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## Safe Places Emergency Accommodation Program – Inclusion Round

Thank you for the opportunity to provide feedback on the Inclusion Round to help inform its design. Thank you also for the invitation to attend face-to-face consultation opportunities. I look forward to attending the workshop in Melbourne later in the month.

### Who we are

WESNET is Australia's national peak body for specialist women's domestic and family violence services, with almost 350 eligible members across Australia. WESNET represents a range of organisations and individuals including women's refuges, shelters, safe houses, and information/referral services.

Domestic violence is the main reason why people ask for help from specialist homelessness services, with almost 40 per cent of people seeking help from specialist homelessness services having experienced domestic and family violence.<sup>1</sup>

*"The impact of the housing crisis continues to be a major issue with the average length of stay for women and children in refuges doubling due to a lack of exit options, and women unable to leave partners who use violence due to lack of refuge space and other affordable housing options."<sup>2</sup> - WESNET member*

WESNET advocates strongly to governments for the creation of safe, affordable and accessible housing options. In this context, the Australian Government's allocation of \$100 million over 5 years to the Safe Places Emergency Accommodation Inclusion Round is welcome.

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<sup>1</sup> AIHW [Specialist homelessness services annual report 2021–22](#).

<sup>2</sup> WESNET, [Annual Report 2021-22](#), p. 17.

## Key concerns

### Operational funding

We understand that the Inclusion Round funding still fails to provide for operational and service provision costs, and is focussed on capital works only. This provides little comfort to the specialist domestic and family violence (DFV) services sector who – already under-resourced – will need to provide the wrap-around support and property maintenance. There is little, if any, spare capacity in most services to provide additional crisis accommodation without extra operational funding.

This model favours large organisations over smaller specialist agencies, and compromises client safety. Many of the DFV specialist services that provide the most effective support to First Nations women, migrant and refugee women and women with disabilities are small and embedded with the communities they serve.

This model also compels services to seek payment from clients/residents who are amongst the most financially vulnerable, exacerbating economic stress, and potentially discouraging victim-survivors from escaping violence and seeking safety. We are told by one of our members that the funding model for a large housing/homelessness agency is to charge rent spread over thirty years to recoup associated costs including property maintenance. As well as being onerous on victim-survivors, this renders the 15 year designated use period insufficient.

***It is critical that the Australian Government work directly with State Governments to ensure that operational funding is provided to grant recipients.***

### Specialist services

The restriction of eligibility to specialist family violence services, capable of providing appropriate family violence services, is strongly supported. It is, however, equally essential that services tasked with delivering services to victim-survivors who are First Nations, migrant and refugee families and/or with a disability, must be able to deliver in culturally-safe, accessible and trauma-informed ways. We consider that grant recipients must be able to provide evidence of their capability in this regard, and that preferential treatment should be afforded to those services who have an established track record in delivering targeted and specialised DFV services for these cohorts. It is not reasonable to expect services to specialise across all identified groups - as mentioned above many of the services that provide the best support are small with a local community focus.

## Discussion paper responses

WESNET asked representative members to respond to the questions posed in the discussion paper. The following dot points represent those responses.

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

- This will depend on the proposal submission and what this includes.
- For Commonwealth cost-effectiveness, all proposals should be seeking a “greener” build that considers disaster preparedness and environmental sustainability.
- Overall funding is insufficient. Average cost for build of the NSW core and cluster refuges, for example, is \$7 million.

*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?*

- This should be considered per application and the merits of the proposal itself and what the short-term project entails.
- Longer-term housing should provide evidence of sustainability to safeguard women and children from displacement and unsafe/unplanned exits.

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

- Flexibility/reasonable adjustment with funding agreements may be required pending project location, related construction costs/time frames.
- Confirmation of DFV wrap-around service should be a requirement at the signing of a grant agreement to ensure this support is in place and active at time of project completion.
- Concern is noted that a completed project and opportunity for women and children to access emergency accommodation and support may be delayed by further negotiations and activation or expansion of a DFV service.
- There are concerns more generally about competitive tendering and how successfully it can build upon a needs analysis of current service delivery/availability, rates of DFV and access needs of people from the key priority cohorts.

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

- Community-based DFV services will require additional time, noting relevant approvals and partnerships are complex in contexts of increasing requests for service supports, and existing constraints on service capacity where there may be limited staffing options available to support a proposal, and where outsourcing may be needed.

- Community-based specialist DFV services are well positioned to provide emergency accommodation in terms of expertise and community relationships, however, may not be able to compete against applications from entities with significant capital works experience and resourcing.

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

- Additional support to develop a high quality competitive proposal is beneficial. This provides an equitable opportunity for applicants representing identified priority focus groups (First Nations, CALD, Disability) and who may be located in areas with high unmet demand for emergency accommodation to submit a quality proposal.
- Suggested support includes dedicated proposal officers/staffing to provide information, partnership pathways, guidance and feedback for applicants without in house capital works and funding application expertise.
- High quality proposals responding to the emergency accommodation needs of women and children identifying as First Nations, CALD and/or with disability should include, at the least, evidence of consultation and partnership with appropriate community groups/agencies and specialist DFV services – supporting applicants to access relevant stakeholders would be positive.
- Options to support applicants with co-investment opportunities would also support partnerships with specialist DFV agencies, noting these partnerships would demonstrate access to ongoing appropriate supports for women and children.

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

- The Selection Advisory Panel should comprise appropriate representation across the identified priority groups (First Nations, CALD, Disability), experts by experience of DFV and specialist domestic and family violence staff. This is in addition to relevant representatives in construction and building – in this case consideration of environmentally sustainable building design expertise would be significant in also supporting wider implications of longer-term climate impacts on the environment (e.g. renewable energy options, water efficiency) and in areas identified with increasing risks of extreme weather events (floods, bushfire, cyclones etc.).
- Requirement of evidence relating to compliance with the *National Principles for Child Safe Organisations* is supported.
- In relation to proximity to infrastructure, rural and remote community locations may not have existing public transport networks/other established infrastructure, which may impact application success. The role of cultural and community advisors in the application process would be significant.
- All applicants should be compliant with relevant state/territory quality standards and DFV guidelines/or Codes of Practice, noting that not all states/territories have

guidelines/codes of practice but should, at a minimum, meet the [AWAVA Good Practice Principles in Addressing Sexual and Gender-Based Violence](#).<sup>3</sup>

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

- This requires evidence of direct input and co-design from relevant First Nations community members.
- Evidence of how the applicant can support pathways to stable long-term housing, recognising First Nations housing tenure is disproportionately lower than non-Indigenous community members and that First Nations peoples are significantly more likely to be social renters.
- Evidence that emergency accommodation location has considered First Nations population and whether this is concentrated in a discrete location or within a larger community.
- Evidence of strength in community partnerships and relationships (service integration) and connection to services working with First Nations peoples.
- Consideration of kinship rules and potential conflicts of interest within smaller communities.

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

- The department's attention is drawn to the [Blueprint for Reform: Removing Barriers to Safety for Victims/Survivors of Domestic and Family Violence Who Are on Temporary Visas](#).
- Evidence of direct input from relevant CALD community members is required. Complexity presents in relation to experiences of migration journey, trauma and refugee lived experience, and navigating/understanding Australian systems and processes.
- Evidence of the ability to support women and children experiencing immigration-related abuse is critical – this is a nuanced form of coercive control.
- Evidence of ability to provide appropriate interpreting and translation supports, including access to bicultural, bilingual and multilingual workers – noting consideration of how interpreter access and risk of information transmission can be mitigated in smaller community locations and /or where the CALD clients are from a smaller population in Australia.

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<sup>3</sup> AWAVA. (2020). Good Practice Principles in Addressing Sexual and Gender-Based Violence. Australian Women Against Violence Alliance.

- Emergency accommodation eligibility that is not assessed on income support eligibility/residency status. Many women and children on temporary visas are ineligible for income support/payments and as a result, ineligible for refuges.
- Response from applicants on how they will support CALD women and children with visa requirements relating to study/work commitments and ensure this is not a barrier to accessing emergency accommodation.
- Evidence of applicant ability to demonstrate clear support pathways to specialist migration legal advice.
- Evidence of how CALD women and children without permanent residency can be supported into longer-term housing. CALD women and children may require a longer period of emergency accommodation support due to their residency status and resulting structural impacts.
- Applicant commitment that CALD women and children may require flexibility in time frames for accommodation access to respond to systemic barriers and support a safe exit option that does not create further risk of returning to a violent perpetrator due to a lack of ongoing accommodation / access to support services.

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

- Evidence of direct consultation, co-design with women with disability.
- Partnership agreement with agencies providing specialist disability support and advocacy for women and children with disability.
- Applicant statement/commitment /evidence that women and children with disability may also require extended emergency accommodation support, and that this may extend into longer-term housing options requiring ongoing support and access to appropriate care.
- Evidence of how women and children with disability can be appropriately accommodated in areas where access to care providers may be limited.

*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?*

- For disability – gold level in relation to vertical clearance over a parking space and pathway widths, all internal widths wider to accommodate mobility needs, shower spaces and rooms to support mobility and access by other care providers.
- Wider pathways and internal areas extends to any women with prams, and supports general ability to move furniture and items to accommodate additional visitors such as case workers/services who may require access.

- All require a level entrance to support safety (entrance and exit) and ability to also add measures such as security upgrades.
- First Nations – consideration, notably in relation to longer-term options that are culturally appropriate and provide open spaces, options for outdoor cooking, space to accommodate additional visitors during special/significant events (e.g. consideration of storage spaces for food).
- First Nations – emergency accommodation – consideration of the above elements-noting for short-term, that there be privacy to support any cultural kinship rules, recognition of understandings about possessions/ownership of items.

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

- Further information is requested regarding the 15 year period of designated use.
- It is too short.

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

- Evidence of client support that is evidence-based, trauma-informed and aligned with relevant DFV best practice frameworks including risk and safety planning.
- Appropriately qualified staff and compliance with regulatory frameworks including DFV Codes of Practice/Guidelines and relevant quality standards. .
- Information relating to contingency planning and response if the partnering DFV service is no longer funded/ceases operation.

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

- The definition of emergency accommodation is supported in principle noting that “custom approaches” are critical in responding to individual/family needs. Further consideration of the intersection between domestic and family violence emergency accommodation needs and the availability of long-term housing options that will support ongoing healing and safety after exit from short-term accommodation support is needed.
- Limiting the duration to 12 months may also be problematic. The initial twelve-month period after leaving domestic and family violence can present as a very difficult time for women and children. Women and children experience significant adverse impacts to their health and wellbeing, including disruption to community, intra-familial and social networks, financial/economic instability, food and housing insecurity and complex interactions with systems and services. This is in addition to overarching healing and recovery needs and the life story of women and children. With a current housing crisis nationally, twelve months is a short time frame for women and children to effectively re-establish and rebuild their lives.

- The definition of “Safe place”, would benefit from flexibility with the measure of overcrowding accepted by the AIHW, noting that current barriers to emergency accommodation exist for women requiring emergency accommodation for multiple children.
- “Safe Place” should include recognition of factors acknowledging that women and children with disability, who are First Nations or CALD have specific understandings about what a ‘safe place’ may mean which is outside acculturated anglo-Australian perceptions – yarning spaces, mobility priorities, interpreter access, prayer rooms – ensuring culture and ways of being are valued.

*Should the definition of ‘emergency accommodation’ include longer stays?*

- Yes – this recognises the intersection and impacts of trauma and that ‘longer stays’ may best support women and children in the longer-term, notably in wider contexts of increasing housing unaffordability and unavailability nation-wide.
- Healing and recovery following domestic and family violence is complex and adversely impacted by frameworks of response that are short-term and has now been recognised as a priority area in the Second National Plan.
- Women and children routinely identify that the initial period after leaving violence (e.g. up to, and beyond the first year) is extremely difficult and can result in a return to the person using violence due to financial distress and housing precarity, compounding further trauma and risks to wellbeing and safety.
- Longer stays supports an understanding that “emergency” continues well after women and children leave violence, and facilitates system supports that can assist with safety, healing and stability in the longer-term.

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

- Cultural community housing options that create shared gathering spaces and support cultural practices.

*Signed*



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*WESNET acknowledges and pays respects to the Traditional Owners and Custodians of all the lands on which we live and work.*