

## Yfoundations submission to Senate Economics Legislation Committee on the 'National Housing and Homelessness Plan Bill 2024 (No. 2)'

Hey, can I stay at your place tonight?

Can't tonight sorry. Can you go somewhere else?

*Mike will want something in return if I sleep on his couch...*

*It's not safe for me at home...*

*There's no bed at the youth refuge for me...*

No worries, I'll figure something out.



# Role of Yfoundations

Yfoundations is the peak body for youth homelessness in NSW. For over 40 years, Yfoundations has served as the NSW peak body representing and advocating for children and young people at risk of and experiencing homelessness, and the services that support them. Our members and board comprise highly experienced youth specialist homelessness service (SHS) providers who have direct knowledge of and experience with the issues homeless young people face.

Yfoundations is one of only two peak bodies that specialise in child and youth homelessness in Australia. At the National level, in April each year we lead the *Youth Homelessness Matters Day* campaign. An ongoing focus of the campaign is to call on the Australian Government to lead the development of a standalone National Child and Youth Homelessness Plan.



**foundations**  
creating a future without youth homelessness

## Care First, Housing Second

Stop thinking what works for adults will be effective for all unaccompanied children and young people.

# EXECUTIVE SUMMARY

Yfoundations strongly supports the intent of the 'National Housing and Homelessness Plan Bill 2024' to recognise access to adequate housing as a fundamental human right and to legislate a requirement that the Australian Government develops, implements and maintains a National Housing and Homelessness Plan.

In recognition that homelessness, particularly child and youth homeless, represents a violation of a wider set of fundamental rights than the right to adequate housing alone, and that the solution to child and youth homelessness requires a focus on a broader range of systemic issues, we recommend a broader scope of focus for the proposed Act than is included in the Bill as currently drafted.

Yfoundations made comprehensive submissions to inform the Government's current development of its National Plan. In highlighting the evidence of the alarming and ongoing prevalence of child and youth homelessness in Australia and the failure of successive governments at the National and State levels to end this insidious problem, two core tenets of our submission to the Government were that:

- ending child and youth homelessness looks different to ending adult homelessness or solving the housing crisis; and
- whilst a Housing First model, where allocating housing is the first response combined with wrap around supports, is a very effective adult homelessness response, it is not always the right response for young people.

To prevent the adultification of children and young people at risk of and experiencing homelessness, to recognise that this cohort's pathways into and out of homelessness are different to those of adults, and to contribute to a future without child and youth homelessness in Australia, Yfoundations calls for a standalone National Child and Youth Homelessness and Housing Plan.

Despite the Australian Government's investments into housing infrastructure and its commitment of funding under the National Agreement on Social Housing and Homelessness, there is no clarity as to when the National Housing and Homelessness Plan, which should be guiding the effective and efficient use of these investments, will be finalised. Furthermore, despite the clear evidence of the need, to date there has been no indication that the Government intends to develop and implement a standalone National Child and Youth Homelessness and Housing Plan. Without such a Plan the Australian community is left with no assurance of a commitment to end child and youth homelessness in this country.

Legislating the requirement that the Australian Government exercises leadership in the fight against child and youth homelessness is an important contribution that the parliament can make to civil society. Yfoundations commends this Bill to the Senate Economics Legislation Committee with the following recommended enhancements.

## **Recommendation 1**

That the objects of the Act include reference to the broader range of fundamental human rights that are violated when a child or young person is at risk of or experiencing homelessness, including the rights to health, personal safety, education, work, non-discrimination and social security.

## **Recommendation 2**

That the objects of the Act further progress realisation of the broader range of human rights violated when a child or young person experiences homelessness as well as compliance with relevant international commitments, including the Convention on the Rights of the Child.

## **Recommendation 3**

That Part 2 of the Act requires that the Minister prepare a National Child and Youth Homelessness and Housing Plan in addition to the National Housing and Homelessness Plan.

## **Recommendation 4**

That all references to the National Housing and Homelessness Plan in Part 2 of the Act also refer to the 'National Child and Youth Homelessness and Housing Plan'.

## **Recommendation 5**

That Part 8 of the Act 'Content of National Housing and Homelessness Plan' be expanded to include the National Child and Youth Homelessness and Housing Plan and a focus on connections with the broader service systems relevant to addressing homelessness including, but not limited to, health and mental health, personal safety/child protection, education and employment, exiting care institutions and social security.

## **Recommendation 6**

That the National Housing Consumer Council be renamed the National Housing and Homelessness Consumer Council so as to reflect a broader remit than on housing issues alone.

## **Recommendation 7**

That a separate National Child and Youth Housing and Homelessness Consumer Council be established.

## **Recommendation 8**

That all references to the National Housing and Homeless Consumer Council and its operations at Part 3 of the Act also refer to the National Child and Youth Housing and Homelessness Consumer Council.

## **Recommendation 9**

That the membership and function of both Councils be expanded to advise the Minister from the perspective of consumers in the broader range of service systems relevant to addressing homelessness, not just the housing system.

## **Recommendation 10**

That consideration be given to establishing a separate National Child and Youth Housing and Homelessness Advocate or a senior role within the Office of the National Housing and Homelessness Advocate to monitor implementation of the National Child and Youth Homelessness and Housing Plan.

## **Recommendation 11**

That the Functions of the Advocate/s at Section 33 of the Act be expanded to include the conduct of reviews into the broader range of systemic issues impacting on homelessness, rather than being focused on systemic housing issues alone.

## **Recommendation 12**

That all references to reviews of 'systemic housing issues' at Division 3 of the Act be updated to refer to 'systemic housing and homelessness issues'.

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# 1. Introduction

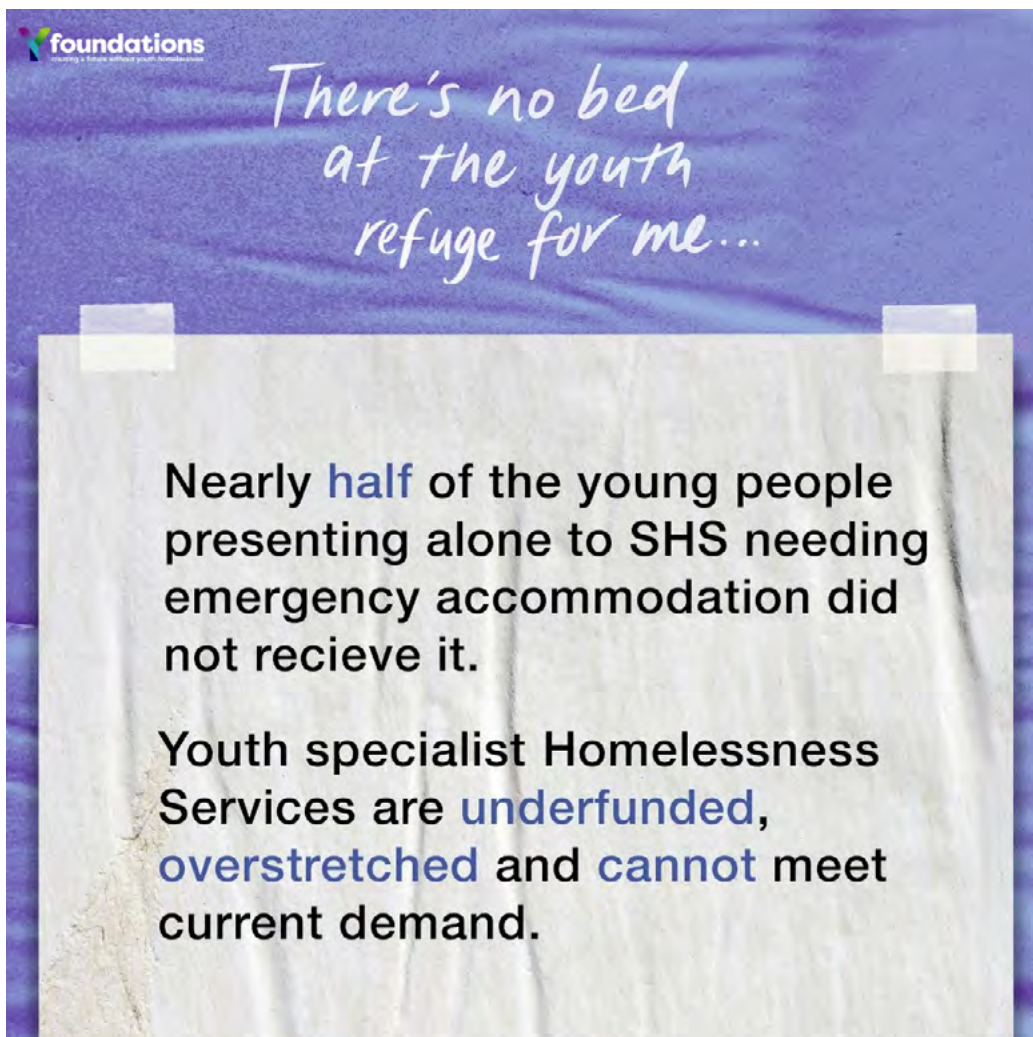
## 1.1 The prevalence of child and youth homelessness in Australia

The prevalence of child and youth homelessness in Australia remains unacceptably high.

Of the 122,494 people experiencing homelessness on Census night in 2021, 38% were under 24 years of age and 23% were aged 12-24 years. The number of young people identifying as homeless increased by 2,500 between the 2016 and 2021 Census.

Across Australia in 2022/23 around 38,300 children and young people aged 15 – 24 years presented on their own to a specialist homelessness service, representing 14% of the total population group that sought assistance that year.<sup>1</sup> Nearly half of the children and young people presenting alone to a Specialist Homelessness Service needing crisis accommodation did not receive it in 2021-22.<sup>2</sup> They are being turned away because youth Specialist Homelessness Services are underfunded and overstretched and there is not an adequate supply of appropriate accommodation immediately available to respond.

Due to a range of limitations in the current data collection mechanisms, the level of child and youth homeless is under-represented by the statistics. It is generally recognised that Census estimates are likely to under-represent the extent of youth homelessness, as some couch surfers report their usual address as the place they are staying that night. There is a disjunct in the definitions and age groupings in key data sets including the ABS Census and AIHW Specialist Homelessness Services data collections that diminishes the capacity of the combined data set to measure child and youth homelessness in its totality.



<sup>1</sup> Australian Institute of Health and Welfare (AIHW) (Feb 2024), *Homelessness and homelessness services*

<sup>2</sup> AIHW (2022)

## 1.2 Long-term recognition has not turned the tide

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The problem of child and youth homelessness, and the need for specialised responses has been recognised for well over three decades.

In 1989 the Human Rights and Equal Opportunity Commission (HREOC) released its 'Our Homeless Children' Report following a comprehensive Inquiry led by Commissioner Brian Burdekin. The Inquiry, which found that Australian children were being denied their fundamental rights under the UN Declaration of the Rights of the Child, including the right to receive adequate housing, made a broad range of recommendations to address child and youth homelessness.

In a keynote speech at the National Children and Youth Homelessness Conference 2023, Professor Burdekin gave a forensic account of missed opportunities, ignored reports and other failures to significantly improve the lives of the some of the most vulnerable members of society, adding, "many issues that we identified three decades ago .... are now not being addressed".

Almost 10 years after the HREOC Report, the National Youth Commission released its report 'Australia's Homeless Youth' in April 2008, following a comprehensive inquiry informed by 21 public hearings and 91 written submissions.

The report identified a roadmap of 10 'must do' strategic actions areas, the first being to 'Develop and implement a National Framework and National Homelessness Action Plan' which would include a 'national aspirational horizon – the goal of eliminating youth homelessness by 2030' and a 'youth centred focus for service provision and programs'.

Despite the comprehensively documented need and ongoing calls for national leadership to properly respond to child and youth homeless, including development and implementation of a national plan, Australia continues to move further away from achieving the aspiration of eliminating youth homelessness.

## 1.3 Child and youth homelessness is unacceptable to the vast majority of Australians

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In the lead up to Youth Homelessness Matters week in April 2024, Yfoundations commissioned a national poll by Essential Media which found that across Australia and all age groups, 80% of people agree that child and youth homelessness is unacceptable and that all levels of government must do more to tackle the issue.<sup>3</sup>

In late July 2024 the national youth housing campaign 'Home Time' released a YouGov poll showing that 9 in 10 Australians want the Federal Government to make housing for unaccompanied children with nowhere to live a national priority and that 91% of Australians are concerned at the high number of unaccompanied children experiencing homelessness.<sup>4</sup>

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<sup>3</sup> [https://www.yfoundations.org.au/8\\_in\\_10\\_believe\\_no\\_child\\_or\\_young\\_person\\_should\\_be\\_homeless\\_in\\_au](https://www.yfoundations.org.au/8_in_10_believe_no_child_or_young_person_should_be_homeless_in_au)

<sup>4</sup> [National poll reveals 9 in 10 Australians want the Federal Government to make housing for homeless children a national priority - News Hub \(medianet.com.au\)](https://www.medianet.com.au/news/national-poll-reveals-9-in-10-australians-want-the-federal-government-to-make-housing-for-homeless-children-a-national-priority)

## 1.4 More than the right to adequate housing is breached when a child or young person is at risk of, or experiencing homelessness

Whilst access to safe and secure housing is one of the most basic human rights, homelessness, especially for children and young people, is not just about housing.

A child or young person who is homeless will likely be facing violation of a broad range of human rights that are protected by international human rights treaties including the International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights and the Convention of the Rights of the Child. These include the right to an adequate standard of living, the right to the highest possible standard of health, the right to liberty and security of the person, the right to education, the right to privacy, the right to social security, the right to freedom from discrimination, and many more.

As noted by the Human Rights and Equal Opportunity Commission, "A human rights approach acknowledges that homelessness is more than just a housing issue. Addressing homelessness requires a comprehensive and integrated approach that takes into account its many and varied causes and effects. A human rights approach to homelessness would involve all levels of government committing to and taking concrete targeted legislative, policy and budgetary steps towards the full and immediate realisation of the human rights of homeless people".<sup>5</sup>



<sup>5</sup> HREOC (2008) *Homelessness is a Human Rights Issue*



## 1.5 The current national policy context is inadequate

Supported by academics and practitioners alike in the child and youth homelessness sphere and informed by the statistics and the history of policy failure, Yfoundations has long called for a standalone National Child and Youth Homelessness and Housing Plan as a fundamental pre-requisite to ending child and youth homelessness in Australia. Consistent with this position we provided comprehensive submissions in response to the Federal Government's National Housing & Homelessness Plan Issues Paper, detailing why the development and implementation of a standalone child and youth plan is necessary and what the scope and core components of that plan should be.

As part of the Youth Homelessness Matters campaign in April 2024 almost 11,000 people signed a petition calling on the Australian Government to develop a standalone National Child and Youth Homelessness and Housing Plan.

Distressingly, despite the clear need and community expectation, children were not mentioned at all in the Government's Summary Report: Consultations on the *National Housing and Homelessness Plan*. Young people were only mentioned in relation to Foyers (which are an important service model) and rental subsidies.

Other national plans where there is scope for action that could have a positive impact, also fail to recognise and address the issues faced by unaccompanied children and young people who are at risk of and experiencing homelessness. The Australian Government heralded the National Plan to End Violence Against Women and Children 2022-2032 as a key mechanism to end gendered violence in one generation. However, on reading the document, it is clear there is a massive gap in responses for unaccompanied children and young people. Page 40 provides an infographic where the absence of young women is stark. It also appears that the government rushed the inclusion of 'children and young people in their own right' into the plan given there is no context or nuance in the narrative about this cohort. A child or young person seeking a service because of domestic and family violence (DFV) needs a different response because of their age, experience and vulnerability than an older woman seeking a service with her children for the same reason. In addition, there are barriers for young women accessing DFV crisis accommodation and services, the main one being that their age makes them ineligible for the service.

The omission of any substantial recognition of the unacceptable nature of child and youth homelessness in Australia, or commitment to targeting effort towards this often forgotten, yet very significant, cohort of the homeless population is a serious policy failure. It raises serious concern about the potential for the pending National Housing & Homelessness Plan to have any meaningful impact for children and young people at risk of and experiencing homelessness and highlights the requirements of a standalone Child and Youth Homelessness and Housing Plan to have a legislated basis with independent oversight.



## 2. Child and youth homelessness is complex, is different to adult homelessness and requires a different response – the case for a standalone Child and Youth Homelessness and Housing Plan



### 2.1 The drivers of youth homelessness in Australia

Like adult homelessness, the drivers of child and youth homelessness are complex, often involve failures in multiple service systems and safety nets and a 'falling through the gaps' that exist between those systems. Many of the drivers of child and youth homelessness are, however, specific, or have characteristics that are specific, to the cohort.

The failures of government policies see children and young people all too often end up in the youth homelessness service system – a system that has neither been designed nor resourced to respond to these failures. Often the failures of the service system responsible for keeping children and young people safely housed are the reason why they seek homelessness support. These systems fail children and young people who are impacted by child abuse and neglect, domestic and family violence, poverty and poor exits from child protection/Out-of-Home Care and youth justice. Too often the children and young people impacted are ending up in the youth homelessness service system.

This results in children and young people becoming trapped in the system with no clear pathways out of homelessness based on their individual circumstances. They become 'stuck' and identified as homeless when there are other issues of equal concern such as mental health, violence, abuse, neglect, education problems or the need for family mediation.

The following diagram summarises how the current service system fails or lacks resources to respond to unaccompanied children and young people.

## Gaps in the current service system that put unaccompanied children and young people at risk and cause homelessness





## 2.1.1 Child protection and Out of Home Care (OOHC)

Despite there being broad legislation across Australia for the States to provide temporary or long-term care for children at risk of harm, children's experiences of unaccompanied homelessness often may not, in practice, meet the high threshold to trigger child protection involvement. Most often, these children have experienced significant trauma and neglect, and end up in the youth homelessness service system.

Many children leave a home where they are unsafe but do not meet the practiced (as opposed to legislative) threshold for child protection involvement. These children usually couch surf with extended family, friends and acquaintances, or access youth homelessness services. They may also sleep rough. According to Dr Catherine Robinson, University of Tasmania, 'These children consistently go to homelessness services because they're easier to access than child protections services'.<sup>6</sup>

The consequence of this is that children who experience significant trauma and neglect and do not receive a child protection response are instead receiving a 'youth homelessness response' from a service system that is overstretched and 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 longer-term. As such, children flounder in this system and the issues they face are often entrenched and made more complex.<sup>7</sup>



<sup>6</sup> Robinson C (2023) Yes, we see you. Why a national plan for homelessness must make thousands of children on their own a priority, The Conversation.

<sup>7</sup> Ibid

## 2.1.2 Exits from youth justice

The relationship between young people experiencing homelessness and incarceration is bi-directional; homelessness can increase the risk of incarceration, and incarceration can increase the risk of homelessness.<sup>8</sup> This relationship is due to intersectional risk factors, namely experience with DFV, mental ill-health, alcohol and other drug use, and negative peer associations. Any experience with these risk factors can increase a young person's likelihood of both experiencing homelessness and incarceration. Young people exiting youth justice settings are vulnerable to cycles of homelessness and detention. In 2021-22, 1,530 children and young people aged 10 – 23 exiting custodial arrangements received support from Specialist Homelessness Services. Young people are more likely to experience homelessness upon leaving youth justice settings due to difficulty securing accommodation, and loss of family and/or social supports.

## 2.1.3 Inadequate support payments

Currently, the primary statutory income payment for young people, Youth Allowance, is just around \$45 a day or \$319.50 per week.<sup>9</sup> Even with the recent increase for eligible recipients, Youth Allowance combined with the Commonwealth Rent Assistance payment has not lifted to keep pace with the increasing cost of private rental properties. In the 2021 Census, over 131,000 young people aged 34 and under received Commonwealth Rental Assistance, and 60.2% of them were still under rental stress. Even where a young person on Youth Allowance is eligible for the maximum rate of Rent Assistance of \$94.10 per week<sup>10</sup>, their total weekly income of \$413.60 combined with Youth Allowance, places them well below the poverty line of \$496.62 per week<sup>11</sup>.

## 2.1.4 Domestic and family violence

As is the case for the adult homeless population, domestic and family violence (DFV) is a major driver of child and youth homelessness. Of the 38,300 children and young people aged 15-24 years who presented alone to a Specialist Homelessness Service in 2022-23, 34% had experienced domestic and family violence.<sup>12</sup>

However, the data doesn't tell the full story. In NSW, for example, youth Specialist Homelessness Services have reported to Yfoundations that 80-90% of young people entering their services have experienced or are escaping DFV. Melbourne City Mission in Victoria has also reported that almost every single child and young person presenting to their refuges had experienced DFV in some way.

The exposure of children and young people to DFV is often seen as their experience witnessing violence from a male to a female parent. However, young people experiencing DFV 'in their own right' as victim survivors is often invisible to the DFV service system and the available support and responses. The impact of the trauma of these experiences can result in violent behaviour and responses from young people that can also go unrecognised.<sup>13</sup>

Children and young people who have experienced DFV are also not likely to seek out specifically funded DFV services. This is attributed to the lack of age appropriate services, not knowing about the adult services available, not being eligible for the adult services, and fear of the consequences and potential involvement of child protection services.<sup>14</sup> This results in children and young people staying with friends – i.e. couch surfing – to avoid conflict at home or presenting to a Specialist Homelessness Service reporting a range of issues, such as mental health, as opposed to DFV.

<sup>8</sup> MacKenzie D, Flatau P, Steen A and Thielking M (2016). *The cost of youth homelessness in Australia* – research briefing, Australia Policy Online

<sup>9</sup> Rate from 1 January 2024 for a single young person (no children) living away from home

<sup>10</sup> Paying \$396.94 rent per fortnight

<sup>11</sup> Melbourne Institute: Applied Economics and Social Research, *Poverty Lines: Australia March Quarter 2024*.

<sup>12</sup> AIHW (2024)

<sup>13</sup> Corrie T and Moore S (2021), *Amplify: Turning up the volume on young people and family violence*, Research Report, Melbourne City Mission.

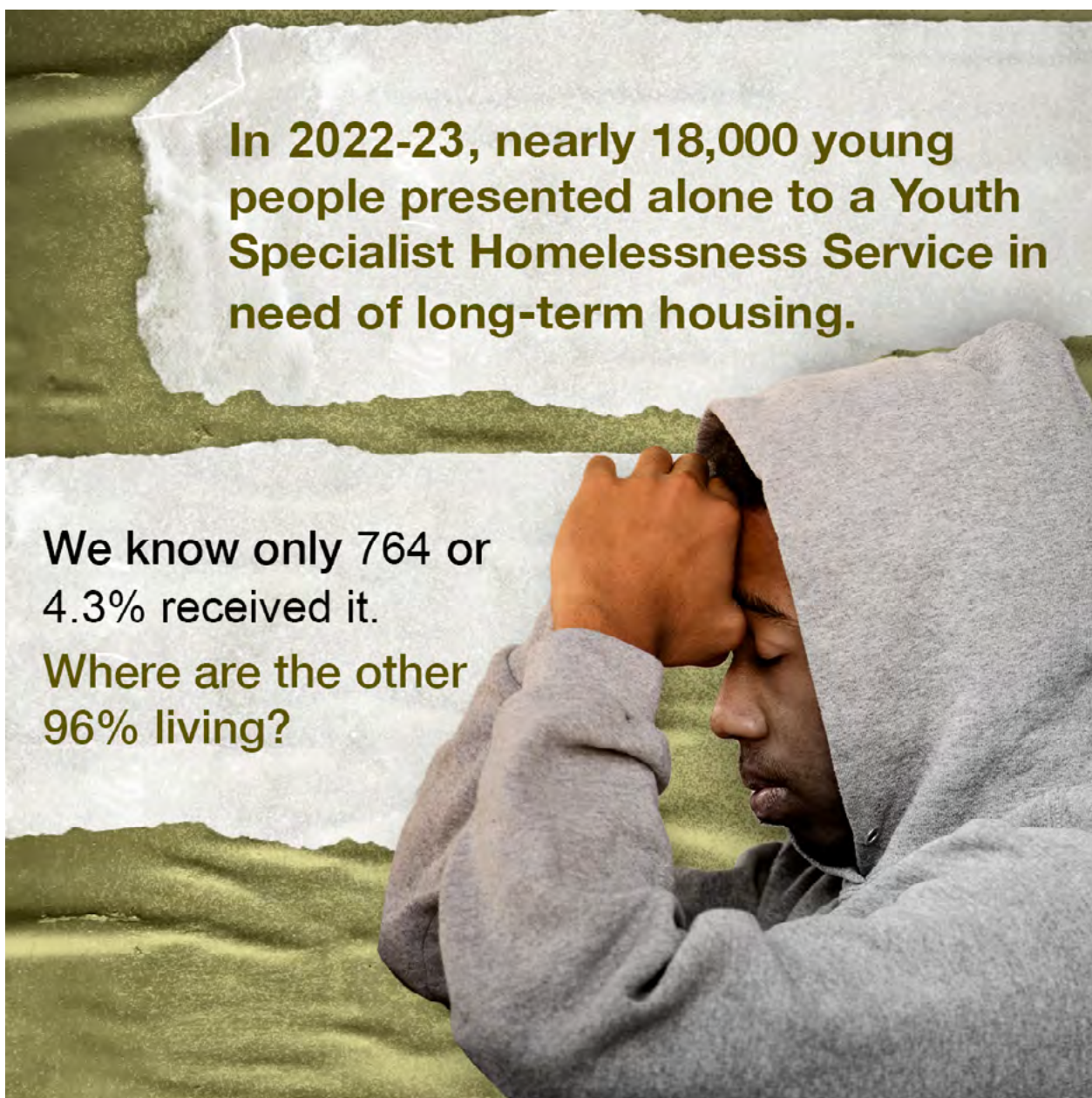
<sup>14</sup> Ibid



## 2.1.5 Lack of appropriate housing options

In 2022-23, nearly 18,000 young people presented alone to a Youth Specialist Homelessness Service in need of long-term housing. However, only 764, or 4.3% received the long-term housing they needed.<sup>15</sup>

Access to appropriate housing is fundamental to an effective service system response to unaccompanied child and youth homelessness. There is not enough child-specific and young people specific supported housing to enable rapid rehousing responses when homelessness does occur. In addition, the inaccessible nature of the private rental market and limited supply of social and affordable housing impacts the longer-term success of young people who have experienced homelessness to transition sustainably to independence and not experience homelessness again later in life.



<sup>15</sup> AIHW (2024)



## 2.1.6 Couch surfing

Nationally the Australian Bureau of Statistics has highlighted the difficulties in measuring the extent of couch surfing (one of the most prevalent forms of youth homelessness) because it is often masked and misreported.<sup>16</sup> However we know from the Specialist Homelessness Services 2022-23 data that 28% (6,800) of young people presenting alone to Specialist Homelessness Services reported they had been couch surfing at first presentation.<sup>17</sup>

Having a couch or room to stay in someone else's place does not always mean that children and young people are safe. Couch surfing puts children and young people at risk of exploitation, sexual servitude, violence and sexual violence. Sometimes children and young people can be pressured into criminality to secure that couch to sleep on.

We also know that children and young people moving between houses without a stable home are a very vulnerable cohort. Whilst the research is sparse, what does exist shows that young couch surfers have disproportionately poor mental health and less connection to professional and community support than children and young people in other homeless groups.<sup>18</sup>



## 2.1.7 Severe overcrowding

Severe overcrowding, another prevalent form of homelessness that children and young people experience, puts them at high risk of negative impacts on their physical and mental health, developmental and educational outcomes. It can also increase the likelihood of family conflict and tenancy dissolution, both drivers of youth homelessness.

The 2021 Census data reveals that 50% of those experiencing severe overcrowding are aged under 25 years, up from 45% in the 2016 Census. Under 12-year olds and 19-24 year olds make up the second and third highest age brackets respectively, across all age groups, living in severely overcrowded dwellings.<sup>19</sup>

<sup>16</sup> ABS (2018), *Census of Population and Housing: estimating homelessness 2016*

<sup>17</sup> AIHW (2024)

<sup>18</sup> Hail-Jares K, Vichta-Ohlsen R and Nash C (2020), *Safer inside? Comparing the experiences and risks faced by young people who couch surf and sleep rough*, Journal of Youth Studies

<sup>19</sup> ABS (2023)

## 2.1.8 Mental ill-health

The increasing incidence of poor mental health among children and young people experiencing homelessness is a major concern.

In 2021-22, of the 85,200 clients with a current mental health issue who received support from Specialist Homelessness Services, just over 30% (26,016) were children and young people aged 10 – 24 years: 16, 321 were aged 18-24 years, 6,157 were 15-17 years and 3,538 were aged 10-14 years. Across Australia, of the 38,300 young people aged 15-24 years who presented alone to a Specialist Homelessness Service in 2022-23, 48% had a current mental health issue.<sup>20</sup>

The absence of safe and secure accommodation, compounded by poor health, financial limitations and social isolation, has ongoing negative effects on young people's mental health and general wellbeing. Furthermore, it is not uncommon for young people to experiencing homelessness to develop unsafe coping strategies (for example, drug and alcohol dependencies) in response to trauma and daily struggles.

## 2.2 First Nations children and young people are over-represented in the homelessness service system

Aboriginal and Torres Strait Islander unaccompanied children and young people make up 32% of the total number of unaccompanied children and young people presenting to Specialist Services across Australia.<sup>21</sup> Given that Aboriginal and Torres Strait Islander people make up 3% of the broader population, this is a stark statistic that highlights another key area of focus for closing the gap of disadvantage between Aboriginal and Torres Strait Islander and non- Aboriginal and Torres Strait Islander Australians.

Furthermore, the research into intergenerational homelessness highlights that the rate for Aboriginal and Torres Strait Islander people is 69%, much higher than the non- Aboriginal and Torres Strait Islander rate of 43% - that is, Aboriginal and Torres Strait Islander people are much more likely to have periods of homelessness repeated across generations of the same family. This research also found that Aboriginal and Torres Strait Islander people surveyed were more likely to have experienced homelessness prior to the age of 18 years than non- Aboriginal and Torres Strait Islander people, many before the age of 12 years.<sup>22</sup>

Aboriginal and Torres Strait Islander households are also 2.9 times more likely to be overcrowded than non-Aboriginal and Torres Strait Islander households. Over 18% of Aboriginal and Torres Strait Islander people were living in overcrowded conditions on Census night 2021. While these statistics have been improving over time, overcrowding can have significant health and wellbeing consequences.<sup>23</sup> It can also be a push factor for youth homelessness as young people leave overcrowded living conditions but are unable to afford or access alternative housing.

## 2.3 There is a pathway from child and youth homelessness to adult homelessness that must be disrupted

We know from research that people who experience homelessness as a child or young person are more likely to face homelessness again as an adult.<sup>24</sup> The important 2013 Australian Housing and Urban Research Institute (AHURI) research, 'Lifetime and intergenerational experiences of homelessness in Australia', found that half of the adults experiencing homelessness who they surveyed had run away from home before they were 18 years old, experiencing a period of child or youth homelessness. For those who had experienced homelessness before the age of 18 years, it was not just one instance of homelessness, it was numerous.

We also know that of the 38,300 children and young people presenting alone to SHS across Australia in 2022-23, 61% (23,452) were returning clients.<sup>25</sup> The cumulative effects of disruption to education, transition to employment, and social networks; and the trauma of harsh living conditions, exposure to sexual exploitation, violence and poverty can have far-reaching and long-lasting impacts.

<sup>20</sup> AIHW (2022) (2024)

<sup>21</sup> AIHW (2024)

<sup>22</sup> Flatau P et al (2013)

<sup>23</sup> AIHW (2023), *Aboriginal and Torres Strait Islander Health Performance Framework: Summary Report July 2023*

<sup>24</sup> Flatau P et al (2013), *Lifetime and intergenerational experiences of homelessness in Australia*, AHURI National Report 200. Melbourne.

Australian Housing and Urban Research Institute

<sup>25</sup> AIHW (2024)

The AHURI intergenerational homelessness research also confirms that people who have been placed in OOHC are much more likely to experience homelessness as an adult - aligning long-standing research that shows young people who have been in OOHC are at greater risk of youth homelessness than most young people with research showing that young people who have been in OOHC and experience homelessness as a young person, are at greater risk of experiencing homelessness as an adult.<sup>26</sup>

Preventing or reducing the impact of homelessness for children and young people will have life-long benefits to those individuals and alleviate the long-term demand pressures on the adult homelessness service system, as well as the health, mental health and social welfare systems.

## 2.4 The 'adultification' of children and young people is part of the problem

Children and young people who leave their family home or guardianship are at real risk of 'early adultification', that is, assuming adult-like responsibilities above and beyond what is experienced by children and young people who are able to stay in their family or long-term stable home environment. This creates elevated levels of stress and mental strain as these responsibilities hit before they are fully mentally and emotionally prepared to take them on.<sup>27</sup>

When responses are not tailored to the developmental stage of children and young people, we see an 'adultification' of service delivery that cannot fully meet the needs of children and young people experiencing homelessness, and places children and young people under further stress and trauma.

We must stop the 'adultification' of children and young people in strategies and service responses whereby it is assumed that what works to address adult homelessness works for children and young people.



<sup>26</sup> Chamberlain C and MacKenzie D (1998). *Youth homelessness: Early intervention and prevention*, Australian Centre for Equity Through Education; Chamberlain C and Johnson G (2013) *Pathways into adult homelessness*, *Journal of Sociology*, Vol 39 Issue 1

<sup>27</sup> Schmitz RM and Tyler KA (2016) *Growing up before their time: the early adultification experiences of homeless young people*, *Children and Youth Services Review*, Volume 64, pp 15-22



## 2.5 Children and young people experience homelessness differently to adults and require a different response

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Ending child and youth homelessness will only be a reality if a clear, targeted and developmentally appropriate national plan is initiated. While Yfoundations has welcomed the Australian Government's commitment to a National Housing and Homelessness Plan, subsuming children and young people into generic adult housing and homelessness responses, or including them as a priority cohort, is not enough for the following reasons:

- Children and young people don't have the same coping strategies and resources generally attributed to adults (whether that's financial, support networks or life experience) to self-address their lack of access to housing and services. This means responses to children and young people presenting as homeless requires the service system to respond differently, particularly by adopting a trauma-informed, age and development-appropriate lens to any response.
- Children and young people need age and developmentally appropriate responses. Successful responses for adults such as Housing First are not going to be suitable for children and may not necessarily be suitable for young people who might need care first as opposed to housing first.
- We know the triggers that escalate children and young people into homelessness are different to those of adults: neglect; family breakdown and dysfunction; lack of effective care and guardianship by family or state governments; homophobia; and transphobia.
- While we know that other dominant triggers such as DFV and sexual violence, abuse, racism and poverty are also key triggers for adults, children and young people don't have the same experiences, coping strategies or resources as adults, which will most likely make them more vulnerable and their experiences possibly dangerous.
- We also need to recognise that these triggers - or precursors into homelessness - for children and young people will be traumatic. We know that trauma can have devastating impacts on children, which will carry into their adult lives. Specialised responses must be responsive to trauma and consider ways that children and young people can heal to reduce the long-term impacts in their adult lives.

# 3. What needs to be included in a standalone Child and Youth Homelessness and Housing Plan?

## 3.1 A multi-systemic response is required

Ending child and youth homelessness looks different to ending adult homelessness or solving the housing crisis. Reflecting the complexity and multi-systemic nature of child and youth homelessness, the ideal service system to prevent, respond to and exit unaccompanied children and young people at risk of or experiencing homelessness is described in the following diagram.

### The ideal service system to prevent, respond to and exit unaccompanied children and young people at risk of or experiencing homelessness



At a minimum, the continuum requires a suite of responses to respond to a breadth of issues, age cohorts and needs such as:

- Family mediation and reunification services such as the Homelessness Youth Assistance Program (HYAP) which supports children 12-15 years old in NSW.
- An increase in crisis beds so children and young people know they have a place to sleep tonight when their situation is desperate and dangerous.
- Exit options from crisis accommodation such as transitional housing (for 2-5 years) and medium-term housing (a higher level of support for those with more complex needs for about two years). These exit options will also provide longer term options for young people who currently refuge hop every three months due to time restrictions imposed on service providers.
- Specialised responses and crisis accommodation for young people experiencing DFV.
- More affordable and social housing for young people. Rarely is public and community housing quarantined for young people as other cohorts are often prioritised.
- More social housing for young people to live in permanently if they are not suitable for the private rental market due to high and complex needs.
- Foyer models.
- Early intervention models such as the Community of Schools and Services (COSS) model that identifies children and young people at risk or experiencing homelessness in high schools.
- Improved OOHC responses particularly for children and young people who are older and often not considered a priority or at risk of significant harm.
- Improved supported exits for young people from OOHC and youth justice.
- Better access to mental health services where children and young people with serious issues such as suicide ideation are not having to wait for six months to get an appointment as we are hearing from regional areas.
- Better access to supported exits into the National Disability Insurance Scheme (NDIS) where appropriate.

Without a focus on addressing all of the unique drivers of child and youth homelessness and a commitment to the broad range of services and interventions required, child and youth homelessness will remain the same and growing challenge to the fabric of Australian society it has been for many decades. As responsibility for the breadth of response required does not fall on a single level of government or agency, it is clear that national leadership that binds the States and Territories and service providers, is required if a future without child and youth homelessness is ever to be realised.

### **3.2 The need for appropriate models of housing for children and young people – Housing First is not always the right response**

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The broad approach required to address child and youth homelessness must include a focus on, and investment in, a diverse range of housing models that respond to their differing needs and that focus on rapidly housing them safely with appropriate support.

Safety is the first priority when housing a child or young person. Then it's possible to focus on working with the child or young person to identify the best long-term housing solution they may seek to move to over time if required, appropriate to their age, level of development and capacity for independent living.

Often children and young people don't need long-term housing solutions. With time-limited housing and the right tailored support, they can move on to the right next step - whether that is returning to family or, for young people, moving into their own independent housing. However, given the inherent vulnerabilities of children and young people, this housing needs to be separate from housing for the adult homeless population.

A Housing First model - where allocating housing is the first response - combined with wrap around supports to assist the person to sustain their tenancy is a very effective adult homelessness response. However, this is not always the right response for young people.

For young people, we have well established youth specific housing models and support practice frameworks that work to set them up for independent living. We know these models work well where the housing provided



is high quality and in the right location, and the support services are adequately funded to address the level and complexities of support required.

The right model at the initial point of being housed may be a short-term option with high levels of support, allowing for a transition to other forms of accommodation over time or a medium- to long-term option with lower levels of support. Responses should be focused on flexibility, so services are best able to respond to the individual needs of young people and ensure they are able to support a young person to have agency in setting and meeting their own housing goals.

The considerations for what type of model may be appropriate include:

- age
- level of development/ skills for independent living
- health and mental health status
- type and availability of support services
- income level and capacity to participate in employment
- longer-term housing and independent living aims.

### **3.3 Most current housing investments do not address the needs of children and young people**

A key issue for the success of supported housing models is having a sufficient supply of housing that is appropriate and affordable for young people to move to at the end of their tenure. The lack of supply is a significant issue and results in an inefficient homelessness response system as young people remain in higher cost, supported models longer than they need and youth Specialist Homelessness Services spend more of their time trying to support young people to find affordable rental options to exit to.

Traditionally, social housing has not been a housing option for young people exiting supported accommodation due to the priority focus on housing older people with long-term housing needs. In 2022, only 2.7% of social housing (across public and community housing) head tenants were aged 15-24 years.<sup>28</sup> Specialist Homelessness Service providers know they will only rarely, and with much advocacy, be able to support a young person to access a social housing home.

Many young people who are supported through the homelessness system do not require social housing as a long term housing option as they have been supported to enter the workforce and have capacity to cover private rental market costs in shared housing and, in some circumstances, affordable rental housing (although they are often under housing stress). These young people would benefit from access to social housing for a medium-term period while they study or finish an apprenticeship as they are unable to rely on their families to support them during this period.

There are also young people who would significantly benefit from access to long-term social housing, including young people managing a long-term mental health diagnosis or living with disability. These groups of young people should be given a priority housing allocation category for social housing with a partnership arrangement put in place to support smooth transitions from Specialist Homelessness Service support to living in social housing.

### **3.4 A review of the current policy settings for social and affordable housing and private rental products is required**

A review of current policy settings for social housing to determine how policy changes could better support young people who have experienced homelessness to sustainably transition to living independently would be beneficial to determine what is possible within the current system to better meet the needs of young people. This will be a key factor in reducing the number of young people who experience homelessness who then go on to experience homelessness as an adult, often multiple times.

A review of policy settings for affordable rental housing would also be beneficial to determine if there is capacity to adopt an adjusted rent setting approach to a rate affordable to young people on low incomes, such as those who are studying, on apprenticeships or in early career roles. This would open an increased supply of rental options to young people struggling to access rental accommodation that they can afford.

<sup>28</sup> AIHW (2023) *Housing Assistance in Australia*

In addition, the policy settings for a range of private rental products and supports provided at a state or territory government level would also benefit from review. This is to ensure the level of subsidy or funding are sufficient to cover the cost of private rental market tenancies given significant price increases, and the program design is attractive to private landlords. This is particularly important for products that aim to support young people to access the private rental market as young people are often discriminated against because of their lack of rental history.

### 3.5 There is a need for significant investment in housing for children and young people

As part of its submissions in response to the National Housing and Homelessness Plan Issues Paper, Yfoundations estimates as a minimum, a national shortfall of at least 12,750 units for supported housing for young people experiencing homelessness. This was based on the number of young people who presented at a Specialist Homelessness Service in need of housing, who were not able to access a safe place to stay.<sup>29</sup>

To address this, an investment of \$4.5 billion<sup>30</sup> would be required to ensure a rapid housing response is available for homeless young people in need.

Whilst investments like the Australian Government's announcement of \$1 billion under the National Housing Infrastructure Facility for crisis and transitional accommodation for women and children escaping domestic violence, and for young people, are welcome they fall significantly short of the level of investment that is required.



<sup>29</sup> AIHW SHS Annual Report 2021-22 data identified that 8,516 young people presenting alone to an SHS seeking short-term or emergency accommodation were not housed immediately by that SHS service. While 1,924 were referred on to another service and 6,592 were not immediately housed or referred, we don't know what happened regarding their housing. If we assume they supported housing or an 18-month period to get them back on track, this equates to needed 12,774 additional rooms in shared accommodation or dwellings. Whilst this an imperfect estimate of demand levels, we know that other figures, such as young people couch surfing, are seriously under-reported.

<sup>30</sup> Assuming \$350K cost per new dwelling, assuming smaller studio dwellings to meet the needs of mostly single people and some shared accommodation models.

# 4. National Housing and Homelessness Plan Bill 2024 (No. 2)

With reference to the detailed content of this submission, Yfoundations provides the following comments and recommendations with respect to the National Housing and Homelessness Plan Bill 2024 (No. 2), for the consideration of the Senate Economics Legislation Committee.

## 4.1 Objects of the Act

Recognition of the right to adequate housing as a fundamental human right is critical to addressing child and youth homelessness. However, as clearly demonstrated in these submissions, child and youth homelessness is more than just a housing issue and involves the violation of a broad range of human rights. In order for the proposed Act to effectively respond to child and youth homelessness, the objects of the Act need to take into account these broader considerations so as to take a fully informed human rights approach to addressing child and youth homelessness.

### Recommendation 1

That the objects of the Act include reference to the broader range of fundamental human rights that are violated when a child or young person is at risk of or experiencing homelessness, including the rights to health, personal safety, education, work, non-discrimination and social security.

### Recommendation 2

That the objects of the Act further the progressive realisation of the broader range of human rights violated when a child or young person experiences homelessness as well as compliance with relevant international commitments, including the Convention on the Rights of the Child.

## 4.2 National Housing and Homelessness Plan

Given the history of policy failure and the clear need for a different approach to solving child and youth homelessness there should be a legislated requirement that the Minister prepare a standalone National Child and Youth Homelessness and Housing Plan. To avoid the 'adultification' of children and young people and to ensure investment in activities that work for this hidden and often forgotten group that will break the cycle of intergenerational homelessness, the requirement should be that the Child and Youth Plan be developed in addition to the broader National Housing and Homelessness Plan.

### Recommendation 3

That Part 2 of the Act requires that the Minister prepare a National Child and Youth Homelessness and Housing Plan in addition to the National Housing and Homelessness Plan.

### Recommendation 4

That all references to the National Housing and Homelessness Plan in Part 2 of the Act also refer to the 'National Child and Youth Homelessness and Housing Plan'.



## **4.3 Content of the Plans**

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Homelessness is more than just a housing issue. A human rights approach to addressing homelessness, especially for children and young people, requires a comprehensive and integrated approach that takes into account its many varied causes and effects. The content of a National Child and Youth Homelessness and Housing Plan, as well as the National Housing and Homelessness Plan, must be directed to addressing the breadth of intersecting issues including, but not limited to, reform of housing systems.

### **Recommendation 5**

That Part 8 of the Act 'Content of National Housing and Homelessness Plan' be expanded to include the National Child and Youth Homelessness and Housing Plan and a focus on connections with the broader service systems relevant to addressing homelessness including, but not limited to, health and mental health, personal safety/child protection, education and employment, exiting care institutions and social security.

## **4.4 National Housing Consumer Council**

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Given homelessness is not just a housing issue and that ending homelessness, particularly child and youth homelessness, requires action in a broad range of intersecting service systems, it is imperative that the Minister receive advice from the perspective of consumers in more than just the housing system.

Significant care needs to be taken to support the participation of young people with lived experience of homelessness in advisory groups, to ensure that their participation is more than just symbolic. There is a significant risk that if one or two young people were included in the proposed National Housing Consumer Council, they would quickly become disengaged if their participation was not adequately supported. In addition, the complex nature of child and youth homelessness warrants a Ministerial advisory group focused solely on a standalone National Child and Youth Homelessness and Housing Plan. Where a separate child and youth advisory group was established, the risk of symbolism and disengagement would be significantly reduced.

### **Recommendation 6**

That the National Housing Consumer Council be renamed the National Housing and Homelessness Consumer Council so as to reflect a broader remit than on housing issues alone.

### **Recommendation 7**

That a separate National Child and Youth Housing and Homelessness Consumer Council be established.

### **Recommendation 8**

That all references to the National Housing and Homeless Consumer Council and its operations at Part 3 of the Act also refer to the National Child and Youth Housing and Homelessness Consumer Council.

### **Recommendation 9**

That the membership and function of both Councils be expressly expanded to advise the Minister from the perspective of consumers in the broader range of service systems relevant to addressing homelessness, not just the housing system.

## **4.5 National Housing and Homelessness Advocate**

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The proposed National Housing and Homelessness Advocate establishes an important mechanism for monitoring the implementation of the National Housing and Homelessness Plan. Given the recommendations herein for a standalone National Child and Youth Homelessness and Housing Plan, consideration should be given to either establishing another Advocate to monitor the implementation of that Plan or a senior role within the office of the National Housing and Homelessness Advocate charged with monitoring the Child and Youth Plan.

Whilst the conduct of reviews by the Advocate/s is also an important function, consistent with the recognition of the broad systemic issues relevant to addressing homelessness, particularly child and youth homelessness, the focus of those reviews must be on more than just 'systemic housing issues' as proposed in the Bill.

### **Recommendation 10**

That consideration be given to establishing a separate National Child and Youth Housing and Homelessness Advocate or a senior role within the Office of the National Housing and Homelessness Advocate to monitor implementation of the National Child and Youth Homelessness and Housing Plan.

### **Recommendation 11**

That the Functions of the Advocate/s at Section 33 of the Act be expanded to include the conduct of reviews into the broader range of systemic issues impacting on homelessness, rather than being focused on systemic housing issues alone.

### **Recommendation 12**

That all reference to reviews of 'systemic housing issues' at Division 3 of the Act be updated to refer to 'systemic housing and homelessness issues'.