



Tasmanian Youth Housing and Homelessness Group

16 July 2021

The Tasmanian Youth Housing and Homelessness Group (TYHHG) welcomes the opportunity to respond to the consultation on the draft *Under 16 Homelessness Policy Framework* and *Under 16 Practice Guidelines for Specialist Homelessness Services (SHS)*.

TYHHG was established in 2011 by Shelter Tasmania, in partnership with the Youth Network of Tasmania, in response to ongoing concerns by members about the issues facing young Tasmanians at risk of and experiencing homelessness. TYHHG meets regularly, with statewide membership comprising over 20 representatives from non-government organisations that specialise in youth, housing and homelessness services. TYHHG works collaboratively to ensure all young people across Tasmania have access to appropriate housing and housing support options. TYHHG is co-chaired by the CEO of Shelter Tas and the CEO of YNOT.

TYHHG welcomes the progress made by the Under 16 Homelessness Working Group in implementing the recommendations of the Under 16 Homelessness Taskforce; in particular, developing the draft *Policy Framework* and *Practice Guidelines* for consultation and the recent appointment of the new Child and Safety Wellbeing Liaison Officer within the Child Safe Advice and Referral Line (ARL).

TYHHG notes that the draft *Practice Guidelines for Specialist Homelessness Services* are the first to be released for consultation. Practice Guidelines for other departments and services that are part of the response to young people under 16 experiencing homelessness have not yet been developed. This would include *Guidelines* for the Department of Education, Children and Youth and Family Services, the Department of Health, the Department of Justice, Tasmania Police and other services. The effectiveness of the *Practice Guidelines for SHS* is highly dependent on how they interact with these other services and Departments. Due to this interdependence, TYHHG cannot fully endorse the *Policy* and *Practice Guidelines for SHS* without visibility of the whole system, to ensure there are no gaps and that lines of responsibility (including legal responsibility and *in loco parentis*) are clear.

The suggestions below are intended to improve the workability of the *Policy Framework* and *Practice Guidelines*, in particular, clarifying the roles and responsibilities of all the services and Departments involved. Again, TYHHG emphasises that we appreciate the work that has been done to date. The most effective response for those young people under 16 who present unaccompanied at SHS will include attention to the points below.

Response to the draft *Under 16 Homelessness Policy Framework* and draft *Under 16 Practice Guidelines for Specialist Homelessness Services*.

- Services noted that these *Practical Guidelines* do not contain enough detail to provide guidance to workers. If the *Practice Guidelines* are intended to be used by face to face workers in homelessness services, more practical details are needed. If this is a public-facing document, services noted the need for a supplementary version for worker use with added details such as

contact information for key services and Shelters. TYHHG recommends a review by workers through targeted consultation before the draft *Practice Guidelines* for workers are finalised.

- Services remain unclear as to how the *Practice Guidelines* will resolve the key issue of what happens to young people under the age of 16 and not under an order. As noted in the *Policy Framework*, this is 80% of those who present to youth shelters. Clarity of the responsibility and the pathway to safe accommodation is vital both (1) in the short term if the Shelter cannot accommodate the young person, and (2) in the longer term. At present, these young people can be left in a 'holding pattern' in a Youth Shelter because there is no clear alternative for them. Both short term and longer-term options need to be identified, especially for young people who are unable to reunite with family.
- The discussion of *in loco parentis* in the *Policy Framework* refers to the Gillick judgement and its use in health contexts. It is unclear how this would inform the practical context of a young person in a Specialist Homelessness Service. Services noted there needs to be much more specific guidance in the *Practice Guidelines* for this to be helpful.
- TYHHG members would like to see a clear statement of who has the default legal and decision-making responsibility for the young person in the period before a Care Team meeting has been convened, and guidance as to how primary responsibility may be delegated within the Care Team.

While the Youth Support Plan assigns this role to the Care Team, services identified a risk that responsibility will be diffuse and not specifically allocated. We would suggest a key role for Children Youth and Family Services (CYFS) as a participant in all Care Teams. For young people not under an order, CYFS would have the default role of legal responsibility, oversight and accountability for the monitoring of the plan. We recommend this role be included in Attachment 2 *Summary Table of Roles and Responsibilities* using another column for the CYFS and Child Safety roles.

- Attachment 2 *Summary Table of Roles and Responsibilities* does not show distinct pathways for young people under an order and young people not under an order, noting again that about 80% of the unaccompanied young people under 16 who present at SHS are not under an order. TYHHG recommends updating the Table to show the different pathways for these two groups. This could be informed by the different pathways identified in the COVID Response guidelines.
- The *Practice Guidelines* do not show any indicative timelines for responses and actions such as establishing the Care Team. This information will be important to manage expectations of both the young person and the SHS workforce.
- The *Policy Framework* refers to 'improved data collection'. Services questioned what this will look like, how Homelessness Services will be included in the monitoring and review of these improvements, and how this data will be reported.
- Review and evaluation of the *Practice Guidelines* after 12 months is very welcome. TYHHG recommends a role for the current U16 Homelessness Working Group in this review and evaluation. TYHHG would welcome an opportunity to contribute to this process.

- Review and evaluation of the pilot ARL role needs to include input from Specialist Homelessness Services who specialise in support and accommodation for young people. TYHHG would be happy to contribute to this process.
- TYHHG members queried what benchmarks are being used to capture current practice, issues and challenges. Accurate data are essential in order to measure any improved outcomes for young people as a result of changes implemented by the practice guidelines and pilot role. Any evaluation of the changed outcomes for young people that are due to the practice change and new role need careful and accurate measurement, from a starting benchmark of what is happening now.
- TYHHG members raised a concern with resourcing, noting that a single officer in the pilot role within ARL may not be sufficient to cover the numbers of young people aged under 16 presenting unaccompanied to SHS across the state.
- TYHHG strongly recommends the use of gender-neutral language where appropriate in Attachment 1 *Table of Statewide Youth SHS* in place of unnecessarily gendered language such as 'girls and boys'.

For any further information, please contact the TYHHG co-chairs YNOT and Shelter Tas.

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