



Tasmanian Council of Social Service Inc

Under 16 Homelessness Policy Framework: Response to draft for consultation

July 2021



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COMPASSION
INFLUENCE

About TasCOSS

TasCOSS' vision is one Tasmania, free of poverty and inequality, where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry, and to change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to low-income Tasmanians living in vulnerable and disadvantaged circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage and promote the adoption of effective solutions to address these issues.

TasCOSS views are strongly informed by the expertise of our members and the lived experiences of the Tasmanians we represent. In preparing this response, we have drawn on consultations with key members as well as research and experience from other jurisdictions.

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Introduction

Thank you for the opportunity to provide feedback on the paper *Under 16 Homelessness – A Policy Framework for Tasmania* (the Policy Framework).

TasCOSS has had a long involvement in advocating for children and young people living in difficult circumstances in Tasmania. Our recent submission to the Tasmanian Child and Youth Wellbeing Strategy proposed twenty key actions to enhance child and youth wellbeing, including one action focussing specifically on homelessness:

Expanded youth accommodation facilities offering medium-to-long term housing and support to transition for young people, combined with expanded intensive case management, outreach support and family mediation for young people at the risk of homelessness.

TasCOSS commends the Tasmanian government, and members of the Under 16 Working Group for producing the ‘Draft for Consultation’ of the Policy Framework. The document provides a strategic overview of effort in this area and is evidence of government commitment to this highly vulnerable group of children. TasCOSS is particularly pleased that it has been substantially co-designed by a coalition of government and community sector representatives.

TasCOSS also commends the Under 16 Homelessness Taskforce (U16 Taskforce) for their comprehensive, considered and informed advice to the Minister on this critical issue.¹ Their ‘Ministerial Advice’ and recommendations provide a valuable foundation for building the Policy Framework and undertaking ongoing collaborative action to ameliorate child homelessness in Tasmania.

As the U16 Taskforce points out, the number of unaccompanied homeless children in Tasmania is relatively small. Using resources wisely and getting people working together across government departments and the community sector in the best interests of these children should not be beyond our capacity. Diverting children at risk of homelessness into more secure circumstances and guiding those who fall through the cracks towards a better future should not be beyond our means. While it may take increased investment of scarce resources in the short term and some wise planning, coordination and upskilling, surely this will have untold long-term benefits not only for the children concerned but for the Tasmanian community. We therefore welcome the Policy Framework as part of this effort and the opportunity to contribute to its development.

¹ Under 16 Homelessness Taskforce Ministerial Advice. [Ministerial-Advice-Background-Document-Final-24122019-Redacted-1.0.pdf](#)

Summary of Recommendations

TasCOSS believes that the draft Framework is a good starting point for our collective response to the needs of unaccompanied homeless children in Tasmania, but it currently lacks clarity in some respects and needs further articulation. Our response to the Policy Framework, which is detailed in the following section, calls for the following actions.

Oversight of responses to U16 homelessness

- The establishment of a secretariat (project team) to oversee implementation of Taskforce recommendations, the codesign of the service system, and monitoring of the implementation of the Policy Framework

Structural adjustments to the Policy Framework

We believe the Policy Framework should:

- Be based on the Anglicare SARC Public health approach to ending unaccompanied child homelessness in Tasmania
- Reflect the recommendations of the Under 16 Taskforce.

The Policy Framework should include:

- Commitment to ongoing implementation of the recommendations of the Taskforce, including those that are longer term
- Documentation of the roles and responsibilities of all parts of the system that have a role in responding to homeless children and a process for ensuring obligations are being fulfilled
- A Process Flowchart for responding to Under 16 homelessness (as included in the NSW Family & Community Services' Protocol for responding to Under 16 homelessness)
- Clarified vision, key policy principles and audience
- Clarification that government assumes ultimate responsibility and authority for unaccompanied homeless children
- Reference to agency responsibilities being mapped under the Child Youth and Wellbeing Outcomes Framework
- An outline of how the Policy Framework links with other key government initiatives.

Further detail regarding commitments

- The ARL to be a point of 'authority and accountability' and not only a point of 'contact and advice'

- Care Teams to be led by staff within the Department of Communities who are specialists in therapeutic care and have the authority and resources to fulfil this function
- Care Teams to be responsible for providing integrated triage and assessment based on the Child and Youth Wellbeing Framework and the Child and Youth Wellbeing Assessment Tool
- Further articulation of commitments to respond appropriately to individual risk factors and circumstances
- Clarification of commitments to provide prevention and early intervention services and review existing services
- Implementation of quality standards and consistent data collection
- Organisations to be made aware of the National Principles for Child Safe Organisations
- The developmental age of children rather than their chronological age to be prioritised in service responses
- ‘The best interests of the child’, beginning with any wishes expressed by the child, to be a primary consideration in family restoration
- Culturally appropriate support services for Aboriginal and Torres Strait Islander people that recognise the centrality of community to be established/engaged
- Staff to be trained/upskilled to respond appropriately to individual attributes/circumstances such as gender identity, disability, cultural and linguistic diversity, religion, developmental age, mental health conditions, addictions, etc
- Training and upskilling the existing workforce in trauma-informed, evidence-based practice
- It to be noted that SHS staff (who are not trained up or remunerated as specialist mental health workers) are not expected to assume sole responsibility for highly traumatised children with complex issues.

Additional commitments

- Immediate action on clarifying legislation and exploring potential legislative changes, as recommended by the Taskforce
- A community awareness-raising campaign to promote the concept that child homelessness is ‘everybody’s business’ and to educate the community on the broader role of the ARL
- Access to youth-oriented outreach primary health care services including mental health, general practice, and drug and alcohol rehabilitation noted as an essential component of any accommodation model
- The potential to collaborate with Primary Health Tasmania to develop clinical referral pathways for this cohort to be explored
- Provision for an immediate response to children in crisis

- Additional Child Safety and Wellbeing Liaison positions to be established in the North and North West
- The need for young people aged 16 and over to be transitioned into stable accommodation to be highlighted in the Policy Framework
- New data sharing mechanisms to be developed linking homeless data with child safety, health, education, and youth justice systems
- The establishment of place-based approaches in rural communities to be incorporated into the Policy Framework as a longer term commitment.

Response to the draft Framework by section

Our vision

TasCOSS agrees with the U16 Taskforce that while homelessness is a presenting issue for this cohort of children, this is a symptom of much deeper issues. As a society, we should not be accepting the existence of homeless children in our midst.

- *TasCOSS suggests a more aspirational vision: e.g., that no child in Tasmania should experience homelessness and live without the care of family, the State, and/or the community.*

Purpose

TasCOSS suggests:

- *The intended audience for the Policy Framework be spelled out in this section.*
- *The key policy principles underlying the Policy Framework are clarified and consolidated, either in this section or elsewhere in the document.*

The U16 Taskforce recommended a series of immediate and longer term initiatives. Only a few of these proposals have been adopted/adapted in the Policy Framework.

- *TasCOSS suggests that it be stated here that the Policy Framework only articulates immediate commitments to the safety and wellbeing of under 16 homeless children, with further consideration of the full range of actions proposed by the U16 Taskforce to occur at a later date, and longer term commitments to be progressively announced.*

Background

While TasCOSS has long been aware of issues relating to unaccompanied homeless children in Tasmania, our consideration of the Policy Framework was initially as a stand-alone document, and it was difficult to grasp its value and intent without first becoming familiar with the report of the U16 Taskforce and the Practice Guidelines that are proposed to accompany the Policy Framework. We note that the draft Practice Guidelines for Specialist Homeless Services have only been circulated to members of the Working Party and have yet to be released on the Department of Communities website.

- *TasCOSS believes that for the Policy Framework to have value and be understood by services, it needs to be articulated within the context of the recommendations of the U16 Taskforce and accompanied by the Draft SHS Guidelines along with a list of Practice Guidelines yet to be developed.*
- *TasCOSS considers that as essential background, the Policy Framework should include an outline/depiction of the roles and responsibilities of all parts of the system that have a role in responding to homeless children.*

Understanding the Context

This part of the Policy Framework provides a useful overview of the issues around under 16 homelessness in Tasmania, including the risk factors, gaps, and legislative barriers.

Risk factors

The risk factors noted in this section clearly point to the need for a ‘Coordinated Service System Response with Strong Governance and Accountability’ and a ‘Culturally Responsive’ system, as headlined later in the document.

- *TasCOSS would like to see more detailed commitment spelled out in the Policy Framework towards addressing the risk factors listed here – i.e., mental health, drug and alcohol, LGBTIQ+, Aboriginal children, children leaving institutional care, children with disability, and family issues of poverty, neglect, trauma and family violence – and how this will occur.*

Service gaps

Service gaps are outlined in this section, but the ‘Coordinated Service System Response’ section of the Policy Framework lacks detail about how these gaps will be filled. There is no mention, for example, of action underway to complete the northern Youth at Risk centre, extend the maximum length of stay in Youth at Risk Centres to 12 months, and commit \$10mill to an Under 16 Lighthouse Pilot Project.

- *TasCOSS applauds the government for these new initiatives, while noting some concerns that have been expressed in the community sector about an increased maximum stay in Youth at Risk centres potentially creating a service bottleneck, and some people suggesting that if children are deemed to be safely accommodated, other services might use this as a reason to withdraw their support. These concerns need to be acknowledged and mitigated.*

Decision Making Authority

The lack of a decision-making authority prescribed in legislation for children who are unaccompanied, homeless, and not under the care of the State is eloquently described in the Policy Framework but given this legislative ambiguity, clear direction as to where authority should lie is missing from the ‘Coordinated Service System Response’. The absence of anyone assuming responsibility for unaccompanied children is a primary issue for services trying to respond to their needs and this issue is frequently raised by TasCOSS members. Without this authority, it is difficult for young people, and the services that support them, to access health care, mental health support, or financial assistance. Children who are not connected into any support services are even more disadvantaged.

The Under 16 Taskforce stated that:

The Tasmanian government... has an obligation as outlined in international conventions, national frameworks and state legislation, as well as a moral imperative to provide children with care, protection and a stable home environment.

... It is evident that no one government agency can address the challenges associated with these children; but together with parents, government still needs to be accountable and have responsibility for addressing their wellbeing and care needs.

... The provision of a clear authorising environment, with defined and enforceable accountabilities, ensures vulnerable children who are homeless do not fall through

*the gaps between services and that there is ultimately someone who is accountable for ensuring their wellbeing.*²

- *TasCOSS believes that government must assume ultimate responsibility and authority for unaccompanied homeless children, and this should be made clear in the Policy Framework.*
- *TasCOSS advocates for immediate action on clarifying legislation and exploring potential legislative changes, as recommended by the Taskforce.*
- *While deliberations continue about in loco parentis and the role of the State, TasCOSS calls for an immediate government response to children who are in crisis – to include temporary accommodation and mental health support.*

Our Shared Responsibility

Principles underpinning the Policy Framework

A policy framework generally provides a set of clearly articulated principles and goals that form the basis for the development of guidelines and give overall direction for planning and development. The legislative and rights-based principles and Tasmanian Child and Youth Wellbeing principles referenced in the Policy Framework are non-specific to the U16 homeless cohort.

- *TasCOSS believes a clear set of principles specifically honed to this group and to the Tasmanian context would be useful.*

In Appendix 8 of its Ministerial Advice, the Under 16 Taskforce drafted a set of principles outlining rights of children and families (including the right to be cared for by a responsible individual/authority) that were recommended for endorsement by government.

- *To this list, TasCOSS suggests the addition of principles aligned with the statements of intent documented further on in the Policy Framework under prevention and early intervention, developmentally appropriate responses, family restoration, a coordinated service system, a child-centred response, culturally appropriate and inclusive services, and a skilled responsive workforce. We would also like to see the inclusion of a principle reflecting mutual respect and collaboration across agencies and sectors responding to children who are homeless.*

A public health approach, traditionally employed in the health arena, is increasingly being applied to other social issues, including homelessness. While this approach is noted in the Policy Framework, it does not underpin its structure. A public health approach is a connected systems approach that focuses on primary, secondary and tertiary prevention strategies. The NSW and WA Commissioners for Children define 'A public health approach to designing a homelessness service model as:

... a joined up model' reflecting the complexity and diversity of the systems and drivers across the homelessness continuum. Mechanisms which foster cross sector

² Under 16 Homelessness Taskforce Ministerial Advice. [Ministerial-Advice-Background-Document-Final-24122019-Redacted-1.0.pdf](#). pp 5, 7.

shared responsibility [are] required to deliver a significant prevention effort and to achieve significant reductions in homelessness...'³

A public health model specifically focussed on ending unaccompanied child homelessness in Tasmania has been developed by Catherine Robinson of Anglicare's Social Action Research Centre.⁴ This model encompasses universal responses, targeted responses, immediate intensive responses, and longer term responses to unaccompanied child homelessness and is strongly aligned with the work of the Under 16 Taskforce.

- *TasCOSS strongly recommends the adoption of this model as a basis for the Policy Framework. It provides a sound, cohesive structure and succinct guidance for future planning and collaborative action.*

Our commitment for a better response

Prevention and early intervention

TasCOSS welcomes the focus in the Policy Framework on investment in prevention and early intervention. These are key aspects of a public health approach, and have been demonstrated to have significant cost-savings (see, for example, the Commissioner for Children and Young People (CCYP) report, *Investing in the Wellbeing of Tasmania's Children and Young People*⁵). However, TasCOSS considers that the commitments listed in this section lack specificity.

Provide services that strengthen family connections

As an extensive network of services designed to strengthen family connections already exists in Tasmania, TasCOSS questions what additional commitments are being made.

- *TasCOSS would like information on any proposed new early intervention services, or extra resources allocated to expand existing services.*
- *TasCOSS considers that a listing of **prevention/early intervention services** relevant to under 16 homelessness would be a useful adjunct to the Policy Framework, in particular: the services that are the responsibility of Department of Education (DoE) – e.g. Child and Family Centres, school-based programs such as Launch into Learning, and social worker support; those that are the responsibility of Department of Health (DoH) – e.g., Midwifery Antenatal Clinics and community outreach, Child and Family Health Services, Parenting Services, community social work; those that are the responsibility of the Department of Communities (DCT); and those provided by the community sector.*

³ A Joint Submission from the NSW Commissioner for Children and Young People and the WA Commissioner for Children and Young People to the Australia Government Green Paper, 'Which Way Home?' <https://www.ccyp.wa.gov.au/media/2150/submission-to-the-australian-government-green-paper-a-new-approach-to-homelessness.pdf>

⁴ Robinson, Catherine. SARC's Social Action Series #1 – A public health approach to ending unaccompanied child homelessness in Tasmania. <https://www.anglicare-tas.org.au/research/sarcs-social-action-series-1-a-public-health-approach-to-ending-unaccompanied-child-homelessness-in-tasmania/>

⁵ Commissioner for Children and Young People Tasmania, 2020. Investing in the Wellbeing of Tasmania's Children and Young People, Hobart: <https://www.childcomm.tas.gov.au/wp-content/uploads/Investing-in-the-Wellbeing-of-Tasmanias-Children-and-Young-People.pdf>

Reviewing existing services to better respond to and prevent youth homelessness

TasCOSS agrees on the need for service review but would like more detail in the Policy Framework regarding this commitment.

- *TasCOSS would like more information on what services are to be reviewed, when, how, by whom, and according to what criteria.*
- *To ensure they are responding to and preventing youth homelessness, TasCOSS calls for the implementation of quality standards such as the National Principles for Child Safe Organisations.⁶*

Recognising key points of interaction across service systems and identifying children at risk of homelessness

TasCOSS agrees that identifying children at risk of homelessness at key points of interaction with services (such as DoE, Tas Police, homelessness services, CYFS, OOHC, Family-Based Care, or other care, and CAMHS) is critical if children and/or their families are to be connected into appropriate support. However, the Policy Framework does not indicate how agencies and services will commit to this role, or how they will screen children to identify their risk of homelessness.

- *As mentioned above, TasCOSS believes that the Policy Framework should include an outline/depiction of the roles and responsibilities of all parts of the system that have a role in responding to homeless children, and a process of accountability to ensure they are fulfilling these obligations*
- *TasCOSS believes that a standardised process is required across the system to ensure quality, consistency, and the integrity of data collection. We note that other jurisdictions use screening tools such as the Geelong 'COSS' model referred to by the Taskforce, to good effect.⁷*

In addition to the commitments outlined in the Policy Framework around prevention and early intervention:

- *TasCOSS believes that there should be a 'whole of community' awareness-raising campaign to inform the Tasmanian community about the issue of under 16 homelessness and to promote the concept that this is 'everybody's business'.*

Developmentally appropriate responses

Teenage children vary widely in their capacity for self-care and self-efficacy. Children who are homeless often have behavioural and/or mental health conditions that affect their developmental age.

TasCOSS believes that:

- *The **developmental age of children**, not just their chronological age, should be considered in responding to their needs **AND this should take precedence over their chronological age.***

⁶ The National Principles for Child Safe Organisations: An initiative of the Council of Australian Governments [National Principles for Child Safe Organisations \(humanrights.gov.au\)](https://www.humanrights.gov.au/national-principles-for-child-safe-organisations)

⁷ *Community of Schools and Services (COSS) approach to homelessness early intervention and prevention.*
<https://www.qyhc.org.au/media/community-of-schools-and-services-coss-community-of-practice/>

- *A range of innovative models providing medium/longer term care and accommodation should not only be explored, but should also be implemented to cater for the broad variation in needs presenting by this cohort of homeless children.*

TasCOSS notes that Primary Health Tasmania has recently conducted research on homelessness and access to primary health care services and the need for unaccompanied children and young people to have ready access to flexible, low cost, drop-in and outreach primary health care services was highlighted.

TasCOSS considers that:

- *Access to a range of youth-oriented outreach primary health care services including mental health, general practice, and drug and alcohol rehabilitation, is an essential component of any accommodation model.*

Family restoration

- *TasCOSS endorses the focus on family restoration and agrees that children should remain or return to the care of parents or other family 'wherever possible and safe' [but would add] and in the best interests of the child, beginning with any wishes expressed by the child.⁸*

A Coordinated Service System Response with Strong Governance and Accountability

A single point of contact and advice

TasCOSS members and the community sector have clearly expressed the view that the Tasmanian Government should be accountable for homeless children who have no responsible parent or guardian and who are not part of the Child Safety system.

- *TasCOSS endorses the establishment of a single point of reference within the Department of Communities, but prefers the language of the U16 Taskforce – [that the Tasmanian Government] immediately establish a point of 'authority and accountability' rather than the more indeterminate point of 'contact and advice' referenced in the Policy Framework.*

A single front door for advice, assessment and referral through the ARL

- *TasCOSS endorses this commitment, and notes that ARL staff may require training (as proposed by the Taskforce), increased capacity, specific intake/assessment processes, and referral protocols with the homelessness sector and community support sector to undertake this role.*
- *TasCOSS believes that 'educating the community on the broader role of this [ARL] service' (as recommended by the Taskforce) will be critical to its success. This should be part of the whole-of-community awareness-raising campaign mentioned above.*

Trialling a dedicated Child Safety and Wellbeing Liaison position in the ARL

- *TasCOSS considers this to be a much-needed role and strongly advocates for additional positions to be established in the North and the North West of the state.*

⁸ As required under the *Family Law Act 1975*. See Australian Law Reform Commission [The best interests principle | ALRC](#)

Trialling a 'Care Team' approach to improve support for this cohort

- *TasCOSS believes that well-coordinated and resourced Care Teams are necessary to achieve a wraparound, child-centred model of care that is so essential to the wellbeing of unaccompanied homeless children and those at risk of homelessness.*
- *TasCOSS believes that Care Teams need to be led by staff within the Department of Communities who are specialists in therapeutic care and have the authority and resources to fulfil this function.*
- *As proposed by the Taskforce, Care Teams should be responsible for providing 'an integrated triage and assessment system based on the Child and Youth Wellbeing Framework'. As triage and assessment require specific skills, these functions should sit within Communities Tasmania, with the Child and Family Wellbeing Assessment Tool used to promote consistent assessment.*

Develop a set of Practice Guidelines to support evidence based practice and clarify roles and responsibilities across relevant parts of the service system

TasCOSS notes that SHS Practice Guidelines have been developed and separate Guidelines are planned for the Department of Health and the Department of Education, and other government agencies.

- *In addition to agency/sector-specific Practice Guidelines, TasCOSS believes that there is a critical need for **documentation of the roles and responsibilities of all parties likely to have some involvement in the care and support of unaccompanied children.** This should include processes for collaboration and information-sharing, including the sharing of data.*

A child-centred response

- *TasCOSS agrees that the rights and best interests of a child should lie at the heart of any response to their needs and, wherever possible, the child should be involved in decisions affecting them. **Use of the Child and Youth Wellbeing Assessment Tool⁹ could help ensure that an unaccompanied child 'is an active participant in their own life' and is 'able to have a say and have their opinion heard and valued'.***

Culturally responsive

- *TasCOSS agrees that responses to unaccompanied Aboriginal children must recognise the centrality of community in maintaining connections to family, culture and country and agrees with the establishment/engagement of culturally appropriate support services for Aboriginal and Torres Strait Islander people.*
- *TasCOSS believes that responses to unaccompanied children must take account of other individual attributes/circumstances such as gender identity, disability, cultural and linguistic*

⁹ The Child and Family Wellbeing Assessment Tool (jointly developed by DoE, DoH and DCT)
https://www.strongfamiliesafekids.tas.gov.au/__data/assets/pdf_file/0016/5551/3-Child-and-Family-Wellbeing-Assessment-Tool.pdf

diversity, religion, developmental age, mental health conditions, addictions, etc and ensure staff are skilled to respond appropriately to such diversity.

Promoting a quality and skilled workforce

- *TasCOSS agrees that services and support must focus on child wellbeing within a trauma-informed, evidence-based practice framework, but believes that more effort is needed in training and upskilling the existing workforce in this area.*
- *TasCOSS is also aware that SHS staff are not trained as specialist mental health workers, or remunerated for this role and cautions that it is not realistic for them to assume sole responsibility for highly traumatised children with complex issues.*
- *TasCOSS believes that organisations and their workforce should be made aware of the National Principles for Child Safe Organisations and how these can be applied to their organisation and work practice.*

Other proposed inclusions in the Framework

Appropriate governance and reporting requirements

The U16 Taskforce called for agreement on appropriate governance and reporting requirements for implementing the U16 Taskforce recommendations. It also recommended the establishment of a secretariat to oversee the codesign and implementation of the service system.

- *While recognising the resources required to support these recommendations, TasCOSS believes that the establishment of a limited-term secretariat (project team) to oversee implementation of Taskforce recommendations and the codesign of the service system would have long term benefits and cost-savings for the Tasmanian Government and the Tasmanian community.*

The secretariat could also be accountable for monitoring the implementation of the Policy Framework.

Data sharing

The U16 Taskforce proposed the establishment of ‘new mechanisms to improve data sharing and collaboration across government and community sectors’ building on the work undertaken as part of the Kids Come First initiative and the Housing Connect SHIP data system.

- *TasCOSS believes that robust data is required to monitor the extent of youth homelessness in the Tasmanian community, to provide targeted services, and to monitor outcomes in this area. Homeless data needs to be linked with child safety, health, education, and youth justice systems. New technologies are enabling data linkage previously unheard of and the potential for these systems to be used to support Tasmanian children needs to be exploited as part of a collaborative response.*

Integrated case management

TasCOSS believes that:

- *A linked database with appropriate security and access across relevant service systems could enable children at risk of homelessness and lack of care to be identified earlier and would facilitate **integrated case management** by Care Teams.*

Outcomes for unaccompanied children

TasCOSS endorses the development of the Child Youth and Wellbeing Outcomes Framework (to include outcomes assessment and reporting models) as a tool to measure progress against key indicators.

- *TasCOSS believes the Child Youth and Wellbeing Outcomes Framework should be referenced in the Under 16 Policy Framework as a means to ensure commitment of agencies to child and youth wellbeing, and to hold them accountable for delivering services that improve the wellbeing of children and young people.*

Service entry points

The U16 Taskforce and the Policy Framework provide ample evidence that many unaccompanied homeless children are not connected into any support services.

TasCOSS is aware of people outside of the traditional community services and homeless sector that may connect with children who are homeless or at risk of homelessness – e.g. general practitioners, community/local government workers, people in service clubs, friends, neighbours etc.

- *TasCOSS believes that as part of an awareness-raising campaign, clear information on the role of ARL and the Child Safety system regarding children at risk of homelessness and when and how to refer to ARL should be circulated widely in the community.*
- *The potential to collaborate with Primary Health Tasmania and develop clinical referral pathways for this cohort could be explored.*

Service exit points

The Policy Framework does not clarify how children can exit out of homelessness. There is no mention of children being picked up by the Child Safety system and then having access to Out of Home Care, although referral to the ARL would assume that this option would be considered.

- *TasCOSS suggests that the Policy Framework includes a Process Flowchart as included in the NSW Family & Community Services' Protocol for responding to unaccompanied children and young people 12– 15 years of age who are homeless or at risk of homelessness.¹⁰*

While the policy for Youth at Risk Centres states that children should not be exited into homelessness when they turn 16, there is no reference to this critical transition point in the Policy Framework. TasCOSS is aware of children in the 15-16 age bracket being exited out of youth shelters into homelessness, and others in their mid-teens who were homeless and tried to access Out of Home Care via Child Safety Services but were turned away because they were 'considered to be self-sufficient'. There is no commitment in the Policy Framework to ensuring that unaccompanied homeless children who are not based in a centre or under a Care and Protection Order will be regarded as a government responsibility once they turn 16.

- *TasCOSS believes the Policy Framework should refer to the need for young people aged 16 and over to be transitioned into stable accommodation if under 16 options are no longer available to them, and that clear pathways and support systems should be established.*

A whole community response

Primary health care services that can be accessed by this cohort and respond appropriately to them are desperately needed as part of a wrap-around response. Primary Health Tasmania has shown interest in this area. There is also room for service organisations and business involvement. As previously

¹⁰ Family & Community Services, NSW. Protocol for responding to unaccompanied children and young people 12–15 years of age who are homeless or at risk of homelessness. P 24.

suggested, a community awareness campaign could elicit more support and appropriate referrals for this cohort.

- *TasCOSS believes that while the Tasmanian Government has overall responsibility for unaccompanied homeless children, the need for a whole community response, facilitated by a community awareness-raising campaign, should be referenced in the Policy Framework.*

Local responsiveness

Despite a population drift in Tasmania from rural areas to cities, Tasmania continues to have a highly dispersed population. The lack of services in rural communities is well-documented. Unaccompanied young people living outside of major urban centres have little or no access to support.

The Under 16 Taskforce pointed to the need for innovative place-based approaches to homelessness among children.

Place based approaches join up the efforts of all stakeholders (community, industry, business, NGOs and government) to improve the social, economic and physical wellbeing of a defined geographical location. They can reduce the impact of social disadvantage at the local level, decrease barriers to accessing services and help to prevent the cycle of intergenerational disadvantage.¹¹

- *TasCOSS would like to see the U16 Taskforce recommendation for Government service commissioning to enable ‘...a demand driven, flexible client-centred and place-based approach with appropriate outcomes and impact measurement’¹² reflected in the Policy Framework. We believe local solutions are needed to care for Tasmania’s children and address the intractable issue of child homelessness.*

Further action

The Policy Framework does not provide any detail regarding how it will be implemented and how this implementation will be monitored. As noted above,

- *TasCOSS endorses the establishment of a secretariat/project team to oversee implementation of Taskforce recommendations, the codesign of the service system, and monitoring the implementation of the Policy Framework.*

¹¹ Under 16 Homelessness Taskforce Ministerial Advice. [Ministerial-Advice-Background-Document-Final-24122019-Redacted-1.0.pdf](#), p 38.

¹² Ibid. p 49.

Conclusion

While the number of homeless unaccompanied children appears to be relatively small in Tasmania, those who are identified are only part of the problem. There are many homeless children in our community who are not in any official tally. As the Policy Framework highlights, without intervention these children are likely to continue on a pathway of ongoing disadvantage and dependence on social support.

Not only do we have a moral imperative to assist these children, but we also have an opportunity to break the cycle of entrenched disadvantage. This warrants a strong sense of urgency and a focus of resources. As the U16 Taskforce stated, 'the problem is solvable'. The Policy Framework is an important part of this solution and TasCOSS welcomes efforts to get this right and be responsive to the views of the organisations we represent.

As part of the government's commitment to children and young people, TasCOSS welcomes Minister Courtney's announcement of new youth wellbeing officer positions for the Advice and Referral Line, and the commitment of \$10m for the Under 16 Lighthouse Pilot Project for children under 16 who are not in the care of the state and unable to live at home. We look forward to receiving more advice on this initiative and how it will be rolled out.

TasCOSS commends the Policy Framework as a basis for further discussion and looks forward to its further iteration in response to the feedback you receive on this draft document. We will welcome further information on action being taken and further opportunity to be involved in shaping responses to this important issue.