

## 15.3 Review of Policy 113 Homelessness - the Town's Role

<b>Location</b>	Town-wide
<b>Reporting officer</b>	Community Development Officer – Families, Youth and Homelessness
<b>Responsible officer</b>	Manager Community
<b>Voting requirement</b>	Simple majority
<b>Attachments</b>	<ol style="list-style-type: none"><li>1. FINAL Report - To VP Homelessness Policy FINAL AUG [15.3.1 - 64 pages]</li><li>2. Policy 113 Homelessness The Town's role tracked changes [15.3.2 - 5 pages]</li><li>3. Policy 113 Homelessness The Town's role revised policy changes accepted [15.3.3 - 5 pages]</li></ol>

### Recommendation from the Policy Committee:

That Council adopts the amended Policy 113 - Homelessness as per attachment 3; subject to inserting the following words at the start of clauses 10 and 11 to read as "Subject to compliance with any requirements of privacy legislation and confidentiality,".

## Purpose

For Council to consider the draft revised Council Policy 113 Homelessness – The Town's Role (Policy 113) following targeted consultation.

## In brief

- A review of Policy 113 – Homelessness – The Town's Role was requested by Council at the June 2021 Ordinary Council Meeting.
- Shelter WA was engaged to complete the Policy review.
- An amended Policy 113 has changes tracked in response to consultation with local homelessness and related service providers, Elected Members and Town staff.
- Amendments proposed to the Policy 113 include specific mention of Elected Members in the Scope, policy commitments for partnership and collaboration with local services, data collection to include housing growth and diversity and local housing needs and trends, training for frontline staff and reference to the business community to reflect the impact of homelessness and businesses' needs in the space.

## Background

1. At the 16 June 2020 Ordinary Council Meeting (CR 436/2020), Council resolved to adopt Policy 113 Homelessness –The Town's Role, replacing the existing policy adopted at the Ordinary Council Meeting on 13 December 2016.
2. Policy 113 was reviewed internally in 2021. At the Ordinary Council Meeting on 15 June 2021, Council resolved to request the Chief Executive Officer to review Policy 113 by June 2022 and report the outcome of the review to Council (CR 125/2021).
3. Due to staffing constraints experienced by the consultant engaged to complete the review, Shelter WA, the review was delayed. This delay was communicated to Council through an Elected Member portal post in mid-May 2022 and through item 12.3 at the Ordinary Council Meeting held on 21 June 2022. At this time Council acknowledged the delay to the policy review (CR 123/2022).

4. Shelter WA carried out the review between May to July 2022, including workshops with Elected Members, local service providers and Town staff.
5. The policy's objective is to guide the Town's commitment to addressing homelessness.
6. Given that a scope of the policy review was provided to Shelter WA early in 2022, and that the policy review commenced in May 2022, the Town's newly introduced Evaluation of a Policy requirements do not apply to this review.

## Strategic alignment

Community priority	Intended public value outcome or impact
S1 - Helping people feel safe.	Providing support to those experiencing homelessness through a compassionate approach from Town staff, ensuring public spaces and amenities are safe and inclusive and liaising with appropriate outreach, will promote their personal safety and reduces broader community concerns about safety.
S2 - Collaborating to ensure everyone has a place to call home.	The overall aim of Policy 113 is to end homelessness, and the policy objectives include methods for the Town to support this aim, including collaborating with service providers and internal Town stakeholders to achieve this goal.

## Engagement

Internal engagement	
Communications	The team suggest that information for local businesses would be useful, such as an appropriate toolkit.
Leisure facilities	No changes required for the policy
Place Planning	The Local Planning Strategy includes an action to investigate the Town's role in provision of affordable housing, local demand and planning and non-planning mechanisms to increase affordable housing and what is feasible given limited resources and the cost of providing housing.
Community Development – Safer Neighbourhoods	No changes required for the policy
Community Development – Families, Youth and Homelessness	Feedback incorporated into this report, and within Policy 113 tracked changes.
Libraries	No changes required for the policy
Events	No changes required for the policy
Property	An audit was undertaken into Council owned land and buildings that could be

Development and Leasing	<p>suitable for social housing, with the outcome of that audit reported to OCM on 15 February 2022. Elected members may wish to refer to the analysis in the OCM report, which goes into some detail as to the Town's position and how it could facilitate social housing.</p> <p>The audit established that there are no Council owned buildings that are suitable for social housing and a small number of land parcels that may be suitable. Any provision of social housing on Council owned land is likely to be modest in terms of the number of homes provided and will not resolve large scale homelessness within the Town's area. There may however be niche areas such as social housing for special needs or disability where the release of a small number of Town owned properties will have a relatively large impact.</p> <p>Council resolved as follows by resolution 9/2022:-  <i>That Council:</i></p> <ol style="list-style-type: none"> <li><i>1. Notes the report and defers any decision on selection of property for the development of social housing, pending the outcome of the review of the Town's Land Asset Optimisation Strategy.</i></li> <li><i>2. Request the Chief Executive Officer to liaise with the Department of Communities (Housing and Assets) to further investigate the proposed terms of a ground lease transaction structure for the provision of social housing.</i></li> </ol> <p>The selection of (Council owned) property for social housing has therefore been deferred accordingly.</p>
Parking and Rangers	<p>The team requested that any support information provided to people experiencing homelessness is available in various formats to ensure a clear understanding through consideration of accessibility, inclusion and varying literacy levels.</p>
Elected Members	<p>Involved via the workshops and opportunity to provide direct input, as outlined below.</p>

External engagement	
Stakeholders	Feedback was received from local homelessness service providers and Town Elected Members
Period of engagement	External engagement was carried out through two workshops, one held online on 13 June 2022, and one held in person on 6 July 2022.
Level of engagement	2. Consult
Methods of engagement	Two workshops, one online and one in-person. Direct contact was made with agencies who expressed interest in providing feedback but were unable to attend the workshops.

Advertising	Local service providers, Elected Members and local businesses were invited by direct email. Businesses were also invited through the Town's business e-newsletter.
Submission summary	<p>Attendees at workshops:</p> <ul style="list-style-type: none"> <li>• Online Workshop – Mayor Karen Vernon, Cr Jesse Hamer, Star Street Church, Uniting WA, and Headspace Cannington.</li> <li>• In-person Workshop – Cr Wilfred Hendricks, Cr Peter Devereaux, Sussex Street Community Law Centre, Victoria Park Youth Accommodation, Connect Victoria Park, and Mission Australia.</li> <li>• Direct contact with agencies unable to attend the workshops – Ruah Community Services, WA Alliance to End Homelessness.</li> </ul>
Key findings	<p>The matters raised through the workshops included:</p> <p><i>Policy objective</i></p> <ul style="list-style-type: none"> <li>• The term "Recognising" may not give enough direction or strength to the role the Town can take. Consider strengthening this.</li> <li>• The policy objective does not mention prevention, but the Town can play a role here.</li> </ul> <p><i>Policy scope</i></p> <ul style="list-style-type: none"> <li>• Inclusion of Elected Members in the policy scope.</li> <li>• Inclusion of all functional areas of Council, not just areas where it affects or relates specifically to homeless programs.</li> <li>• Widening its applicability to be an embedded approach that includes prevention, as it is currently quite open to interpretation.</li> <li>• The scope doesn't incorporate housing in any real way.</li> <li>• Including services that receive funding from Council.</li> <li>• Carry through the goal of ending homelessness from the objective.</li> </ul> <p><i>Policy principles</i></p> <ul style="list-style-type: none"> <li>• The need for respect to be included as a policy principle.</li> <li>• The need for a whole of community approach to be recognised across the policy.</li> <li>• Ensuring that the policy is applied comprehensively across the Town's activities.</li> </ul> <p><i>Policy commitments</i></p> <ul style="list-style-type: none"> <li>• Strong inclusion of housing and the urban planning function (consistent with the principle of right to housing) as a policy commitment.</li> <li>• Coordinated and collaborative advocacy beyond the Town.</li> <li>• Incorporate the business community into the education, awareness and implementation.</li> <li>• Direct support that is proactive and in-keeping with need.</li> <li>• Inclusion of housing data in collection and a clear statement around what the data will be used for.</li> </ul>

## Legal compliance

Not applicable.

## Risk management consideration

Risk impact category	Risk event description	Consequence rating	Likelihood rating	Overall risk level score	Council's risk appetite	Risk treatment option and rationale for actions
Financial	N/A				Low	
Environmental	N/A				Medium	
Health and safety	N/A				Low	
Infrastructure/ ICT systems/ utilities	N/A				Medium	
Legislative compliance	N/A				Low	
Reputation	That the Town appears not to be involved in addressing Homelessness.	Moderate	Unlikely	Medium	Low	TREAT through continuing to review and implement the Homelessness Policy and associated Implementation Plan
Service delivery	N/A				Medium	

## Financial implications

<b>Current budget impact</b>	Sufficient funds exist within the annual budget to address this recommendation.
<b>Future budget impact</b>	Funds to continue to undertake actions within the Homelessness Policy Implementation Plan July 2020 – June 2023 have been allocated in the Town's 2022-2023 budget.

## Analysis

7. The review process involved:
  - (a) Engaging a suitably qualified and experienced third party to undertake the review (Shelter WA).
  - (b) Understanding the drivers of homelessness and the evidence-based response.
  - (c) Understanding the role outlined for local government in the National Housing and Homelessness Agreement and All Paths Lead to a Home: Western Australia's 10-year Strategy on Homelessness (2020-2030) and local governments general competency powers.
  - (d) Alignment with the Town of Victoria Park's vision and mission, and Strategic Community Plan 2022-2032, effective from 1 July 2022.

- (e) Desktop review of four Western Australian local government policies and action plans related to homelessness.
  - (f) Input from prior engagement undertaken by the Town of Victoria Park during the development of the current policy.
  - (g) Targeted input from local service providers and Council staff on the strengths and gaps in the current policy.
  - (h) Review by Town staff of Shelter WA recommendations, and integration of this feedback into the proposed revised Policy 113.
8. Further information on the review process is included in the Shelter WA report - *Attachment 1 – Review of the Town of Victoria Park Homelessness Policy Report*.
  9. Recommended changes arising from the review of Policy 113 have been integrated in *Attachment 2 – Policy 113 with tracked changes* (Shelter WA changes marked in RED); and *Attachment 3 – Policy 113 with changes accepted*.
  10. A summary of recommended changes to Policy 113, and the reason for consideration have been provided in the table below.
  11. A key recommendation from the policy review is that the term “people experiencing homelessness” is used instead of “homeless people”. People-first language is defined as language that puts a person before a diagnosis. By describing someone as “experiencing homelessness” rather than simply “homeless,” we are describing something a person is going through rather than defining them by it. The change from ‘homeless people’ to ‘people experiencing homelessness’ has been updated throughout the policy and is not identified separately in the table.

Clause	Proposed	Reason
Policy objective	The Town of Victoria Park acknowledges and recognises that it has a social responsibility to play an active role in preventing, minimising the impact of and ending homelessness in the community.	<p>Addition of a reference to Town ‘acknowledging’ social responsibility in addition to ‘recognising’. Workshop attendees requested this change to strengthen the wording.</p> <p>Addition of the Town’s responsibility to play a role in preventing homelessness, in response to workshop feedback.</p>
Policy scope	This policy applies to Elected Members, Town staff, contractors, consultants, working groups, services that receive funding or grants from Council and committees of Council who are delivering services or working on any project across all areas of the Town of Victoria Park.	<p>Addition of Elected Members and services that receive funding or grants from Council as having the policy apply to them. Although it may be understood that Elected Members are included in a policy, they are added to mitigate all doubt.</p> <p>Removes reference to the policy applying to a program only affecting or relating to homelessness and adds in that the policy covers committees of Council who are delivering services or working on any project</p>

		across all areas of the Town. This is due to the broad reach of homelessness, to ensure that it is considered in all projects, even if the impacts of the project on homelessness are not initially recognised.
Policy definition	Cultural definition of homelessness added. Definitions of the 'By Name List', 'Social and Affordable Housing' and 'Crisis Accommodation' added. Updated definition of 'At risk of homelessness'.	Addition of Mackenzie and Chamberlain (1992) cultural definition of homelessness, which is widely used across the community sector. Additional definitions provided to assist clarity and consistency of understanding. Addition of other risk factors for becoming homeless: people living with disability, young people and older people on income support who rent privately.
Policy principles	2. Respect: The Town will have due regard for the feelings, needs and rights of people who experience homelessness.	Added Respect as a policy principle, given feedback that this needed to be highlighted and not only included in the 'Compassion' principle.
Policy principles	3. Inclusiveness: The Town encourages and promotes inclusive access to public spaces and amenities, acknowledging the rights of people experiencing homelessness, whilst also acknowledging the responsibility of all community members to respect the rights of others to live in a safe and peaceful environment.	Changed previous principle 'Access to public spaces' to 'Inclusiveness', which is better understood as a policy principle.  Addition and acknowledgement of rights of people experiencing homelessness.

Policy principles	<p>5. Partnerships and Collaboration: The Town acknowledges that ending homelessness requires a committed, whole-of-community response. The Town will work in partnership and collaboratively with all levels of government, homeless support services, business, community organisations and neighbouring local governments towards a coordinated, effective and evidence-based approach to ending homelessness in the local community and the greater inner City region.</p>	<p>Changed previous principle 'Whole of community response' to 'Partnerships and Collaboration' to enhance the importance of collaborating with government, services, business and community organisations. Business is added as one of the organisations the Town will work with given their interaction with people experiencing homelessness in the Town.</p> <p>Added that the approach will be evidence-based as a policy principle, not just a policy commitment, to ensure that strategies and plans that will sit under the policy are informed by the evidence related.</p>
Policy commitments	<p>8. The Town will work with community organisations to build their capability and capacity to contribute to preventing and to ending homelessness through the funding and support mechanisms such as a community funding or grant program, access to or use of Council land or buildings, subsidised rent, and/or rate relief, and by facilitating partnerships and coordinating local action.</p>	<p>Added a range of activities that could be considered by Council to partner with and build the capacity of local services. This has been expanded to illustrate a number of ways that this could be progressed.</p>
Policy commitments	<p>10. The Town will collect and share accurate data, including utilising the By Name List, to understand, monitor and respond to trends regarding homelessness in the community.</p>	<p>Addition of a reference to the By Name List To align with the strengthened commitment of the Strategic Community Plan. The By Name List is maintained by external community services providers, accessible through a partnership arrangement.</p>
Policy commitments	<p>11. <i>Original wording:</i> The Town will collect and share accurate data on social and affordable housing trends and utilise mechanisms, including town planning policies, and will investigate affordable housing options as outlined in the Local Planning Strategy. <i>Correct proposed wording:</i></p>	<p>This commitment has been added given the role of housing in homelessness. Implementation should be linked to the Town's Local Planning Strategy. This will enable the policy to align with local government's role in the WA Strategy, to utilise land and assets to deliver on the policy objective of ending homelessness. Wording provided by Shelter WA has been updated in anticipation as the Town will preparing an affordable housing</p>



	The Town recognises the important role that a healthy supply of social and affordable rental housing plays in addressing homelessness and will investigate affordable housing options as outlined in the Local Planning Strategy.	study in the coming years.
Policy commitments	12. The Town will facilitate training for staff on how to respond with compassion, care and respect to people experiencing homelessness.	This commitment has been added to strengthen the policy and be consistent with delivering on the policy goal.
Policy commitments	13. The Town will seek to remove the capacity for any negative impacts on people experiencing homelessness through the scheduled review of local laws.	This commitment has been added to reflect the policy principles of compassion, respect and inclusivity. Wording provided by Shelter WA has been updated to ensure that this commitment is executed through the scheduled review of local laws, rather than committing to additional reviews.
Policy commitments	14. The Town will actively partner and collaborate with neighboring local governments, community services, local business, and the broader community to prevent and to end homelessness.	This commitment has been added given that partnerships are a key measure in the new Strategic Community Plan.
Policy commitments	15. The Town will engage in evidenced based advocacy with local, state and federal governments for a collaborative, coordinated approach to prevent and to end homelessness.	Addition that advocacy should be collaborative and coordinated with the aim of preventing and ending homelessness.
Policy commitments	16. The Town will raise awareness of the nature, impacts and challenges of homelessness and how the community, including local businesses, can play a part in minimising the impact of and preventing homelessness in the community.	Addition of reference to the business community given that homelessness can impact on local business and by mentioning them in the policy, they can see their needs reflected.

12. If these policy amendments are adopted, the Homelessness Policy Implementation Plan and associated Management Practice will be updated to reflect the associated changes.
13. It is recommended that going forward Policy 113 – Homelessness – The Town’s Role, and the Homelessness Policy Implementation Plan be reviewed once every two years.

## Relevant documents

[Policy 113 Homelessness – The Town’s role](#)  
[Homelessness Policy Implementation Plan](#)

## Further Consideration

14. Following the publishing of the agenda for Policy Committee scheduled for 22 August 2022, an error in Attachment 1 was identified prior to the Policy Committee meeting. The section of the report which references the Town’s four pillars of sustainability omitted the Environment Pillar. This error has now been corrected by Shelter WA and the attachment has been updated.
15. Following discussion at Policy Committee the section ‘At risk of homelessness’ under Policy Definitions has been amended to include ‘family separation’ and ‘older women’.
16. At Policy Committee an amendment raised by Mayor Vernon was passed as follows:

“Insert the following words at the start of clauses 10 and 11 to read as “Subject to compliance with any requirements of privacy legislation and confidentiality,”

16. After the amendment was passed an issue with the wording of clause 11 was identified as incorrect and had been included by an administrative error. The correct wording that was intended is as follows:

“The Town recognises the important role that a healthy supply of social and affordable rental housing plays in addressing homelessness and will investigate affordable housing options as outlined in the Local Planning Strategy.”

17. The intended wording is considered more effective as it addresses Local Planning Strategy considerations. Administration recommends addressing this error at the September 2022 Ordinary Council Meeting by raising an amendment as follows:

“That Council adopts the amended Policy 113 - Homelessness as per attachment 3; subject to:

1. Inserting the following words at the start of clause 10 to read as “Subject to compliance with any requirements of privacy legislation and confidentiality,”.
2. Amend clause 11 to read as: “The Town recognises the important role that a healthy supply of social and affordable rental housing plays in addressing homelessness, and will investigate affordable housing options as outlined in the Local Planning Strategy”