are homeless and particularly on Aboriginal and Torres Strait Islander people who are homeless.
- We applaud “no exits into homelessness” as a cornerstone within the new policy directions and submit that the homelessness legislation should include as a principle that people should not be released or discharged from care into homelessness. In addition there should be a clear message to state and territory governments to review, monitor and resource the correctional, protective care, hospital and other systems they are responsible for to ensure there are housing and supports for people at these points of transition and vulnerability.
- A framework for national service standards and continuous quality improvement which can be regulated through state and territory mechanisms should be established. This will contribute toward high standards of service, ensure a skilled and trained workforce and facilitate the delivery of best practice.

1 Introduction

1.1 Red Cross

Australian Red Cross is part of the world's largest humanitarian organisation with more than 100 million volunteers worldwide in 186 countries. With 60,000 members and volunteers in Australia we reach people and places like nobody else and care for local communities in Australia and Asia Pacific. Relief in times of crisis, be it big or small. care when it's needed most and commitment when others turn away. We are independent of government and have no political, religious or cultural affiliation.

Australian Red Cross was formed in 1914 and is part of the International Red Cross and Red Crescent Movement, the largest humanitarian organisation in the world. The vision of Red Cross is to improve the lives of vulnerable people by mobilising the power of humanity. All services are underpinned by seven Fundamental Principles: Humanity, Impartiality, Neutrality, Independence, Voluntary Service, Unity and Universality.

Australian Red Cross delivers a range of humanitarian programs that focus on the following key priority areas:

- Overcoming social exclusion by providing bridges back into the community
- Addressing Aboriginal and Torres Strait Islander disadvantage
- Addressing the impact of migration
- Tackling entrenched locational disadvantage
- Strengthening disaster and emergency services
- Increasing international aid and development
- Championing International Humanitarian Law

1.2 Scope of this submission

Red Cross aspires for an inclusive society where all people are valued, their differences are respected and their basic needs are met so that they can live with dignity. Red Cross through its programs and initiatives is overcoming social exclusion by building bridges back into the community.

We work with people who are homeless or at risk of homelessness to support and assist them to address the underlying causes of their homelessness, enabling them to access and maintain housing and to enrich their lives. Through Red Cross a range of services are provided to people who are homeless including; early intervention and prevention, youth homelessness programs, asylum seeker and refugee support, programs targeting Aboriginal and Torres Strait Islander people who are homeless, parenting programs and food security initiatives for people who are homeless. The attachment to this submission outlines the homelessness services which Red Cross provides.

This submission is based on Red Cross's experience and relationships with people who are homeless and with communities around Australia. The purpose of making the submission is to contribute perspectives to the development of Commonwealth homelessness legislation. The

submission is not exhaustive, it seeks to express perspectives that are relevant to working with the people that we do and is provided to strengthen the legislation that will be developed.

2 Context

Red Cross commends the Australian Government for the policy directions established in “The Road Home”, particularly:

- Identification of homelessness as a national issue that requires coordinated and sustained action
- A focus on prevention and early intervention along with emphasising the role of mainstream services in ensuring effective responses to reduce homelessness
- Service and policy positions that emphasise “no exits into homelessness” as well as “no wrong doors” when accessing services
- The commitment of substantial additional resources for homelessness support systems and social housing

The prompt attention to developing a legislative framework to embed “The Road Home” policy directions into ongoing systems and to support its implementation is also commended. The drafting of Commonwealth legislation provides an excellent opportunity to ensure systems, regulatory arrangements, supporting mechanisms and clear roles are established and embedded to support the vision of ending homelessness.

3 Addressing the Terms of Reference

3.1 The principles that underpin the provision of services to Australians who are homeless or at risk of homelessness.

3.1.1 Housing as a basic human right

Housing is a basic human right and provides the basis for the enjoyment of other rights. Housing provides safety and security, connection to friends, family and community as well as making it easier to hold down a job and to lead a healthy and stable life¹. Australia is party to international treaties which accord housing as a right, these treaties include the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the Convention on the Rights of the Child (CRC).²

Within these treaties adequate housing is identified as more than just shelter or a roof over your head. Adequate housing is also understood to be characterised by security of tenure, availability to services, affordability, accessibility, being habitable, appropriately located and culturally adequate.³ Sadly, Australia has a significant number of people who do not have adequate housing and are homeless, including rising numbers of families with children. The Commonwealth’s homelessness legislation should recognise the rights of homeless people to adequate housing and as well as the supports to access and maintain it.

¹ “The Road Home”: A National Approach to Reducing Homelessness, p 3

² ICESCR, article 11; CRC, article 27; CERD, article 5(e); CEDAW, article 14(2); UDHR, article 25

³ ICESCR, General Comment 4: The right to adequate housing, [8].

It is critical that the legislation not only recognises the right to adequate housing for people who are homeless but also their right to support. This is because as important as the provision of housing is a significant number of people who are homeless are subject to structural and personal factors which work against them accessing and sustaining a home. As part of Australia's response to homelessness the legislation should accord both the right and the administrative structure for people who are homeless to receive support and assistance from specialist and mainstream services with the aim of facilitating their pathway into adequate housing, addressing issues in their lives that impact on their housing and in supporting them to sustain housing.

3.1.2 Definition of homelessness

The three part cultural definition of homelessness (primary, secondary and tertiary homelessness) originally developed by Chamberlain and McKenzie⁴ is conceptually valuable, useful in distinguishing between the layers of homelessness and also facilitates enumerating the population of people who are homeless. In terms of defining homelessness in the Commonwealth homeless legislation Red Cross submits that the definition of homelessness in the Supported Accommodation Assistance Act 1994 should be retained as it captures the 'spirit' in which we as a nation seek to end homelessness. This definition defines homelessness as "inadequate access to safe and secure housing", and exists when the only housing a person has access to:

- Is likely to damage their health
- Threatens their safety
- Marginalises the person by failing to provide access to adequate personal amenities or the normal economic and social support of a home
- Places the person in circumstances that threaten or adversely affect the adequacy, safety, security and affordability of that housing

Aboriginal and Torres Strait Islander Homelessness

Red Cross also believes that the definition of homelessness should be further developed through the inclusion of a culturally relevant definition of Aboriginal and Torres Strait Islander homelessness. The reason for this is that "Aboriginal and Torres Strait Islander households experience homelessness and live in crowded and sub-standard accommodation at rates much higher than those experienced by non-Aboriginal and Torres Strait Islander Australians"⁵. While there are similarities between Aboriginal and Torres Strait Islander and non-Aboriginal and Torres Strait Islander experiences of homelessness there are also fundamental differences with the causes and contexts of Aboriginal and Torres Strait Islander homelessness. A culturally relevant description of Aboriginal and Torres Strait Islander homelessness must take into account factors such as the meaning of 'country', kinship ties, obligation and patterns of mobility.

⁴ Understanding Contemporary Homeless: Issues of Definition and Meaning

⁵ Sustaining at-risk Aboriginal and Torres Strait Islander tenancies, AHURI Positioning Paper No. 104, p 1

Asylum Seekers

Red Cross also notes the definitional question of who is an Australian raised by the first point in the Inquiry's Term of Reference. This point states that *The Committee shall give particular consideration to the principles that should underpin the provision of services to Australians who are homeless or at risk of homelessness*. This has implications for asylum seekers; that is people who have applied to Australia for protection on refugee grounds and are awaiting determination of their status. Asylum seekers living in the community do so on the basis of Bridging Visas. As people without residency status in Australia Red Cross is concerned to ensure that asylum seekers are defined as eligible for services within the provisions of the homelessness legislation.

Asylum seekers face multiple and serious disadvantage through being unable to access the social safety net provisions of Centrelink, often not having work rights, access to employment or Medicare. Red Cross provides programs to support asylum seekers; our experience is that homelessness and lack of access to safe and affordable housing is a common experience of people. Currently almost 80% of the people case managed by Red Cross through the Asylum Seeker Assistance Scheme are homeless with the vast majority experiencing secondary and tertiary homelessness.

People seeking asylum are lawfully entitled to reside in Australia while having their claims for refuge determined by the Australian Government. Recent reports⁶ have highlighted the difficulty accessing the housing and homelessness support sector that asylum seekers experience and the disastrous impact on their lives as they seek to settle in Australia. The reality is that contrary to the principal of "no wrong doors" outlined in "The Road Home" asylum seekers are finding that there are many wrong doors. Red Cross fervently believes that the Commonwealth homelessness legislation must include a legislative right of eligibility to services for asylum seekers.

3.2 The scope of any legislation with respect to related government initiatives in the areas of social inclusion and rights.

Red Cross strongly endorses "The Road Home" in embedding the objective of tackling homelessness in the framework of social inclusion. It is important that this nexus is maintained and reinforced in the Commonwealth's homelessness legislation. Recognition should be clearly made in the legislation that homelessness keeps people in disadvantage and prevents them from participating fully in Australian life.

The Social Inclusion Principles for Australia provide a strong statement of what we as a nation aspire to. The vision of "The Road Home" to reduce homelessness is grounded in a set of guiding principles that eloquently link tackling homelessness with the social inclusion framework and its principles. In contextualising the policy of tackling homelessness in the framework of

⁶ For instance Locked Out: Position Paper on Homelessness of Asylum Seekers Living in the Community, Asylum Seeker Resource Centre

social inclusion the Commonwealth homelessness legislation should outline the guiding principles stated in "The Road Home"⁷ which are:

1. A national commitment, strong leadership and cooperation from all levels of government and from non-government and business sectors is needed
2. Preventing homelessness is important
3. Social inclusion drives our efforts
4. Clients need to be placed at the centre of service delivery and design
5. The safety and wellbeing of all clients is essential
6. The rights and responsibilities of individuals and families need to be protected
7. Joined-up service delivery needs joined-up policy
8. Transition points are a priority
9. Evidence based policy helps to shape our priorities for action
10. Targets are set to reduce homelessness and hold ourselves accountable

3.3 The role of legislation in improving the quality of services for people who are homeless or at risk of homelessness.

3.3.1 National Commissioner for Ending Homelessness

Red Cross commends the establishment of arrangements to drive and monitor implementation of the new policy directions outlined in "The Road Home" including the Prime Minister's Council on Homelessness and the COAG Reform Council. A joined up response is required if Australia is to make a sustained impact on ending homelessness. One of the issues that needs to be addressed is implementation of a coherent policy across the different state and territory jurisdictions of Australia and implementation across specialist homelessness, social and for profit housing, health, community, philanthropic and religious sectors that provide services to people who are homeless.

Red Cross believes that the role of a National Commissioner for Ending Homelessness should be established within the Commonwealth homeless legislation. The role should be focussed on taking a holistic and comprehensive view of how Australia is responding to the challenge of ending homelessness. The position should be created through the legislation and be independent of government.

The Commissioner's powers role could incorporate:

- Promoting understanding of homelessness within the Australian community
- Monitoring implementation of "The Road Home" policy and the National Partnership Agreement on Homelessness and providing reports to COAG on progress
- Reviewing administration of the Commonwealth homelessness legislation
- Providing advice to relevant Commonwealth Government Ministers
- The scope to undertake independent investigations and make public reports

⁷ "The Road Home", p 20f

The Commissioner should make an annual report to Parliament monitoring the implementation of the homelessness strategy and Australia's response to homelessness.

There may also be a role for the Commissioner in monitoring national homeless service standards as discussed in section 3.5.2.

3.4 The effectiveness of existing legislation and regulations governing homelessness services in Australia and overseas.

3.4.1 Building on the model of the Supported Accommodation Assistance Act 1994

Red Cross strongly supports the response to homelessness, both in policy and activity, to be underpinned by legislation that ensures that people who are homeless are treated with dignity and respect and receive quality services. Hence, as a guide for all other activity to be undertaken within the legislative framework, the legislation giving effect to The Way Home should reflect policy objectives in a clear way and state them expressly.

The Supported Accommodation Assistance Act 1994 (SAA Act) contains a model of a legislative framework, to assist homeless persons, which has many positive features. It adopts a useful structure to emphasise the purposes to be served by the legislation and in that way to guide the interpretation and day-to-day application of the legislation.

Particular features of the SAA Act that should be noted are:

- It includes a detailed Preamble which sets out policy and other considerations taken into account in passing the Act.
- As the SAA Act is legislation providing for financial assistance to the states and territories to administer the Supported Accommodation Assistance Program (SAAP), it sets out a number of objectives of the Parliament and how those aims are to be achieved.
- The SAAP Agreements⁸ are required to reflect the specifically stated objects of the SAA Act through the power of the Commonwealth Minister to specify the form of SAAP agreement between the Commonwealth, the states and the territories. The current SAAP agreement does in fact reiterate the requirements and objects of the SAA Act⁹

This section of our submission focuses on the drafting of the generic provisions of the Commonwealth homelessness legislation. Some suggestions concerning the substantive content of the legislation are dealt with elsewhere in the submission.

Red Cross considers that an approach to the legislative structure which is similar to the SAA Act, but of course with different content, should be adopted.

⁸ See section 5 (4) and Part 2 of the SAA Act

⁹ See for e.g., SAAP V Multilateral Agreement

Specific recommendations

Red Cross recommends that the Commonwealth homelessness legislation should emphasise the commitment of the Parliament to the achievement of the policy objectives of “The Road Home” and to create an express link between the policy, the legislation and the implementation of the legislation.

One way to do this is to include a detailed Preamble in the legislation. A Preamble to an Act can be thought of as providing a legislative mechanism to incorporate the broader policy context in which the specifically stated objects of the legislation are to be achieved and to capture and retain the ‘spirit’ of the policy in legislation. This was done successfully in the SAA Act and that idea can be applied here.

Red Cross submits that:

1. There should be a Preamble to the legislation (as well as the objects of the legislation) and that the Preamble should be drafted to reflect the human rights framework
2. The objects set out in the body of the legislation should be expressed so as to link them to the Preamble
3. The legislation should require the Preamble¹⁰ and the objects¹¹ to be taken into account and given effect in the interpretation and in the implementation of the legislation
4. The legislation should require the Preamble and the objects to be taken into account and given effect in the terms of any agreements between the Commonwealth, States and Territories

In this instance, although the legislation will be of a financial assistance format, to underscore the significance of achieving the objectives of the legislation, Red Cross suggests that the legislation should be drafted not only to include objects which are consistent with the principles espoused in “The Road Home”, but also to expressly require the legislation to be applied and interpreted in accordance with the broader purposes as stated in the Preamble.

In addition “The Road Home”, itself should not be left to become a mere background document to the legislation. To give it continuing effect as a part of the framework for action it is desirable to expressly provide in the legislation, through the content of the Preamble¹², that “The Road Home” is to be taken into account in not only interpreting the legislation but also working out the implementation and application of the legislation.

¹⁰ Under the Acts Interpretation Act 1901 (Cth.) (AI Act), no specific significance is accorded to the words of Preamble of an Act of Parliament. Hence this should be provided for by the legislation itself.

¹¹ The specifically stated objects of an Act are to be taken into account in its interpretation and construction. See also section s 15AA of the AI Act in respect of the purposes of an Act.

¹² Ordinarily, s 15AB of the AI Act provides that material which does not form part of an Act may be referred to in ascertaining the meaning of a provision for the limited purposes set out in that section.

3.4.2 Public space and other laws that disproportionately impact on people who are homeless

In his 2006 report to the United Nations Human Rights Council, the United Nations Special Rapporteur on Adequate Housing¹³, Miloon Kathari, found that Australia had 'failed to implement its legal obligation to progressively realise the human right to adequate housing. The Special Rapporteur specifically identified the following issues:

- Location
- The lack of complaints mechanisms for alleging violations of housing rights
- The existence of laws which criminalise poverty and homelessness, such as laws which prohibit sleeping and drinking in public
- Laws that disproportionately impact on homeless people, such as begging laws, public drinking laws and public space laws.¹⁴

People experiencing homelessness, particularly primary homelessness or rough sleeping, are affected by public space laws which impact on their daily activities including sleeping, drinking and urinating. These activities are not criminal in their own right but attract law and order responses because they occur in public spaces. The outcome of these laws is that people who are homeless are harried by police or other regulatory authorities and may attract fines for summary offences which in turn can lead to people's incarceration if they are not paid, further exacerbating the cycle of exclusion and disadvantage people experience.

In responding to this aspect of the terms of reference Red Cross is particularly informed by the experience of Aboriginal and Torres Strait Islander people. Aboriginal and Torres Strait Islander people become rough sleepers at rates significantly exceeding that of the general population and by virtue of household overcrowding also tend to use public spaces in ways which are different to non-Aboriginal and Torres Strait Islander people. The public space and public drinking laws therefore have a particularly pointed impact on Aboriginal and Torres Strait Islander people who are homeless.

"The Road Home" is correct in focussing attention on addressing rough sleeping. The legislative framework, including the Homelessness Legislation, should address the disproportionate impact that public space laws and other regulations and by laws impact on people who are homeless and particularly Aboriginal and Torres Strait Islander people who are homeless. The challenge is to turn the encounters that occur in public spaces between people who are homeless and law and order agencies into opportunities to address the underlying causes of people's marginalisation rather than into further experiences of social exclusion.

3.4.3 Intervening in the Private Rental Market

Many people caught up in cycles of homelessness or who are at risk of homelessness live in private rental housing for some period, both short term and long term. In many instances the

¹³ Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living 2006 Miloon Kothari United Nations Human Rights Council

¹⁴ Human Rights and Equal Opportunity Commission (2008) *Homelessness is a Human Rights issue*

Commonwealth Government is subsidising these tenancies through the Rental Assistance Scheme while negative gearing and taxation law also may provide financial benefits to private rental landlords.

Unfortunately the experience of the people that we work with is that the private rental market may exacerbate rather than prevent people experiencing homelessness. In the first instance this occurs due to difficulty accessing private rental housing. People on low incomes, people with backgrounds of homelessness, asylum seekers and refugees and Aboriginal and Torres Strait Islander people are discriminated against in terms of being approved for housing relative to the general population. Further where they can access private rental housing it is often of a poor quality and not acceptable to other people in the community who may be seeking rental housing.

In addition once people are housed in the private rental market there are practices that perpetuate homelessness including the situations in which “without-grounds” tenancy terminations can be undertaken, rental arrears management practices and rental default databases that are inadequately managed and are not subject to scrutiny.

Red Cross notes that residential tenancy law is the jurisdiction of state and territory governments and that there is great disparity across the jurisdictions about how tenancy legislation is framed, what it applies to and the impact it has on homelessness. Red Cross recognises there are significant limitations on what the Commonwealth can achieve with the legislative framework in relation to residential tenancy laws and practices. We recommend that the Commonwealth homelessness legislation identify the principle that state and territory residential tenancy legislation should uphold the “highest common denominators” from residential tenancy law around Australia that will protect against homelessness. Areas for specific attention include:

- Security of tenure; residential tenancy legislation should include ‘just cause’ eviction clauses which protect private renters and boarding house residents from punitive or unreasonable evictions if tenants have otherwise met their obligations.
- Standards of rental housing; as outlined above the Commonwealth effectively subsidises the private rental market through the provision of tax incentives and rent assistance however much of the lower private rental housing stock is of a sub-standard condition or unsafe. Residential tenancy legislation or other relevant legislation should prescribe minimum standards.
- Strategies to regulate the use of tenancy databases should be implemented and focus on the databases being open to scrutiny, the capacity for inaccurate information can be corrected and time limits apply to how long someone is listed.

3.5 The applicability of existing legislative and regulatory models used in other community service systems, such as disability services, aged care and child care, to the homelessness sector.

3.5.1 No Exits into Homelessness

Red Cross applauds “no exits into homelessness” as a cornerstone within the new policy directions. Further, Red Cross believes that legislation and the supporting regulatory

environment of governments and government instrumentalities must align with the intention of not having people become homeless as a consequence of release or discharge from care or correctional facilities.

“The Road Home” identifies that pathways into homelessness for young people leaving the care or child protection systems, people released from prison and people leaving mental health facilities and general hospital settings are too easily taken. Red Cross also believes that asylum seekers should be identified within the understanding of not exiting into homelessness. Asylum seekers are by definition new or recent arrivals subject to the refugee determination process, and may also be subject to immigration detention including community detention arrangements.

As new entrants to Australia generally people are seeking to establish themselves in a significantly different culture, may well be dealing with issues around trauma, torture and loss of family and are likely to be disadvantaged in accessing employment and housing. Private rental housing is difficult to access for asylum seekers as they have no or limited incomes, do not have an Australian rental history or references from previous landlords, lack knowledge of the rental market and there is a lack of security around their status to continue to stay in Australia.

Another aspect to “no exits into homelessness” is the complexity in implementing it given that the settings involved; jails, hospitals, youth detention centres, child protection systems and so on, are primarily the responsibility of state and territory governments. Red Cross believes that the Commonwealth homelessness legislation should include as a principle that people should not be released or discharged from care into homelessness. In addition there should be a clear message to state and territory governments to review, monitor and resource the systems they are responsible for to ensure there are housing and supports for people at these points of transition and vulnerability.

3.5.2 National standards

“The Road Home” commits to developing national homelessness service standards and a system for accrediting services focused on improving quality. Red Cross supports the establishment of standards and a framework for continuous quality improvement. This will contribute towards high standards of service, ensure a skilled and trained workforce and facilitate the delivery of best practice.

Red Cross believes that accreditation and service standards should be developed at a national level rather than having different standards applying across state and territory jurisdictions. This pattern of differential standards is already evidenced as some states and territories have implemented registration and service standard processes. Commonwealth legislation should establish national service standards which can be regulated through state and territory mechanisms.

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