



**yourtown**  
POWERING **kids**helpline

# **Safe Places Emergency Accommodation Program – Inclusion Round**

A submission to: The Australian  
Government Department of Social Services

**March 2023**

Authorised by Tracy Adams,  
Chief Executive Officer, **yourtown**

**email:** [advocacy@yourtown.com.au](mailto:advocacy@yourtown.com.au) **tel:** 0435 081 939

**yourtown** is a trusted provider of services for young people, with a focus on mental health and wellbeing, long-term unemployment, prevention of youth suicide, child protection, as well as support for those experiencing domestic and family violence. **yourtown** has evolved to helping hundreds of thousands of young people each year by powering a range of service offerings that support them through difficult challenges.

## Our services

- Domestic and family violence refuge, accommodation, and therapeutic supports for women and their children, including post-refuge support
- Accommodation and therapeutic supports for young parents and their children at high risk
- Young Parents Program providing parenting support to help with child development, life skills and health and wellbeing activities in safe, supportive environments,
- Expressive Therapy interventions for young children and infants who have experienced trauma and abuse, or been exposed to violence
- Kids Helpline, providing professional counselling and support to 5–25-year-olds across Australia since 1991
- Kids Helpline @ School and Kids Helpline @ High School, which delivers early intervention and prevention programs through primary and secondary schools
- My Circle, a confidential, private, online peer support network for 13–25-year-olds to share information and build coping skills
- Mental health service/s for children aged 0-11 years old and their families, with moderate mental health needs
- Parentline, a telephone and online counselling and support service for parents and carers in the Northern Territory and Queensland, and
- Employment, education, and social enterprise programs to help long term unemployed young people re-engage with education and/or employment.

## Domestic and Family Violence Support

At **yourtown** we provide safe housing and therapeutic support to women and their children escaping domestic and family violence, and help them to transition into independent, safe, accommodation that is accessible and affordable. We have recently replicated this model by establishing transitional housing support in New South Wales. In 2022, **yourtown** supported 95 women and children with residential crisis accommodation at our domestic and family violence residential facility.

## Children and Families

**yourtown** provides accommodation and intensive individualised support to vulnerable young parents and their children through our San Miguel service. For over 40 years, San Miguel has provided a place to call home for vulnerable and at-risk families. In 2022, San Miguel supported 81 parents, infants, and young children.

## Kids Helpline

**yourtown's** Kids Helpline is Australia's only free and confidential 24/7 phone and online counselling service for young people aged 5 to 25. It offers children and young people a range of care options that are right for their needs and circumstances.

Our commitment to being there anytime, and for any reason, has meant that we have responded to more than 8.6 million contacts from children and young people nationally in the 31 years since our service was first established, whilst also providing tens of millions of self-help interactions via our website and social channels. In 2022, our Kids Helpline counsellors responded to 155,973 contacts from children and young people across Australia, including 5,753 emergency care responses.

**yourtown** welcomes the opportunity to respond to the Australian Government Department of Social Services, Safe Places Emergency Accommodation Program (the Inclusion Round) grant design consultation. **yourtown** strongly supports targeted investment in access to emergency accommodation for First Nations, culturally and linguistically diverse (CALD) women and children, and women and children with disability under the National Plan to End Violence against Women and Children 2022-2032 (National Plan).

For more than 18 years **yourtown** has been providing domestic and family violence support to women and children. We help families from the point of immediate crisis through to transitioning to safe and sustainable accommodation. Our therapeutic model provides support through a multidisciplinary team, who work with families to create a sense of safety and stability that allows women and children to begin processing their traumatic experiences, while simultaneously strengthening parent-child attachments.

It is not clear how the views of young people have been incorporated to better understand their specific supports needs and what improving access to appropriate emergency accommodation means to them. While the Inclusion Round is designed to provide increased and specialist support to First Nations, and CALD women and children; and women and children with disability, it is critical that this process is informed by the direct views and aspirations of young people from these backgrounds, as well as the Office for Youth in keeping with the Government's commitment to the new youth engagement model.<sup>1</sup>

## General feedback

**yourtown** strongly supports the establishment of a robust and strong eligibility framework. However, in its current state the proposed criteria is overly broad and while it touches on the key issues of services being 'culturally appropriate and trauma informed' without identifying the types of evidence applicants are required to demonstrate. For example, 'Criterion 2: Specialist services and appropriate support' outlines a broad list of items that may be considered when assessing an applicant's ability to provide security, safety, privacy, and dignity without clearly linking to a required outcome or how this will better support for women and children escaping domestic and family violence. This is further complicated by the lack of definitional clarity on terms used within the definitions of 'emergency accommodation', 'safe place' and 'specialist service' outlined in Section 4.3.

This is particularly important in relation to the definition provided for 'Specialist Service' as it captures ideas around being 'rights-based, client-centred', 'trauma-informed' 'culturally appropriate' and 'have gender expertise'. To better support applicants the Australian Government Department of Social Services should provide a more comprehensive set of definitions and guidance around how applicants can demonstrate evidence of 'rights-based', 'client-centred', 'trauma-informed' 'culturally appropriate' and 'having gender expertise' in the form of a rubric assessment tool. Further the assessment tool should map the eligibility criteria against the four key identified areas of security, safety, privacy, and dignity to better understand how applicants measure against each.

Our responses to the Discussion Questions are set out below:

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

Yes. However, the lower threshold of \$500,000 would be appropriate where proposals are based on smaller scale project refurbishments. Larger capital works and new building should have a higher minimum threshold amount.

---

<sup>1</sup> See [Labor Commits to New Youth Engagement Model \(anthonyalbanese.com.au\)](https://www.anthonyalbanese.com.au)

## **2. Should applications for mixed-use type proposals secure funding (e.g., loans, state funding, philanthropy) for the long-term housing aspects of their proposal prior to seeking Inclusion Round funding?**

It is recommended that rather than being required to 'secure' funding (e.g., a loan), there should be a clear 'commitment' from funding sources that the required funding for long-term housing will be *able to be secured*, rather than having been *actually secured*. Requiring funding to be secured in advance, would be a costly model for those tendering, particularly for not-for-profits. Given the uncertainty that can attach to grant rounds, it would be extremely costly for an organisation to be required to formally 'secure' funding prior to applying for a grant under the Inclusion Round. Particulars regarding how the commitments *will be secured* (should the tender be successful) should be articulated under the formal tender process, rather than being required as a pre-cursor to the application.

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

The proposed milestone schedule for delivering capital grants<sup>2</sup>, in its current form disadvantages community organisations that do not have the ability and or financial capacity to self-fund initial costs related to development proposals. Under the current structure community organisations will only receive a 20% payment upon the signing of a Grant Agreement. This does not consider essential costs associated with the development of robust proposals (including council fees, legal review of documents, quantity surveyor reports and concept designs).

This will result in community organisations with limited financial resources wearing the costs upfront until the delivery of the 20% initial payment which will re-direct critical funding and resourcing away from helping key client groups such as children, young people, women, and vulnerable families. The proposed milestone schedule for delivering capital grants should be revised to reflect these additional expenses so that it is commercially viable for community organisations to be able to tender.

Further, the proposed milestone schedule for delivering capital grants should be revised to incorporate a review point to assess if the quantum of funds to be provided needs to be increased based on cost escalation (especially given that development periods can run up to 15 months.) Such adjustments would enable community organisations to appropriately manage risk, and make allowances for potential cost, time and any additional risks that cannot be fully predicted.

## **4. Will Development Periods encourage community based FDV service organisations to apply for funding?**

### **a. Is 6 months an appropriate timeframe for the Development Period?**

Three to six months would be an appropriate timeframe. However, it is recommended that there should be mechanisms to enable extension of the development period up to nine months to provide allowances for delays outside of the organisation's control. The proposed six-month timeframe for the Development Period would be appropriate for applicants leveraging off existing programs or services. Where an applicant is proposing a new build the

---

<sup>2</sup>See the Safe Places Emergency Accommodation Program (Inclusion Round) – Program Design Discussion Paper: Signing of a Grant Agreement – 20% initial payment; Base and Frame – 50% payment; Lock-up – 20% payment; Occupancy Permit and confirmation of FDV wrap-around service access for clients – final 10% payment (<https://engage.dss.gov.au/safe-places-emergency-accommodation-program-inclusion-round/safe-places-emergency-accommodation-program-inclusion-round-program-design-discussion-paper/>).

Development Period should be extended to between 12-15 months to support the development cycle as per Figure 1. Extension of the Development Period will also support community organisations to develop a comprehensive and accurate scope of the work and to define functional and technical requirements for the management and execution of their proposals.

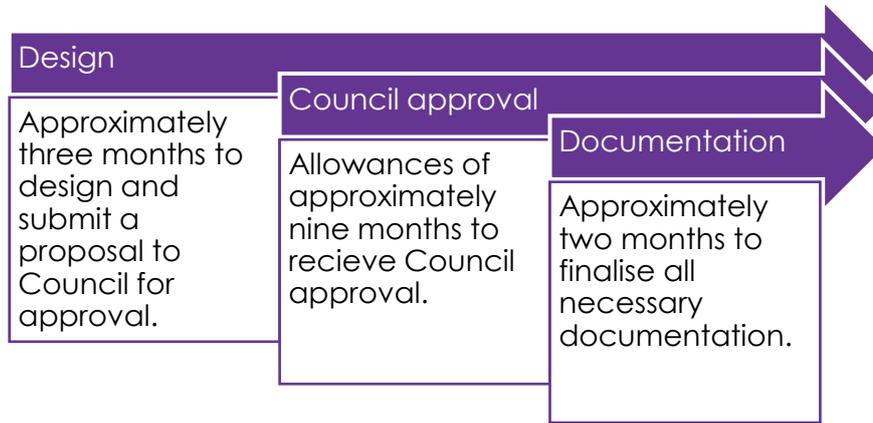


Figure 1 – 12-15 months to support the development cycle

## 5. Are there other ways to support applicants to develop high quality proposals?

Competitive tender models often risk discouraging collaboration or the development of joint responses to effectively meet the needs of First Nations women and children, CALD women and children, and women and children with a disability. This has been demonstrated in the Employment Services Sector with establishment of multiple service providers in each region, fostering competition against one another in order to achieve 'results'.

**yourtown** recommends the Australian Government Department of Social Services encourage providers to work with a broad range of stakeholder including the Police, DV Connect and other providers to better support women and children escaping domestic violence, especially First Nations women and children, CALD women and children and women and children with a disability.

## 6. Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?

The eligibility criteria should be expanded to include the level of evidence required and/or intended impact. The proposed eligibility criteria (while addressing the four key areas of security, safety, privacy, and dignity), do not clearly articulate why each measure is required. In particular, how the criteria will better support First Nations women and children, CALD women and children, and women and children with disability escaping domestic and family violence.

Further, the proposed eligibility criteria do not consider the extent to which applicants have engaged with First Nations, CALD, and/or disability cohorts to both understand and meet their specific supports needs. This is especially important given that the purpose of the Inclusion Round is improving access to appropriate emergency accommodation. It should be a requirement of the application that evidence is provided as to how services have or will work with the target cohorts to address their specific needs; including how services will manage, and address known barriers for the target cohort to accessing appropriate services.

## **7. Are there additional criteria that should be considered?**

It is recommended that under 'Criterion 2: Specialist services and appropriate support' additional criteria should be included to measure the level of social and wellbeing support provided by applicants. This is particularly important given that children exposed to violence in the home can experience profound impacts on their physical, psychological, and emotional health and wellbeing; with ongoing exposure to trauma potentially altering the child's brain development and affecting mental, emotional, and behavioural health into adulthood.<sup>3</sup>

The criteria for consideration should include demonstration of how trauma-informed practices will be implemented, and that are guided by and have consideration of the human rights of the woman, and child/ren. There should also be consideration of what opportunities will be created to rebuild the family unit as well as empowerment for the women and children being supported. It is recommended the following additional criteria be included to better support women, children, and the family unit:

- child development support to ensure the achievement of developmental milestones through activities such as on-site playgroup and referral to external specialists and allied health professionals
- social skills development to support families to regain a sense of normality by providing opportunities to engage in recreational and learning activities
- attachment parenting support to strengthen parent/child attachment through for example participation in activities such as play-based learning, and
- the ability of the proposed service to apply flexibility within the service model/offering to meet the individual needs of each family unit and members.

Applicants should also be assessed on their ability to meet and evidence commitment to the National Principles for Child Safe Organisations and Safety by Design Principles. Such an approach places safety and rights at the centre of the design and development of services. This is especially important in the provision of domestic and family violence support to ensure a preventative approach to harm, risk of harm or re-traumatisation. This ensures applications take an approach that is designed to anticipate and prevent potential harm or re-traumatisation which might occur while using services, rather than trying to implement remedies after the harm has occurred. Proposals should also demonstrate how they will meet 'child safe' standards, when engaging, interacting with, and supporting children and young people at the service.

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

**yourtown** recommends that the Australian Government Department of Social Services consider whether an applicant has engaged in a process of consultation with local First Nations Community in the design of their service. Ideally, they should be able to demonstrate evidence of such consultation with First Nations women, and children to better understand their specific supports needs. Further the following should be considered when determining the suitability of an applicant:

- evidence of healing practice including –
  - deep listening
  - strengthening relationships to maintain the interconnectedness between self, family and extended kinship networks, community, place country, Elders, spirituality and ancestors

---

<sup>3</sup> Child Welfare Information Gateway. (2017). Supporting brain development in traumatized children and youth. Washington, DC: U.S. Department of Health and Human Services, Children's Bureau (<https://www.childwelfare.gov/pubpdfs/braindevtrauma.pdf>).

- connection to country
- culture including strengthening women and children's capacity to renew and maintain strong relationships to their cultural heritage, identity and values and participate in practices that enable them to exercise their cultural rights and responsibilities
- family and community healing focus that strengthens families, extended kinship networks and communities, and renewing relationships of caring, sharing and narrative story-making
- a focus on mind, body, and emotions this may include physical and sensory health and wellbeing, and supporting emotional wellbeing
- Indigenous pedagogy and de-colonising practices, and
- Spirituality including empowering women and children's connection to their chosen spirituality and spiritual identity as defined by them
- analysis of the proposed site or location to ensure not only proximity (as per Criterion 1 Demand and Location) but also accessibility and availability (including a consideration of waitlist times) of appropriate additional support services for First Nations women and children.

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

**yourtown** recommends that the Australian Government Department of Social Services consider whether an applicant has engaged in a process of consultation and can demonstrate evidence of such consultation with CALD women and children to better understand their specific supports needs.

**yourtown** recommends the following additional criteria should be considered when determining the suitability of an applicant, and whether their service:

- will provide access to education and support, in a way that is accessible, understandable, and relevant in the local CALD community context, to assist the users of the service to understand and identify what is domestic and family violence, and their rights under the law<sup>4</sup>
- has considered how the proposed site or location will ensure not only proximity (as per Criterion 1 Demand and Location) but also accessibility and availability (including a consideration of waitlist times) to appropriate additional support services for CALD women and children
- provides 'soft entry' to developing language and occupational skills and programs aimed at increasing social connectedness<sup>5</sup>
- has a service model designed to work with women and their children to support healing, and repairing of relationships/tension between adult residents and their children
- has support mechanisms in place to manage immigration concerns. For example, the fear of deportation is particularly relevant to CALD women on visas sponsored by their partners
- has support mechanisms in place address a lack of financial resources in order to meet basic primary needs including access to medical and legal assistance. For example, financial and emotional support for women on temporary visas leaving an

---

<sup>4</sup> Evidence strongly supports that women in CALD communities do not recognise/respond to domestic violence, nor understand their legal rights. See Lu, M., Mangahas, X. & Nimmo, J. (2020). 'Domestic and Family Violence in Culturally and Linguistically Diverse (CALD) Communities', Pro Bono Centre -The University of Queensland and South's Community Hub Inc. ([Domestic and Family Violence in Culturally and Linguistically Diverse \(CALD\) Communities \(Uq.edu.au\)](https://www.probono.org.au/research-and-publications/domestic-and-family-violence-in-culturally-and-linguistically-diverse-cald-communities)).

<sup>5</sup> *ibid*

- abusive relationship, where they have suffered financial abuse and social isolation, and have limited informal support from their communities and extended families, and
- has social and wellbeing support to support CALD women who have been subjected to cultural and religious shame to pressure them to remain with their partner.

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

**yourtown** recommends the following additional criteria be included:

- analysis of the proposed site or location to ensure not only proximity (as per Criterion 1 Demand and Location) but also accessibility and availability (including a consideration of waitlist times) of appropriate additional support services for women and children with a disability
- engagement in a process of consultation and evidence of such consultation with women and children with a disability to better understand their specific supports needs, and
- evidence of an intersectional lens within the service model and service delivery plan which recognises that disability interplays with other personal and social factors that impact on both the experience of disability and experiences of domestic and family violence.

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

Section 4.3. Proposed Definitions should be strengthened to include definitions of critical terms used to define 'emergency accommodation, a 'safe place' and 'specialist service'. Lack of definitional clarity potentially facilitates only the lowest threshold to be applied particularly when evidencing how proposals address and/or classify their services as being 'rights-based', client-centred', 'trauma-informed' 'culturally appropriate' and 'having gender expertise'.

### **16. What advice/templates/checklist items would assist applicants in developing quality proposals?**

**yourtown** recommends the development of the following guidance notes and checklists to support applicants develop quality proposals:

- a comprehensive set of definitions for critical terms used in the definition of terms under Section 4.3. including 'rights-based', client-centred', 'trauma-informed' 'culturally appropriate' and 'having gender expertise' and guidance material on how applicants will be measured on the ability demonstrate evidence of such
- an assessment tool mapping the eligibility criteria against the four key identified areas of security, safety, privacy, and dignity to better understand how applicants measure against each, and
- guidance around an exclusionary criterion to ensure community organisations are not expending limited resources on developing proposals where they are automatic rule outs.

We would welcome the opportunity to explore these ideas with you in further detail. Should you require further information about any issues raised in the submission, please do not hesitate to contact Kathryn Mandla, Executive Head - Strategic Partnerships and Advocacy at **yourtown** via email at [kmandla@yourtown.com.au](mailto:kmandla@yourtown.com.au).