Submission to the Department of Communities

Directions Paper for the 10-Year Strategy on Homelessness

17 May 2019

The Western Australian Council of Social Service Inc. (WACOSS) welcomes the opportunity to make a submission to the Department of Communities' directions paper for the 10-year strategy on homelessness.

WACOSS is the peak body of community service organisations and individuals in Western Australia. WACOSS stands for an inclusive, just and equitable society. We advocate for social and economic change to improve the wellbeing of Western Australians and to strengthen the community services sector that supports them. WACOSS is part of a national network consisting of ACOSS and the State and Territory Councils of Social Service, who assist people on low incomes and experiencing disadvantage Australia wide.

The vision outlined in the Directions Paper wherein "*…everyone has a place to call home and is supported to achieve stable and independent lives…*" is a positive approach to addressing homelessness, one WACOSS endorses and considers well supported by the principles that follow it. The importance of safe and secure shelter cannot be overstated. It is a fundamental building block for improving a person's wellbeing and is essential for people to be able to participate fully, both socially and economically, in our community. Homelessness leaves those experiencing it disconnected from family, friends and their community, and with a lack of control over their environment. By ensuring people are able to access safe and secure shelter, we not only provide people with the capacity to achieve better life outcomes, but through those better life outcomes the need for other services is significantly reduced and community cohesion is enhanced.

WACOSS provides this submission and the recommendations below as measures that will be necessary to achieve that vision in addition to those outlined in the Directions Paper. The Directions Paper marks a positive first step in the development of the 10-Year Strategy and WACOSS looks forward to engaging with the Department further as the process continues.

Recommendations

- Establish clear targets to increase the stock of social and affordable housing, and the number of crisis and transitional accommodation facilities
- Audit existing specialist homelessness service contracts to ensure that they are compliant with the *Delivering Community Services in Partnership* policy
- Address the criminalisation of homelessness and implement preventative measures to reduce evictions (such as free tip passes for public housing tenants)
- End evictions of public housing tenants into homelessness
- Consider the needs of older LGBTIQ+ people and people on temporary visas as part of the Strategy

- Provide ongoing advice to Government through the Supporting Communities Forum together with place-based consultation and co-design measures at a local and regional level
- Develop shared, effective and consistent community-based measurement systems to support data collection and linkage throughout the life of the Strategy

Background

There are more than 9,000 Western Australians experiencing homelessness. While government agencies and community service organisations have implemented programs to support people experiencing homelessness and to address its causes, there has so far been an absence of an overarching, coordinated cross-government strategy. WACOSS strongly commends the State Government for starting the development of a 10-year strategy on homelessness. WACOSS also strongly supports the strategic work that has already been undertaken by the *WA Alliance to End Homelessness* to inform the process of ending homelessness in our state.

While the unaffordability of housing is not the only cause of homelessness, it is very much a significant contributing factor. The Department of Communities' Demand Model estimates that there is an unmet social and affordable housing need in Western Australia for approximately 61,000 very low, low, and moderate income households—consisting of over 28,000 very low income households and over 33,000 low or moderate income households.[1] Modelling published by the Australian Housing and Urban Research Institute (AHURI) estimates that there are around 59,000 Western Australians unable to enter market housing and a further 73,000 requiring rent assistance to alleviate a position of rental stress.[2]

The risk of poverty is more than twice as high for households renting privately than home-owners with or without a mortgage. Poverty is the highest amongst public renters, though this is in part due to the fact that eligibility requirements for public housing means that this group has some of the lowest incomes.[3]

There are 13,953 households on the public housing waitlist and 1,318 on the priority waitlist, where they wait on average for 139 weeks or nearly 3 years to be housed.[4] In Newman alone, it has been estimated that, due to Martu population growth and inadequate investment in Parnngurr housing, the WA Government will need to procure 73 houses by 2028 to accommodate an additional 365 Martu people.[5]

Recent AHURI research has found that much of the growth in Australian housing supply has been in the mid-to-high price segments. Furthermore the research indicates that this increase in the supply

[1] Julie Considine and Sarah Mewett (2017) *Estimating unmet housing demand and priority areas for public and affordable housing at the Local Government Area level – a housing practitioner's approach*, WA Department of Communities. Noting 'affordable' is defined as spending up to 30% of income for those in the bottom 40% of incomes (40/30 rule).

[2] Steven Rowley, Chris Leishman, Emma Baker, Rebecca Bentley, and Laura Lester (2017) 'Modelling housing need in Australia to 2025' *Australian Housing and Urban Research Institute*, AHURI Final Report 287

[3] ACOSS (2018) *Poverty in Australia*

[4] Rethink Social Housing, Government of Western Australia, http://www.rethinksocialhousing.com/The-Waitlist

[5] Social Ventures Australia (2018) *A Cost Benefit Analysis of Investment in Very Remote Aboriginal Communities*, Discussion Paper – Implications for Housing

in these segments is not creating a 'trickle-down' effect into the low price segments by freeing up established housing stock.[6]

This lack of trickle-down is reflected in the findings of the WA Housing Industry Forecasting Group, which noted that, despite historically high levels of rental stock, "for those on the lowest incomes, conditions have not changed."[7] This outcome is the result of a long-term underinvestment in social housing together with the treatment of private rental properties as investment vehicles for individuals.

There is compelling evidence that the provision of public housing for National Partnership Agreement on Homelessness (NPAH) program participants in WA has been linked to significant reductions in the proportion, frequency and duration of health service use. For the 3,400 individuals analysed in the study, this decrease potentially saved the Western Australian health care system a combined $16.4 million a year or $4,846 per person per year. [8]

The 2019 *Anglicare Rental Affordability Snapshot* found that for a single on the Newstart Allowance, there were no affordable and appropriate private rental properties in the entirety of Western Australia. This report takes a 'snapshot' on a given day of the rental market and examines whether the properties being advertised are both affordable for a range of different low income types and whether those properties are appropriate for the composition of their household.

This lack of any affordable and appropriate rentals was also the case for a single on Youth Allowance, including those looking for share housing. A single on Newstart with one child was able to find just two affordable and appropriate properties across the state, though neither were in the Perth Metropolitan area. A single receiving the disability support pension was only able to locate 11 properties in Perth that were affordable and appropriate, and a further 9 in regional areas.

This demonstrates just how difficult it is for those on low and fixed incomes to able to secure affordable housing, which places them at substantial risk of experiencing homelessness.

Sustainable pathways out of homelessness

Collaboration

WACOSS welcomes the commitment to the co-design of programs and services with consumers and communities. Co-design should be defined as a robust and genuine partnership between government, community service providers, and service users from the beginning of the planning and

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[6] Rachel Ong, Tony Dalton, Nicole Gurran, Christopher Phelps, Steven Rowley and Gavin Wood (2017) 'Housing supply responsiveness in Australia: distribution, drivers and institutional settings', *Australian Housing and Urban Research Institute*, AHURI Final Report 281

[7] Housing Industry Forecasting Group (2017) *Forecasting Dwelling Commencements in Western Australia 2017-2018*

[8] Lisa Wood et al (2016) 'What are the health, social and economic benefits of providing public housing support to formerly homeless people?', *AHURI Final Report No 265*, Australian Housing and Urban Research Institute, p 2

design process that emphasises the importance of recognizing and sharing power and control in decision making.[9]

Inclusion of co-production principles of equality, diversity and accessibility, reciprocity and mutuality is important. Co-production processes can deliver transformative outcomes for individuals, increase the capacity of services and deliver greater economic value for service users and the public purse where they are genuine and properly resourced.

WACOSS believes that there needs to be clear directions and guidelines about both what constitutes co-design and the threshold for which it should be a requirement. We acknowledge there may be circumstances under which we may not have the need or capacity to co-design every procurement process (such as the renewal of ongoing services where the service model has been evaluated and is considered robust and still appropriate, or in relation to one-off, short-term or small-scale projects and grants). However, if the Strategy is making a genuine commitment to co-design it needs to be clearer about its expectations or requirements to avoid confusion, disappointment, wasted effort and partners working at cross purposes.

Sustainable Funding and the Delivering Community Services in Partnership Policy

Absent from the discussion of relevant and intersecting strategies and policies in the Directions Paper is the *Delivering Community Services in Partnership Policy* (DCSP). The DCSP Policy is an important consideration in designing a system to address homelessness, as a key component of providing sustainable pathways out of homelessness is ensuring the sustainability of the services that those experiencing or at risk of homelessness need.

The DCSP Policy established in July 2011, was intended to see the transition over time to fairer and more accountable funding models, where contracts would be based on outcomes, and service providers would be able to negotiate the true cost of service delivery. However, a significant proportion of service contracts currently operating in WA are not DCSP compliant, including many that predate proper implementation of the policy and have been rolled-over multiple times without an opportunity to renegotiate deliverables or funding levels. There are also a significant proportion of service contracts put in place after the adoption of the policy that have not complied with it fully, particularly in relation to meeting the true cost of care.

That these contracts are not DCSP complaint is exacerbated by the 2015 changes to the *Non-Government Human Services Sector Indexation Policy*, which provides no allowance for wage growth and the award obligations as a result of the Equal Remuneration Order. There are numerous services with contracts established before 2012 that have been extended and rolled-over multiple times, with inadequate indexation and no opportunity to renegotiate funding levels or service outputs.

Two independent studies over the last 3 years have evidenced the extent of the impact of the ERO on services, and a third study was recently commissioned by the Department of Communities to examine the impact of the ERO on homelessness services funded under the National Affordable Housing Agreement. Although the Department of Communities has so far been unwilling to release the findings of study, a number of the twenty-three organisations who participated have informed WACOSS that their individual funding levels do not cover the full cost of their service contract.

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[9] *WACOSS Co-Design Toolkit*

Organisations have been forced to restructure, cut costs where possible and, in some cases, have stopped providing or have reduced services where they are no longer financially viable.

WACOSS welcomes the supplementary funding that will be provided to community service organisations funded under the National Housing and Homelessness Agreement that operates 24 hours a day, seven days a week, to applied to upcoming contract variations and extensions for the 2019-20 financial year. We recognise that this supplementary funding has been provided while the Department of Communities finalises both the 10-Year Strategy on Homelessness and the 10-Year Strategy for Reducing Family and Domestic Violence. This supplementary funding, however, is clearly not sufficient to address the issues facing homelessness services, regardless of funding source, and the community services sector more generally regarding their ability to renegotiate existing contracts to reflect the true costs of service delivery.

To this end we recommend the WA Government undertakes an audit of DCSP compliance of existing service contracts to establish the age of contracts, number of contract roll-overs, extent to which outputs including staffing, service levels and operating hours are specified, and the degree to which funding or service quality have been renegotiated on roll-over. Further, we recommend any future contract roll-overs must include either indexation at ERO award compliant rates, renegotiation of outputs or DCSP compliance. A procurement practice review is then needed to understand capability gaps within contract management to enable a shift to outcome-based contracting and collaborative service development and design.

Prevention and early intervention

Criminalisation of Homelessness

Prevention and early-intervention requires a re-examination of the way that police powers and laws effectively criminalise homelessness. This is particularly seen with move on orders and infringement notices. The Centre for Social Impact report on homelessness prepared for the Department of Communities identified how "a revolving door between prison and the street emerges" with those experiencing homelessness having more interactions with the police and justice system, and 31 per cent of Australia's prisoners anticipating a spell of homelessness upon exit from prison.[10]

Police have the power to move people on from an area for 24 hours if they believe an individual is causing disruption or likely to commit a crime. Failing to adhere to this order can then result in a fine or arrest. As well as being potentially discriminatory, move on orders can be highly disruptive and distressing to people experiencing homelessness, who may then need to relocate to another area with all their belongings or have them confiscated. In June 2015, WA Police were also awarded the power to issue $500 on the spot fines for minor offences called 'Criminal Code Infringement Notices', which can be issued for offences including disorderly conduct in public places, such as using offensive or threatening language, as well as urinating in public.[11] It is clear that these powers disproportionately impact on those experiencing homelessness, without providing any actual solutions or interventions.

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[10] Lisette Kaleveld, Ami Seivwright, Emily Box, Zoe Callis and Paul Flatau (2018) *Homelessness in Western Australia: A review of the research and statistical evidence*, Department of Communities
[11] Ibid.

Tip Passes

It has been raised with WACOSS, by groups such as the First Nations Homelessness Project, that the exorbitant prices associated with accessing tipping services are particularly cost-prohibitive for those on the lowest incomes. Being unable to access tips can stand as a significant impediment for low income renters to be able to keep their rental property clean and tidy. For residents in social and private rentals being unable to access tips therefore can have dire consequences, resulting in evictions and homelessness. It has been suggested to WACOSS that providing tip passes as a free or affordable services would be a simple early intervention and prevention measure that can have a dramatic impact on a resident's ability to maintain a tenancy.

WACOSS recommends that the Department of Communities engages closely with the First Nations Homelessness Project to co-design effective early intervention and prevention supports and programs.

Exiting Government Institutions and Public Housing Tenants

WACOSS is very pleased to see a commitment in the Directions Paper to no exits into homelessness from government institutions, including hospitals and out-of-home care. The failure to ensure the provision of stable housing and appropriate support for those transitioning out of institutions creates a significant risk that they will exit into homelessness or find themselves homeless soon after.

Analysis shows that a much higher proportion of those leaving hospitals, psychiatric hospitals and units, or transitioning from foster care or residential care who accessed specialist homelessness services in 2016-17 needed accommodation services, including emergency accommodation, transitional housing, and assistance to obtain long term housing. More than half had received services in the previous five years.[12]

Government institutions need to be held responsible for ensuring that people leaving their care are not exiting into homelessness. Institutions take on this responsibility for people assigned into their care and they need to discharge it appropriately. This responsibility cannot simply be transferred on to specialist homeless services in the absence of adequate information, funding and access to stable housing.

This accountability needs to be monitored and enforced, with appropriate resources dedicated to guarantee access to stable housing for people leaving their care.

As part of this commitment to no exits into homeless from government institutions, a commitment to not evict public housing tenants into homelessness is also required.

Older LGBTIQ+ people

It is encouraging to see a recognition in the Directions Paper of the need for services to that can provide appropriate support for both the growing cohort of young LGBTIQ+ people and older people experiencing or at risk of homelessness.

WACOSS considers it important that the Strategy also recognises the needs of older LGBTIQ+ people at risk of or experiencing homelessness as a cohort that faces its own particular challenges in accessing the support that they need. As stated in the 2017 Mission Australia Ageing and Homelessness report, "many older LGBTI people refrain from divulging their sexuality when

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[12] Australian Institute of Health and Welfare (207) *Specialist homelessness services annual report 2016-17*

accessing services due to fears of discrimination and/or abuse."[13] WACOSS recommends that the Department of Communities consults with GLBTI Right in Ageing Inc (GRAI) to ensure that the Strategy addresses the issues facing older LGBTIQ+ Western Australians.

People on temporary visas

People living in Western Australia on temporary visas do not have Australian citizenship or residency, and so are typically ineligible for government support through Medicare, Centrelink and public housing. When these people's circumstances change, including when they experience a life crisis, their prognosis is often bleak This cohort includes women and children experiencing family and domestic violence. Without support many are forced to remain in or return to a violent relationship. As a result, workers in women's shelters are often reluctant to discharge them, creating bottlenecks in the system. The needs of those living in our community on temporary visas must be considered as part of the development of both the 10-Year Strategy on Homelessness and the 10-Year Strategy for Reducing Family and Domestic Violence. WACOSS urges the Government to increase brokerage funds to assist this cohort, possibly through the existing *Women Without Income* brokerage project.

System transformation

No Wrong Door approach

Securing housing is not the end of a person's journey. In the absence of a system that supports people's needs, they can quickly find themselves struggling to maintain that tenancy they waited so long to access, potentially pushing them into further hardship and homelessness.

An Australian Institute of Health and Welfare (AIHW) study of people transitioning out of public housing in New South Wales and Western Australia, found that tenants who lost their tenancy reported a greater need for mental health, psychological, drug and alcohol, gambling and legal/court support services. Of those who had lost their tenancy, 17 per cent had lost it within 3 months of it commencing and a further 19 per cent within 3 to 6 months. 47 per cent of those who sought assistance from a specialist homelessness agency after exiting public housing were experiencing homelessness, demonstrating the significant risk of falling into homelessness for those who lose their public housing. [14]

This is why it is so essential that the supports needed are available from point of first contact to beyond the point where a tenant may be transitioning out of social housing.

Community housing organisations conduct a full assessment of tenancy history, risk factors and support needs at the point of application. This enables early intervention for those who need support with their tenancies, improving outcomes for the tenant and reducing costs longer term.

The Housing Authority should partner with the community housing and support services sectors to develop a shared assessment framework and joint waitlist that could be used to determine at the beginning who are the tenants for whom the public housing system and its current level of support is appropriate and effective. For those for whom that level of support is insufficient, a targeted and

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[13] Mission Australia (2017) *Ageing and Homelessness: solutions for a growing problem*
[14] Australian Institute of Health and Welfare (2015) Exploring transitions between homelessness and public housing: 1 July 2011 to 30 June 2013.

integrated housing support system, co-designed with the community sector, would enable the provision of the intensive and specialist support they may require to transition into and maintain their tenancy.

An example of this model in practice can be seen with the Tasmanian Government's *Housing Connect*.[15] It functions as a one-stop shop for all housing and homelessness assistance and support needs. It provides access to public and community housing, private rental assistant, emergency accommodation and support services. A core component to the success of Housing Connect is a common assessment framework and shared database.

WACOSS recommends that a shared assessment framework and tenancy support system by co-designed with the community housing and services sectors.

Advice to Government

WACOSS suggests that one of the key mechanisms to provide to advice to government on emerging issues and trends on homelessness over the life of the Strategy should be the Supporting Communities Forum and its subcommittees.

The overarching purpose of a well-resourced and functioning Supporting Communities Forum should be to develop and implement a social policy and community service reform agenda that is grounded in a relationship of partnership and mutual respect between the public and community services sectors, and is focused on achieving better outcomes for the WA community, particularly our most vulnerable and excluded citizens.

While there is a clear need for a high-level mechanism for sector engagement with public sector leaders and policy makers to drive whole of government human services reform, the proposed *SCF* is only one mechanism for engagement. Though necessary, alone it is unlikely to be sufficient to succeed in driving cultural change and service system reform. There needs to be a range of mechanisms to enable more effective engagement and implementation at disciplinary, regional and local levels with a wider range of stakeholders.

Regional Managers Forums and District Leadership Groups, together with Strategic Regional Advisory Councils in the Kimberley and Pilbara have begun developing a more collaborative approach to regional service delivery. These reforms create the possibility for a more inclusive and joined-up approach to regional social planning, together with greater coordination of service system design to create more integrated, responsive and appropriate regional services and deliver stronger, more sustainable outcomes.

The engagement of these forums with local community service providers and community leaders, backed by clear direction and endorsement at high levels within the State Government and public service, can create a mechanism for place-based decision making. Local governments, Regional Development Commissions and Commonwealth funding agencies all have crucial roles that need to be aligned and coordinated for collective impact.

The work of the South West Metropolitan Partnership forum in Davis Park, Beaconsfield, provides an excellent case-study of local collaboration mobilising existing resources to achieve collective impact.

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[15] Housing Tasmania, 'Housing Connect', https://www.dhhs.tas.gov.au/housing/housing_connect

WACOSS recommends that existing Regional Managers Forums and District Leadership Groups are empowered and resourced to become Regional Supporting Communities Forums, including local community leaders as equal partners (consistent with the partnership principles and behaviours). As part of a team that regularly comes together to share their learnings and successes, regional managers would contribute to the further development and refinement of practice guidelines and outcomes frameworks. They could also provide updates on lessons learned to the Supporting Communities Forum and the Cabinet Community Safety and Family Support Sub-committee.

These Regional Supporting Communities Forums should drive local engagement and planning processes to oversee the implementation of these place-based joint-commissioning trials. WACOSS recommends that their activities are supported by a framework and practice guidelines for commissioning place-based integrated services.

There is also a need to build and maintain local community service sector network capacity to ensure the connection, coordination and local knowledge needed for on-the-ground success. Proactive networking is critical in regional Western Australia, where small communities can be separated by huge distances, program coverage is patchy and service providers frequently work in isolation.

With the support of Lotterywest, WACOSS has been undertaking a regional capacity-building project in the Pilbara that demonstrates how additional network and policy capability can leverage greater collective impact. The WACOSS Pilbara Regional Manager role has provided an independent catalyst for change across the region. The capacity of individual service providers has been increased through training, advice and consultancy, while network capacity is enhanced through opportunities for like-minded people to learn and collaborate. The capacity of both Government and the community sector to engage effectively in partnership has improved through information sharing and regional cross sector forums, and the capacity of local services to have their voice heard in State and regional decision-making forums is increased.

Outcomes Framework and Our Communities Report

WACOSS welcomes the clear intention in the Directions Paper to develop an outcomes framework for the Strategy which will directly align with the whole-of-sector Outcomes Framework being developed by WACOSS, the Department of Premier and Cabinet, and the Supporting Communities Forum.

An outcomes framework offers the opportunity to co-design innovative service delivery at population, agency, program and place-based levels. Because the efficacy of service delivery is at the forefront of an outcomes commissioning process, it ensures service flexibility and responsiveness in the service design process, and also indicates how we measure our collective impact. A shared framework for evaluating service outcomes is imperative to inform sector investment and facilitate a more consistent whole-of-government and whole-of-sector approach. It is also essential to achievement of improved community outcomes.

This kind of service architecture is critical in supporting those who are experiencing complex need and entrenched disadvantage, areas where traditional service models and siloed funding programs have repeatedly failed to make inroads. In a period where our community sector faces the combined challenge of both increasing uncertainty in funding and escalating unmet needs, collaborative and targeted service delivery has become more important than ever.

It is also important, however, that this Strategy is connected to the biannual *Our Communities Report*, to be developed by the Supporting Communities Forum working group. Data collection across the life of the strategy must be linked to that of these two initiatives, not only to avoid inefficiency and unnecessary duplication, but to ensure that data is comparable and compatible.

Data Collection

There is significant public sector data on community need and service outcomes, including data generated by the reporting of contracted services. Western Australia has significant opportunity and potential to develop data linkage capacities to provide transformative outcomes for the community. WA was once a leader on data linkage, research and innovation but now lags behind developments in other states.

Fundamental barriers to data linkage in Western Australia are the lack of explicit data standards and protocols across government departments and agencies, and the lack of central leadership driving the interpretation and promotion of data. A central data linkage and analysis unit is needed, to bring together expertise across the public (and research and community) sectors to drive innovation in priority areas to increase social impact and deliver better returns on public resources. The Council supports the recommendations of the *2016 Data Linkage Expert Advisory Group Review,* particularly calls for creating a data linkage statutory body, proactive policy to drive impact and innovation, enabling legislation, ethics oversight and resources to make it happen.[16]

Data needs to be at the centre of policy development and evaluation in this state, but in order for that to occur, there needs to be clear leadership in setting priorities for social and 'public good' outcomes, and a mechanism for commissioning and pooling the research and analysis.

The absence of privacy laws in WA potentially creates a barrier to data sharing, as Commonwealth agencies and other jurisdictions can be reluctant to share and link data in the absence of clear assurances of privacy protection and compliance. State government agencies are often reluctant to share and link data in the context of a lack of clear guidelines and protocols, falling back onto restricting access through undue caution in the absence of enabling legislation and a systemic obligation to share data in the public's best interest. To this end, we recommend the state government prioritise the introduction of enabling privacy legislation and progress the WA Open Data policy to make clear the expectation and onus to share for the public good.

There is no central database of social research in WA that agencies, services and researchers can draw upon to facilitate policy development and service design, to align measurement and ensure prospective research adds to the knowledge base. Other jurisdictions in Australia have developed central data repositories, removed charges and bureaucratic barriers to data sharing and invested in proactively seeking opportunities to use data access and linkage to drive innovation, economic activity and better community outcomes.

It is crucial that part of engaging in data linkage and collection, that government and services address client concerns about data collection and sharing and ensure they can provide informed consent. Service users must be empowered to make decisions to share their own data to support and enable more effective service referrals and the provision of integrated services and support.

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[16] *Developing a whole-of-government data linkage model: A Review of Western Australia's data linkage capabilities.* Data Linkage Expert Advisory Group December 2016 (released 13 October 2017).

There must also be a recognition that as the data systems and data collection become more complex frontline staff will need support and training. Data collection needs to add real value to service user outcomes to justify the additional time take n away from delivering frontline support.

This means that there needs to be funding allocated in service agreements for back end support and recognition of the upfront cost of IT systems to effectively report outcomes, or to engage and support service users online.

It is also important to provide a data dictionary that drives consistent and commensurate data collection. Service agreements often have activities with multiple definitions of what they mean, which can act as a significant barrier to engaging in data linkages across programs and agencies. Linked to this is the need to develop a set of common standards across all homelessness contracts to avoid the complexity of having to ensure multiple programs meet multiple different sets of standards.

The *WA Strategy to End Homelessness* provides a clear set of actions that need to be undertaken in order to create the necessary data collection and linkages that will be required to support the implementation of the Strategy. These included creating a common Western Australian platform for homelessness data that builds on the existing Specialist Homelessness Services database, more homelessness directed research, and clear and measurable targets.

To this end, WACOSS recommends the development of shared, effective and consistent community measurement systems to drive the data collection and data linkages that will be necessary to underpin the successful delivery of the Strategy.

If you would like to discuss this submission further, please contact the WACOSS Research and Policy Development Leader Chris Twomey at chris@wacoss.org.au or 9420 7222.

Yours sincerely,

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