



Submission on
ACT Budget Priorities 2019-2020
Community Sector Priorities

November 2018

About ACTCOSS

ACTCOSS acknowledges Canberra has been built on the land of the Ngunnawal people. We pay respects to their Elders and recognise the strength and resilience of Aboriginal and Torres Strait Islander peoples. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) is the peak representative body for not-for-profit community organisations, people living with disadvantage and low-income citizens of the Territory.

ACTCOSS is a member of the nationwide COSS network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS' vision is to live in a fair and equitable community that respects and values diversity, human rights and sustainability and promotes justice, equity, reconciliation and social inclusion.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

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November 2018

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Introduction

ACTCOSS has seen a growing alignment of our ambitions for this city, and the people who live here on a low income, with the agenda set through ACT elections and the investment priorities identified by government and the private sector.

Budget decisions regarding human services over the past few years demonstrate a government that has acknowledged the importance of investing in services that respond to people facing difficult circumstances, addressing housing market failure and improving education attainment. There has been investment in improved urban amenity, including in renewal of civic infrastructure and mass transit systems. ACTCOSS has argued for more investment in liveability at neighbourhood level, municipal level community development and growing social participation and civic engagement, including for groups who experience stigma and discrimination.

The 2019-20 ACT Budget could position Canberra as a city that builds nation leading sustainable social inclusion by being smart and tactical – in our policy settings, investments, planning, design, implementation of whole of government strategies and in leading socially inclusive budgeting and development.

A smart, tactical approach will ensure investments are curated to benefit those most in need and with the greatest barriers to access i.e. think about ways to maximise the benefits experienced by citizens who need more support not just those who are able-bodied, digitally literate, confident with articulating and getting their needs met and financially stable.

For example, a smart and tactical revenue measure would ensure concessions regimes which are calibrated to lift the burden of fines, fees, bills and charges away from those with least capacity to pay and ensure a progressive approach to setting the fine so its deterrent effect is fair across the whole income distribution.

A smart and tactical approach would also ensure investments maximise their alignment with social procurement and ethical investment principles – including environmental sustainability objectives, employment of and self-determination by Aboriginal and/or Torres Strait Islander peoples, and employment of people with disabilities, newly arrived people, people who experience discrimination because of gender diversity and people returning to work from caring roles or because of poor health.

We need service funding that responds to changes in the population and community needs.

We see a need for more long-term planning and investment certainty to build social, economic and environmental interventions that will strengthen our capacity to deliver a fair, prosperous and sustainable future for everyone who lives here.

There are some general themes that cut across our submission and go beyond specific investment priorities:

- The ACT needs an agreed set of social wellbeing goals that all policy proposals, reform agendas and financial investments need to contribute to delivering. These overarching goals would complement the well-articulated economic development agenda for our city and region
- The Government needs to improve integration and coordination across Directorates and policy agendas. There is a loss of corporate knowledge and line of sight in areas of the ACT Government that are focussed on delivering specific agendas or reacting to change – especially in education and health.
- ACT Government funded programs need to focus more on early intervention and whole-of-life, whole-of-family responses to avoid unnecessary interactions with the justice system, reduce risks of crime victimisation, improve individual and family wellbeing and protective factors, and foster long-term community safety and cohesion.
- Reform agendas need to be properly resourced to ensure ambitions are matched by adequate resources for implementation, and transparent evaluation of progress, so the promise of reform is fully delivered. Over the coming four years this will be particularly important in justice reform, community support, family support, child protection, education, health and the NDIS.

ACTCOSS has applauded the ACT Government's calls to raise the rate of Federal income support payments, including during the Treasurer's 2018-19 Budget speech.

The ACT Government can continue this leadership by maintaining its support of the raise the rate campaign to increase base rate Allowances and pushing back against DSS changes to Centrelink for people in Alcohol and Other Drug treatment – this is harmful and counterproductive to the harm minimisation approaches advocated in this city.

The ACT is also positioned to carry this thought leadership into other COAG negotiations – adequate funding to address gaps in disability services within and outside the NDIS, national action on affordable housing, meaningful action on climate change, full implementation of the Gonski funding model and adequate funding amounts and timeframes for the community services that all people rely on during difficult life stage transitions and/or when facing adverse circumstances.

Overview

This submission focusses on the following priorities for investment

- Municipal level social and community infrastructure, services and community development;
- Investments that address social determinants of justice system interactions;
- Self-determination for Aboriginal and/or Torres Strait Islander peoples;
- Delivering the ACT health reform agenda;
- Investing in financial assistance, financial counselling and conflict resolution services;
- Ensuring decent wages in community services don't reduce supply of services to people in need.

We also highlight actions and further investment needed to ensure effective implementation of existing commitments in:

- Affordable housing
- Transport infrastructure development
- Improving school education
- Disability services
- Family and children's services
- Young people's services
- Reducing and responding better to sexual, domestic and family violence
- Implementing the ACT Community Services Industry Strategy 2016-2026

The ACT Government has made some smart decisions to lead on social issues and inclusion for many groups of people. In the 2019-20 ACT Budget we need to see this commitment to social justice extended into Budget allocation decisions.

Delivering well on Budget commitments

To ensure **new investments** in the 2019-20 ACT Budget are as effective as they can be and that core objectives are met ACTCOSS recommends the following:

- Policy capacity (by the project owners within the relevant Directorate) must be adequately resourced to ensure that the roll out of new investments is well designed, prompt, consistently implemented and high quality.

- Include funding in Budget initiatives for community involvement, lived experience and neighbourhood voice and consultation. This will enable community stakeholder, technical and specialist advisors to inform, monitor and evaluate initiatives. It will also ensure knowledge that is located outside of government (e.g. non-government and private sector corporate memory of the history of policy and program development) can be accessed and utilised. This will ensure better design, delivery, monitoring and evaluation processes. We note that the Citizens Alliance for Participatory Democracy have called for more support for government led participatory processes and learning and support for community led engagement and capacity building. ACTCOSS supports this agenda.
- Clear milestones, deliverables, targets and performance indicators should be agreed with key stakeholders and publicly released. People who are the expected beneficiaries of the investment should be considered primary stakeholders for consultation during design, and development of milestones, deliverables, targets and performance indicators.
- Criteria for success (and failure if necessary) needs to be outlined at the start and assessed at all stages of implementation via an agreed and fully resourced evaluation strategy. A review against criteria for success agreed at the beginning of implementation involving internal and external stakeholders should be publicly released midway through implementation of initiatives to ensure any risks to delivering on the original intent and risks to delivery on objectives can be identified and mitigated.
- Reforms and initiatives relevant to the implementation of each new investment should be incorporated into the rationale and description of the initiative so that the potential for other programs and policy settings to influence delivery of objectives are identified, monitored and included in design, implementation and evaluation. This would also allow external stakeholders to consider and provide advice on potential conflicting priorities.
- Include data and expertise on the needs of people on low incomes and ensure compliance with disability access, age-friendly city, gender diversity competence, reducing recidivism and other whole-of-government priorities for reducing inequality.
- When ACT Budget initiatives are to be delivered within existing resources, for example via internal reprioritising, Budget documentation needs to be transparent about what activity will cease or reduce.
- Apply a gender responsive lens and approach across all new investment. We note YWCA's policy position that the Office for Women should be relocated to CMTEDD to effectively institute whole-of-government gender responsive policy planning and implementation. Gendered analysis is particularly important given recent trends towards mainstreaming service delivery, rather than investing in specialised women's services.
- Regular reporting of whether and how initiatives deliver progress against the relevant United Nations Sustainable Development Goals 2016-2026.

- Regular public reporting on whether and how new and initiatives comply with ACT Government procurement policies such as the Local Industry Procurement Policy, Secure Local Jobs Package, Indigenous Procurement Policy and the Social Procurement Policy.

Priorities for new investment

Investments listed below include those that are necessary, overdue and/or required to reduce the risk of crisis and long-term deprivation and disadvantage. These include:

- Municipal level community infrastructure and community development
- Investments which address social determinants of interactions with the criminal justice system
- Self-determination for Aboriginal and/or Torres Strait Islander peoples
- Delivering the ACT health reform agenda
- Investing in services that prevent escalation of financial hardship and family/neighbourhood disputes
- Ensuring decent wages in community services don't reduce supply of services to people in need

Across all these investment priorities there is a need to ensure they deliver for the people who experience lower than average economic, education and/or health status. As recognised in the United Nations Sustainable Development Goals, lifting outcomes for the bottom 40% faster than average is key to making Canberra a more equal and inclusive city.

Community infrastructure, Services and Development

"We have a strong pride in our city and its unique character. Just as Canberra is unique, every suburb has its own character, and government must engage at a local level to ensure that local communities have what they need to thrive. Our communities will continue to change over time. As the needs change, services will need to respond" - extract from the Better Suburbs statement

Community infrastructure supports social inclusion and community cohesion via investment at a municipal level. This infrastructure includes the buildings and public spaces that enable social connections between people with shared interests and concerns, and the organisations or services that build connections between people and across the community.

Strong community infrastructure creates strong communities with resilience and the foundations for growth in both economic capital and social justice. Neighbourhood and suburb level community development can be led by people

who have support to build their own skills and capacity. Community Services Organisations are best placed to deliver community development activities for regions and particular groups, consistent with their mandate, membership and community linkages. Dedicating resources to building the community development workforce and resources to support both self-led and facilitated community development will be vital to building social wellbeing in all locations, for all people.

There are challenges in the Territory Administrative Arrangements, which are different from a conventional municipal government, in planning, funding, delivering and evaluating municipal level social infrastructure in the Territory in a way that is integrated across different portfolios.

ACTCOSS members have identified an underinvestment in the ACT in these components of social infrastructure:

- Community facilities that are fit for purpose, affordable, accessible and adaptive over time as community needs change
- Community support (including support tailored to groups that experience stigma, discrimination and marginalisation, and community facilities)
- Arts, culture, sport and recreation (in terms of diversity inclusion, cost of access and opportunity to engage)
- Public and community transport (in terms of alignment of planning/design, needs analysis)
- Places like public libraries, youth centres, drop in centres and other places where people can gather and connect at no cost are vital to social wellbeing, especially for low income people or people who experience non-financial barriers to participating socially.
- A renewed emphasis on integrated social and built environment planning is needed in the ACT which takes into account the need for integrated development and renewal of urban environments and human services, that can respond to population shifts, workforce changes and demographic changes. We should develop a more integrated and strategic view of the way that investments in housing, urban renewal and transport can ensure good amenity for all Canberrans including young people, seniors and people with disability.
- Redesign of group centres should prioritise development of social infrastructure such as youth recreational facilities, social activation and community organisation service delivery and meeting spaces.
- Planning for the city as we age, and our mobility needs change requires mandatory requirements for universal design and establishment of a disability access advisory structure that monitors and provides advice on development proposals.

Investment in this core social infrastructure is vital to a healthy, inclusive, sustainable community. Key priorities for improved liveability at neighbourhood and precinct levels are shared by the people of Canberra as they have made

clear through deliberative processes such as the Better Suburbs Statement and the report of the Housing Choices Collaboration Hub.

There is a lack of investment across all demographics in community development and addressing social, physical and economic access barriers to enjoying the high-quality lifestyle and economic opportunities available in this city.

Investment in municipal level community development is a missing component of efforts across the ACT Government to ensure people affected by poverty and inequality can express their views, influence decisions that impact on their lives and future opportunities, shape the service system and influence the priorities of government. This investment will add value to the diversification of citizen engagement and resident consultation processes offered under the Community Engagement and Communication Strategy. Both targeted community development and mainstream engagement are needed to manage the once in a generation renewal and re-imagining of our city.

A smart city starts with recognising and reducing inequality

Planning for a smart city should focus on interventions that support those who *need the most support* and should join up urban renewal, community facilities planning, transport and digital infrastructure. As writers on smart cities have observed:

Most broad scale infrastructural improvements will end up supporting city users who are already independent of changes to city services. With this in mind, smart strategists should also focus on how we can respond to issues facing us now, curated with a particular focus on citizens who need more support.

Truly smart cities with a focus on inclusion should use the huge amounts of data available to target and respond to gaps in public services, asking questions such as; Where are citizens travelling for long periods of time to access cheap food? Where are citizens barely using the bus services at all? Where is inaccessible for citizens with disabilities and why? Where are school grades dropping? Why are crime rates spiking?¹

Planning for a changing city

As Canberra densifies, we note that there are common themes in research that identify concerns about security and safety in dense social housing spaces, and the role of community development in response to this.

¹ Hannah Kaner, *Designing for 'everyone' is not the path to an inclusive smart city*, *Information Age*, 24 August 2018, viewed 31 October 2018 < <https://www.information-age.com/inclusive-smart-city-123474406/> >

Living in insecure environments deteriorates social capital and there is significant research which finds links between housing type, social cohesion and the availability of community development².

Denser types of housing (whether dual occupancy or multi story housing) will require planners and policy makers to work on ways to ensure that emergent communities are vibrant, cohesive and connected with the means to build connection and avoid social problems and disputes.

Ensuring equality of access to consultation and decision-making processes

The ACT Government Community Engagement and Communication Strategy provides a foundation for community participation in decision-making.

Proactive community development and rights-based work with groups who experience exclusion would value add to this Strategy. This is because there are specific groups in our community who consistently miss out on both resources and opportunities and face significant discrimination when they seek to express their views, exercise their rights and access services. These groups include Aboriginal and/or Torres Strait Islander peoples, young people, older people, women, people who identify as lesbian, gay, bisexual, transgender, queer and/or intersex, and culturally and linguistically diverse people.

Planning services for a growing city

There is currently no consistent, managed relationship between population growth, changes in community composition and funding for services which are required to meet the needs arising.

ACTCOSS advocates for an in-depth community needs assessment targeting specific communities, that would account for demographic characteristics including levels of disadvantage and the current availability and distribution of services.

Community development

The ACT Government provides very little ongoing funding for community development of the type typically offered by municipal governments. There are pockets of government funded community development such as the successful work by the Linking into New Communities taskforce and Mingle program, but these programs are time limited and are not available to all people in all locations across the ACT.

There is one organisation (the Community Development Network, known as CDNet) that has supported both a community information distribution platform and a community of practice that supports volunteer and paid community development workers across the ACT. This program has previously received

² K Hulse & W Stone, *Housing, housing assistance and social cohesion*, Australian Housing and Urban Research Institute, Melbourne, September 2006.

\$14,000 per year from ACT Health (until 2015) and from Community Services Directorate (until 2017). This program is currently unfunded despite a review in 2014 finding it was valued by community and government stakeholders and more recent demonstration of ongoing relevance and effectiveness with the numbers of people participating growing, including ACT Government officials.

Increased funding for community development workers who can work with the broad community, and with groups at risk of marginalisation, is essential at this stage of the growth and renewal of our city. The model of community development that should be used would:

- Recognise individuals and communities often disengage because they feel disconnected, powerless, lacking things to contribute, and/or victims of circumstances beyond their control
- Take assets and strengths of the community as starting point,
- Recognise many assets exist even in the poorest communities
- Draw on tangible and social community assets particularly community-based associations and social networks
- Mobilise individuals, associations, and institutions to come together

Investing in community development will ensure people have opportunities to build mutual understanding, resilience, social capital, natural affinities and a sense of neighbourhood as well as feelings of safety.

High rise living offers great potential for community but also creates a need to invest to secure perceived safety and security in and around the precinct as well as responsive programs and services that mitigate the risk of, and respond effectively to the occurrence of, disputes and conflict.

Canberra is currently undergoing a period of urban infill, transport redesign and population growth. While we welcome the Governments attention to community facilities, such as the community centre planned for Woden, there is a need for dedicated *human* resources within the ACT Government and community who can facilitate and foster community development practice that contributes to urban renewal.

For instance, ACTCOSS has worked with Directorates to increase inclusion of people who are transport disadvantaged in co-design processes, during the introduction of new ticketing, bus routes and the introduction of Canberra Metro.

Investment is needed in:

- Municipal government style community development available across the city and consistently over time, building on the successful (but time and scope limited) work by the Linking into New Communities Taskforce and Mingle Program. This could be achieved via establishment of dedicated teams in every region of Canberra of community development coordinators and workers. These workers would be based within

community organisations who could work in partnership with ACT Government agencies and officials to improve community amenity, engagement and cohesion.

- Funding CDNet to continue to provide a community of practice for community development workers and to evolve its information distribution platform
- Requirements/incentives for developers to build community infrastructure into new developments especially in medium density settings
- Involving community development workers and volunteers, residents, community councils and community organisations representing communities of interest (e.g. newly arrived communities and language communities) in the development of a policy framework and investment model for long term provision of fit for purpose community facilities across the city. This would include community leaders and the ACT Government agreeing the priorities for community facilities and service development. These priorities would guide Directorates leading urban planning and those leading service planning and ensure a co-ordinated, strategic approach to long term planning and short term development of facilities and services.
- Dedicated policy capacity and resources within ACT Government such as a community development coordinator who could work with both ACT Government and community stakeholders to collaborate on social planning activities (eg group centre or master plans) and fostering community development assets within ACT Government (eg via public libraries)
- An in-depth, finely grained community needs assessment which would account for demographic characteristics including levels of disadvantage and the current availability and distribution of services.

Justice

In the ACT crime rates are declining yet numbers in the Alexander Maconochie Centre (AMC) are increasing. Services and advocacy organisations working in the justice space have clearly noted that there is a significant and urgent need for increased funding for justice reinvestment, early intervention and prevention programs especially for children and young people whose families are in contact with the criminal justice system.

Investment in reducing the social determinants of contact with the justice system that build on current justice reinvestment programs, further Canberra's goal of becoming a restorative city, and respond to problems, gaps and transition issues out of the AMC and crisis services for women and children are fundamental to reducing recidivism and over-representation of particular population groups in the criminal justice system.

Instead of investing more in expanding capacity in the AMC, substantial and sustained investment must be made in prevention, rehabilitation and recovery focused services based in the community and led by the organisations most connected to the people at risk of incarceration.

More substantial investment in diversionary services are needed to change the relentless upward trajectory of incarceration, and over-incarceration of people who have been in prison before, and especially of Aboriginal and/or Torres Strait Islander adults and young people.

ACTCOSS advocates for a restorative justice approach to preventing incarceration that recognises the interconnectedness of our high rates of children and young people in out-of-home-care; high rates of homelessness and housing unaffordability; and inadequate access to services to recover from trauma, mental health and drug and alcohol rehabilitation and recovery support, and services responding to women who are exposed to violence.

The urgency of addressing health and safety within the AMC means services find it difficult to advocate for and consider more preventative approaches.

At present, services are stretched to even ensure support at crisis point. Crisis demand will not decrease until the ACT Government significantly reduces social determinants of contact with the justice system and invests in programs that divert young people and adults from more serious offending and/or sustained contact with Corrections.

Bail support accommodation

The most immediate investment that would reduce numbers in the AMC is bail support accommodation. Without it, the presumption of bail for all minor offences cannot be met for people who are accused of crimes who do not have adequate, stable and/or safe accommodation. This leads to unnecessary time spent in prison, negatively affecting people's health and wellbeing and that of their families and communities.

ACTCOSS recommends the ACT Government seriously consider work completed by the ACT Inspectorate of Correctional Services on the viability of bail hostels in the ACT. The government should ensure bail hostels are an effective transitional solution, not subject to over-securitisation and with clear exit pathways. Bail houses have also been recommended by Aboriginal Legal Service (NSW/ACT), and we highlight their ask for Aboriginal specific bail houses.³

Surround supports

From an early intervention and prevention standpoint, we urgently need increased funding to sectors that surround and interact with the justice system,

³ Aboriginal Legal Service (NSW/ACT), *ALS NSW/ACT Submission to the ALRC*, Aboriginal Legal Service (NSW/ACT), 2017, Sydney, p. 3-4.

such as Alcohol and Other Drugs (AOD), mental health (MH) and sexual, domestic and family violence (S/DFV) sectors:

- In the AOD sector, a lack of treatment and support leads to contact with the criminal justice system. ACTCOSS has heard that over recent weeks one ACT peer support service had to refuse support to new clients due to increased pressures from existing clients with highly complex needs.
- Prompt action on developing housing support and psycho-social support services - better access to peer-based services and maintenance of family and other informal caring roles are both vital to supporting people’s recovery, relapse prevention and broader wellbeing alongside formal services.
- In the S/DFV space, the government should investigate a shift from funding services within a housing/homelessness model. A whole-of-family model more effectively addresses trauma (particularly child trauma); increases service accessibility by removing the implicit or actual need for women to leave the home to receive support; and addresses root causes of violence through rehabilitative work with users and perpetrators.

A focus on early-intervention and prevention requires a whole of government approach. The sector is concerned that the current approach to justice work misses the connections between education, out-of-home-care, youth justice and adult justice; this compromises early-intervention and prevention. We particularly highlight that the Education Directorate must be involved. Disengagement from school is a risk factor for contact with youth justice – particularly for children in out-of-home-care.

What is needed	Why
Implementation of a wider scope of justice reinvestment programs, particularly ones specific to the needs of Aboriginal and/or Torres Strait Islander people, women and young people.	The ANU Centre for Social Research & Methods report ‘Reducing Recidivism in the ACT’ mentions that achieving the commitment to a 25% reduction in recidivism by 2025 will need to reduce post-release recidivism to 29% by 2023. ⁴ It is currently at 39%. The government must institute target-specific and strategy-specific funding to reach this goal. As per the report, we ask for “significant financial investment across all government sectors... [because] recidivism is a multi-factorial phenomenon that requires a coordinated whole-of-government response”.

⁴ Centre for Social Research & Methods, *Reducing Recidivism in the ACT: A rapid assessment and desktop review of national and international targets, measures and strategies*, Australian National University, Canberra, 2018, p. 7-9.

What is needed	Why
<p>Increased investment in post-release and transitional support services for people leaving the AMC. There is an urgent need for bail support accommodation and parole support, to enable people to meet the conditions of their release and successfully reintegrate into the community.</p>	<p>Throughcare has been successful for some, but more work is needed to support people with complex needs and from marginalised population groups, such as women and Aboriginal and/or Torres Strait Islander people. Detainees should be provided with a range of post-release options, such as varied work opportunities appropriate to individual needs. Community organisations should be resourced to offer this support, and the government must remedy the current situation of community services diverting funds or relying on volunteers to offer essential, highly skilled in-prison services. This will ensure detainees are able to contact services they can continue to access post-release.</p>
<p>The ACT Government could set an example by introducing employment targets for people who have been in prison.</p>	<p>Stigma around time spent in prison continues to hinder successful community transitions, particularly in relation to employment. Supporting gainful employment post-release is important in the ACT, as 75% of those in the AMC have been previously imprisoned.⁵ This suggests people who have been in prison have trouble reintegrating into our community.</p>
<p>Invest in prison health services (physical and mental), including a needle & syringe program and specialised women's health services.</p>	<p>The Health Service Commissioner's report into opioid replacement treatment (ORT) in the AMC specifically recommended the implementation of a NSP in the AMC.⁶ This is essential to achieving human rights compliancy; until detainees have access to a NSP, the standard of healthcare available to them will not be the same as the standard available in the community.</p> <p>The negative effects of the inadequate standard of healthcare are further</p>

⁵ *ibid.* p. 4.

⁶ ACT Health Services Commissioner, *Review of the Opioid Replacement Treatment Program at the Alexander Maconochie Centre*, ACT Human Rights Commission, Canberra, 2018, p. 2.

What is needed	Why
	<p>compounded for women, who have restricted access to many prison facilities, as they are located in the main part of the prison, primarily accessible to men. ACTCOSS has noted the need for gender-responsive care since 2013, when we stated our concern that due to economies of scale, women in the AMC were not receiving timely healthcare, particularly female-specific health information and programs.⁷</p>
<p>Investment is needed in systems-wide Corrections staff training on working with prisoners with disabilities. Data-gathering on disability within the AMC and Bimberi must also be improved, as a means of offering more effective support to detainees.</p>	<p>People with disabilities are overrepresented as both victims and perpetrators within the criminal justice system, but the lack of data and identification of disability hinders transparency and prevents advocacy organisations from making effective policy recommendations.⁸ Advocacy for Inclusion has previously noted that disability was not explicitly included in the Human Rights Standards for ACT Corrective Services document, despite the specific needs of detainees with a disability.⁹</p>
<p>Investment in the AOD sector with a focus on increasing availability of treatment services and access to community based and peer-led support for rehabilitation, recovery and relapse prevention.</p>	<p>Community-based treatment is underfunded, immensely pressuring services and eroding the opportunity for people to access non-clinical supports. Treatment is cost-effective, and it works; peer-support provides an accessible avenue to treatment and should be adequately funded. Investment in AOD should include resourcing effective governance channels between the sector, JaCS, and Health.</p>

⁷ ACTCOSS, *Submission on The Human Rights Audit of Conditions of Detention of Women at the Alexander Maconochie Centre*, ACTCOSS, Canberra, 2013, p.6.

⁸ Advocacy for Inclusion, *Submission in Response to the Human Rights Standards for ACT Corrective Services*, Advocacy for Inclusion, Canberra, 2018, p. 5-6.

⁹ *ibid.*

What is needed	Why
Continued investment in community legal services to improve access to justice and timely intervention in the ACT, particularly for low-socio economic Canberrans, those from marginalised backgrounds, and people living in public housing.	Community legal services deal with more than a client's presenting legal issue, offering wrap-around-support by liaising with a range of services and Housing ACT. Increased staffing and support will prevent more complex or sustained contact with the justice system. We note Canberra Community Law has identified a need for a significant increase in services accessible to people with a disability.
Adequate resourcing for the sector to participate in development of the Disability Justice Strategy.	<p>Given the wide scope of the Strategy across civil and criminal justice, investment is needed in identifying a clear scope. This will enable the sector to use its knowledge and expertise most effectively in providing advice and advocacy.</p> <p>Consideration should be given to a volunteer solicitor program, like the model currently operated by the NSW Intellectual Disability Rights Service</p>
A 'Budgeting for Life Work Development Program' to provide regular financial literacy sessions for people in the community as part of the ACT Government's Work Development Order offering.	ACTCOSS supports the 'Managing fines for people on low incomes' submission by Care Financial Counselling Inc. Care's submission outlines a detailed rationale and business case for this proposal.

Women's S/DFV services

Investment is needed in women's specialist crisis support services; evidence-based programs for domestic and family violence support; accessible services; services which support children, funding for whole of family responses and a service model paradigm shift that removes the link between DFV and homelessness through whole of family supports. People shouldn't need to become homeless to receive DFV supports.

What is needed	Why
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<p>Urgently increase funding for women's crisis support services</p>	<p>This should include funding to enable support for women with disabilities, who are significantly underserved due to physical barriers that make accommodation unsafe or inaccessible. There are also DFV services taking care of mothers who are struggling to rear a child with a disability. This should be a disability issue not DFV.</p>
<p>Service funding to address the needs of children</p>	<p>Services are currently diverting funds to offer this support. Supporting children is essential to early intervention, as addressing child trauma may prevent them from later meeting the justice system as a victim/survivor and/or perpetrator. This is an emerging area and the government should commence work on compiling a solid evidence base on good practice in child-centred support.</p>
<p>Greater research into specialised and evidence-based programs for S/DFV support, to reduce need for services at the crisis-point.</p>	<p>This should include investigating service outside a housing/homelessness model and not in competition with the urgent need for increased support to women's homelessness services -- funnelling women into public housing is not a solution to domestic and family violence. The Family Safety Hub is an example of an innovative model developed collaboratively with the sector and women with lived experience.</p>
<p>Funding for services to offer long-term, whole-of-family responses to Domestic and Family Violence.</p>	<p>DFV is a social and community justice issue – not to be dealt with solely by the legal system. Addressing the core of the issue requires assisting men to stop using violence and addressing factors that contribute to violent behaviour. The Domestic Violence Crisis Service's Room4Change program is a good example of a specialist domestic and family violence service working</p>

	with users of violence. It works with men who want to stop using violence and offers ongoing whole-of-family support.
Fund an intentional shift in the model that encourages and supports victims and survivors to stay in the home rather than perpetuating DFV as a driver towards homelessness	The current pressure experienced by crisis services shows need for increased pre-crisis, early intervention support that offers safety and the opportunity for victims/survivors to stay in the home. Whole-of-family supports prevent women and children from needing to become homeless to receive support. A shift in the crisis-focused model will require investment in workforce capability.
Funding to address gaps in children and whole-of-family support beyond tertiary level interventions. This includes counselling, volunteer mentoring and education programs for boys and young men especially in the middle years. And funding for parent and carer support programs such as Parentline ACT.	Boys and young men need specific programs to respond to their needs as victims/survivors and/or users of violence. Menslink have noted that young boys who use violence are a significant growth area. Parent and carer support programs work to develop child and family wellbeing and prevent trauma and developmental and behavioural problems from occurring.

Aboriginal and/or Torres Strait Islander Self Determination

Over two years ago in the Redfern Statement Aboriginal and Torres Strait Islander peak organisations stood together to call for a more just approach to Aboriginal and Torres Strait Islander Affairs, expressing a deep concern that government policies continue to be made for, not by, Aboriginal and/or Torres Strait Islander peoples.

Last year in the Uluru Statement from the Heart leaders spoke to the structural problems with the relationship between the First Nations Peoples and others, and the torment of powerlessness. The Uluru Statement from the Heart called for a First Nations Voice enshrined in the Constitution.

In the Community Shared Statement of priorities for the 2016-2020 term of the ACT Government, representatives from across the ACT community sector noted that:

There is a need to build and sustain independent non-government organisations that enable self-determination and community control. These organisations, especially Aboriginal and/or Torres Strait Islander Community Controlled Organisations, should have the capacity and authority to hold services and decision makers to account, and advocate for policies and services that meet community needs.

There is a lack of targeted investment and willingness to cede control and enable self-determination across the full range of service responses needed to address overrepresentation of Aboriginal and/or Torres Strait Islander peoples in many domains, especially inadequate housing, low education attainment, poor health status, the criminal justice system and care and protection interventions.

Investment in Aboriginal and/or Torres Strait Islander community-controlled organisations is needed to ensure they have resources available to share their insights and advice in service development priority setting, design, implementation and review processes.

ACTCOSS looks forward to community facilities such as Boomanulla Oval being transferred to Aboriginal and Torres Strait Islander community control. We also look forward to the Elected Body Indigenous Procurement Policy being developed and transforming the commissioning and delivery of services.

ACTCOSS is keen to see the ACT Government establish targets as part of a whole of government Indigenous Procurement Policy. Such support and initiatives would provide direct economic benefits to the ACT Government and the local economy as well as delivering broader community benefits. Investment in implementing an effective Indigenous Procurement Policy is particularly valuable in providing Aboriginal and/or Torres Strait Islander children and young people in the ACT with a real sense of opportunity for their future.

The over-representation of Aboriginal and/or Torres Strait Islander children in out-of-home-care in the ACT is a key area in which community controlled organisations such as Gugan Gulwan Youth Aboriginal Corporation and Winnunga Nimmityjah Aboriginal Health and Community Service have noted the need for self-determination and more community control. Out-of-home-care is especially significant due to the links between it and the youth and adult justice systems.

Funding for the 'Our Booris, Our Way' review of Aboriginal and Torres Strait Islander children and young people involved with Child and Youth Protection announced in the 2018-19 Budget is welcome as a step towards addressing this overrepresentation. However, further investment is needed to support Aboriginal and/or Torres Strait Islander community controlled organisations to take a lead role in addressing this over-representation.

Similarly, the ACT Government should invest in community controlled organisations to offer post-release and transitional support services for people leaving the AMC. In our ask for bail support accommodation, we note the Aboriginal Legal Service (NSW/ACT) highlights the need for an Aboriginal specific bail house, and community controlled organisations should be involved in coordination of this. Engaging and adequately resourcing the expertise of

Aboriginal community controlled organisations in post-release transitions would also go towards more effective and culturally safe and appropriate support for Aboriginal and/or Torres Strait Islander people who have been in prison. The ACT has high Aboriginal and/or Torres Strait Islander incarceration rates, and the rates of imprisonment for Aboriginal and/or Torres Strait Islander women in the AMC are rapidly increasing. This can have devastating impacts on communities and families, which community controlled organisation are best placed to service and support.

We are pleased to see that access to Winnunga Nimmityjah Aboriginal Health and Community Service will be available for all detainees in the AMC.

Investment is needed in:

- Supporting Aboriginal and/or Torres Strait Islander children, youth and families in the ACT. ACTCOSS noted the need for new facilities for the Gugan Gulwan Youth Aboriginal Corporation in our 2018-19 Budget Priorities. Funding for Gugan Gulwan to identify suitable accommodation options announced in the 2018-19 Budget will need to be followed up by adequate investment in the facilities themselves.
- A comprehensive Indigenous policy statement should be prepared in consultation with Aboriginal advisory and peak representative bodies.
- A 'single point' of planning, implementation, monitoring and evaluation of Indigenous policy and coordination within the ACT Government, with authority to work across portfolios.
- The design and construction of an Aboriginal residential alcohol and other drug rehabilitation facility in the ACT.
- Consulting with Aboriginal and/or Torres Strait Islander community controlled organisations on how to make the Alexander Maconochie Centre human rights compliant in accordance with its original vision.
- Provide autonomous, holistic health and wellbeing services at the AMC as part of the implementation of the Independent Inquiry Report by Philip Moss
- Increased funding for support services offered following release from incarceration in close concert with Aboriginal and/or Torres Strait Islander community controlled organisations. This should include funding to enable the Aboriginal Justice Centre to be re-established.
- To restore Boomanulla Oval for full community use and transferred to Aboriginal control and management on a sustainable basis

We also direct Government to the submission from Winnunga Nimmityjah Aboriginal Health and Community Services.

Shaping and delivering the ACT health reform agenda

There is a pressing need for investments to support the emerging health reform agenda and to ensure adequate investment to address the non-clinical factors (such as the social determinants of health) that impact on health status and influence access to and effectiveness of publicly funded health services.

Investments are needed in several areas of health service delivery, and greater funding certainty for non-government organisations funded by ACT Health is urgently required. Continuing to respond to growing demand for inpatient hospital services must be balanced with investments in preventative health services, primary care (including but not limited to General Practitioner provided services) and community-based health care and wellbeing services, including peer led services. Investing more in these services is the only way to reduce demand for acute, tertiary level high cost interventions. These primary and secondary intervention investments will lead to reduced health costs and burdens of disease in the long term.

Priorities for investment in 2019-2020 include enhanced sexual health services and responses for women effected by transvaginal mesh, a palliative care ward at Canberra hospital, systems and workforce development, enhancements to the pain clinic, a disability health strategy and resourcing responses and cultural change work arising from the current independent inquiry into ACT Health.

The last Budget provided insufficient information about recurrent funding for the University of Canberra Hospital. There is an expectation that a new hospital would expand services beyond those currently available, and not just be a transfer of existing services from the Canberra Hospital.

The 2019-20 Budget needs to outline the funding that will be allocated to the planned walk-in centre in central Canberra.

Investment is needed in:

- Responding better to the non-clinical needs of people with poor social determinants of health and lower health status than the average in the ACT, including through the Community Assistance and Support Program (CASP)
- Delivering more long-term funding certainty for organisations delivering services contracted by ACT Health, to ensure service and workforce continuity
- Recurrent funding for the new University of Canberra Hospital
- Preventative health interventions that improve the social determinants of health, for example food security
- The planned walk in centre in central Canberra
- Increasing provision of alcohol and other drug treatment and rehabilitation services (see further commentary in the Justice section)

- Resourcing responses to the recommendations included in the ACT Health workplace culture inquiry. It will be necessary to support culture change based on a restorative approach, and account for the impacts on both staff and those receiving services
- Improving the access and responsiveness of a range of health care settings to people with disability (see breakout box below)
- Trauma informed practice and service design training for government and non-government workers, especially in the community-based mental health sector, and with health professionals working in Canberra's emergency departments and hospital-based mental health services
- Adult mental health day services
- Reproductive health – affordability of contraception continues to be an issue, and access to services such as abortion can be out of reach despite legality
- Infrastructure, financial and workforce resources in community based, publicly available sexual health services
- National Code of Conduct for health care workers - both users of health services and the health professionals that fall under the new code need to be educated about their rights and responsibilities
- Financial support for women who require specialist transvaginal mesh removal services available in Sydney; and further fund the Canberra Mesh Clinic to meet the needs of women who are experiencing complications from mesh implants
- Publicly available pain management services – including financial resources and workforce development
- We note the HCCA submission, which strongly supports the establishment of a dedicated palliative care ward at the Canberra Hospital and the Palliative Care Clinical Network's plan to establish an ACT-wide palliative care service with a single point of entry, including a single patient record. More ACT health professionals should be trained in the palliative care approach
- Improving the quality of support and management of chronic conditions - HCCA recommends a patient navigation service to address some barriers faced by people with chronic and complex conditions and meet the priority needs of consumers.

Spotlight: A Disability and Health Strategy

A disability and health strategy should focus on the following areas:

Policy: addressing cost issues through dedicated low cost services, including a once a year free extended consultation and access to information; and auditing and improving health infrastructure to make it more

fit for purpose for people with disability. It should also address NDIS health interface issues.

Workforce development: providing a range of training, disability confidence and skills development work led by people with disability to a range of people including practitioners, health and wellness services outside the formal system and, specifically, to doctors doing Centrelink assessments.

Services: establishing specialist centres of excellence for diagnostic disabilities with wrapped around services.

Responding to financial hardship

Analysis of 2016 Census of Population and Housing data commissioned by ACTCOSS has revealed hidden disadvantage in the ACT, with just over one in 10 Canberrans living in low-income households (defined as having less than \$500/week before-tax income), including 12% of children.¹⁰

ACTCOSS analysis released in May this year showed that cost of living in Canberra continues to rise; these increases are disproportionately high for households that can least afford it. For the fourth consecutive year, our research showed that utilities and essential services such as transport and housing rose above the national rate. And the cost of living in Canberra is most significantly harmful to households earning minimum wage or on income support payments. Newstart, Youth Allowance, and the Disability Support Payment are inadequate for the high costs of Canberra.

Financial counselling and community-based mediation and conflict resolution services are essential pillars of a civil society. Adequately funding these services is complementary to investment in improving affordable housing supply, reducing homelessness and justice reinvestment and will contribute to the ACT Government's commitment to becoming a restorative city.

Investing more in responding to difficult financial circumstances including through investments in more progressive revenue measures, widened concessions, financial assistance, counselling and conflict resolution services will prevent long term hardship for many people in the ACT.

Financial assistance

Economic change needs to be better managed to mitigate the risks of increasing inequality. Better management includes prioritising addressing cost of living pressures for people on the lowest incomes, including via more finely

¹⁰ R Tanton, R Miranti & and Y Vidyattama, *Hidden disadvantage in the ACT: report for ACT Anti-Poverty Week*, NATSEM, Institute for Governance and Policy Analysis (IGPA), University of Canberra, Canberra, 2017, accessed 22 November 2017, <<https://www.actcoss.org.au/publications/advocacy-publications/hidden-disadvantage-act-report-anti-poverty-week-2017>>.

differentiated approaches to concessions, fees and charges that are administered by the ACT Government.

The current gap between the concessions available for utility costs and the growing costs of utilities is a case in point.

People without a Commonwealth health care card often do not qualify for concessions despite being financially vulnerable. Furthermore, the risk of losing eligibility for a health care card can be a disincentive to taking up short-term employment opportunities.

Another is the flat rates of fines and charges in areas like minor traffic infringements, using the Finnish model studied by the Australia Institute¹¹. Income adjusted fines would represent equal financial hits for drivers as a proportion of their disposable income. As fines are designed as a disincentive to dangerous driving, it would send the same message to people of different incomes, while mitigating the risk of people losing their licences due a lack of capacity to pay or accruing debt and moving into hardship.

Financial counselling

Adequate funding for financial counselling services is integral in this context. Investing in these services is important to committing to early intervention and prevention. Unresolved financial issues can be particularly compounding, and ACTCOSS has heard that this feeds into the high recidivism rates in the ACT, as people exit prison into debt.

If left unresolved, complications related to financial stress and debt can escalate, and may lead to homelessness and/or contact with the justice system.

Investment is needed in

- Improving the concessions scheme operated by the ACT Government, and other fee and charging regimes, to expand access according to need, not age or source of income, in view of persistent and widening cost of living pressures for low-income households in the ACT
- Introduction of income-based fines
- Increases to financial counselling services to keep pace with demand

Mediation and conflict resolution services

In the 2018-19 ACT Budget, we welcomed investments for Canberra as a Restorative City. Restorative practice at its core builds healthy communities and facilitates voice and inclusion. Counselling and conflict resolution services are

¹¹ The Australia Institute, *Income Based Fines – factsheet*, 30 January 2016
< <http://www.tai.org.au/content/income-based-traffic-fines> >

essential to this practice. Conflict resolution services offer restorative practice resolutions to interpersonal and systemic conflict or crises.

Conflict resolution services are an important way of diverting people from the justice system and offering a community solution where police and other systems responses would be too extreme or would escalate the situation.

Conflict resolution and related counselling services offer a non-threatening, interpersonal model of assistance to young people, which may divert them from developing more complex issues and/or making contact with the justice system.

Conflict resolution and related counselling services are accessed by a wide subset of members in the community, particularly in the family conflict resolution and unification support area.

Additional funding is needed to meet the breadth of need that presents to these services. ACTCOSS has been advised by members that there is a false stereotype that financial counselling and conflict resolution services are only accessed by people from low socio-economic groups, which services feel leaves them under-resourced to assist their wide client demographic.

Investment is needed in:

- Increased investment in mediation and conflict resolution services
- Dedicated funding for financial counselling workers with a focus on family violence and financial abuse. This role should dually raise awareness of financial abuse and offer support to women with debts or other financial struggles as a result of abusive relationships. We support the 'Responding to financial abuse holistically through a financial and legal partnership' submission made by Care Inc. and Women's Legal Centre ACT
- Increased investment in counselling services to provide whole-of-family supports and case management. This requires greater resources but working with a whole-of-family lens is the most effective way of supporting people and resolving issues
- Following from investment in restorative practice research in the 2018-19 Budget, ACTCOSS would like to see funding for the provision of these projects
- Investment in counselling services for middle-income earners – the 'missing middle' who are often unable to pay for services but are missed by current funding targeted at low-income earners
- Increase investment to allow financial counselling services to offer services to detainees while they are in the AMC

Ensuring decent wages in community services don't reduce supply of services to people in need

Equal Remuneration Order

In 2012, the ACT Government agreed to ensure implementation of the Equal Remuneration Order (ERO) by Fair Work Australia covering community sector workers would not reduce funds available for service delivery. The ACT Government provided funding supplementation to several organisations for the period of transition to the ERO. This supplementary funding ceases in December 2019.

ACTCOSS members are universally reporting significant risks to ongoing capacity to continue delivering services at current levels post-December 2019 because the overall increases in wages associated with the ERO will not be able to be met within post-December 2019 funding envelopes.

In summary, funding indexation over the past 8 years (of between 2.85-3.45% each year) has not matched cumulative wage cost increases of between 29% for lower level positions and 45% for senior roles. The full cost of matching base funding to the ERO needs to be calculated as a matter of urgency, via a collaborative costing exercise involving both community sector employers and ACT Government funding bodies. Service funding base rates need to increase to ensure service delivery is not cut back to meet the shortfall.

The ACT Government has previously committed to increase funding in line with the ERO, as demonstrated below:

An Information Sheet distributed in 2012 stated:

The ACT Government announced support for the community sector to meet the impact of the case back in February 2012, and we have been working with the sector since then to meet the Government's commitment. That commitment is that all community sector organisations funded by the ACT Government at July 2012 and that employ workers eligible for a salary increase due to the equal remuneration case have and will continue to receive support for those increases while the organisations remain funded by the ACT Government.

In a letter to funded organisations of 19 December 2013, from the Director of Community Sector Reform in the Community Services Directorate, community sector employers were told:

The intention of the ACT Government is that sufficient support is provided to allow community sector employers to meet, at a minimum, the award salary for the relevant classifications, as adjusted by the ERO each year....

...Clause 6.2 of the Service Funding Agreement provides for a joint review should the costs for delivery of the services increase outside the control of the organisation...The impact of the equal remuneration case is

considered to be a necessary cost increase outside the control of the organisation.

Secure Local Jobs Package

The Secure Local Jobs Package currently does not apply to community service employers. It is anticipated that the ACT Government intends to extend the requirements of this package beyond the industries currently in scope following initial implementation. If this occurs, ACT Government funding bodies will need to work collaboratively with community sector employers to calculate the cost of compliance and increase funding to match these cost increases.

Investment is needed in:

- A joint process between funders and employers to quantifying the gap in funding between real costs of providing adequate wages and broader workforce quality obligations and current funding agreement service delivery targets and expectations
- Increasing funding to address the gaps identified in above process

Ensuring effective delivery of current commitments

Housing and Homelessness

ACTCOSS notes the ACT Housing Strategy has been released. Commitment by the ACT Government to spend \$100m on growing supply and renovating public housing is excellent and needs to be actioned promptly. The budget will need to specify what investments will be made, in what timeframe, to deliver on all the other actions outlined in the Strategy. In addition to delivering on these promises, program development is needed to respond earlier and more substantially on homelessness experienced by young people aged 8-15 and their families.

Progress in each action area will need to be independently assessed and evaluated in a coordinated whole of government way with transparent reporting back to the community. ACTCOSS wants to see a formal mechanism for community, tenant and industry representatives to work collaboratively with the ACT Minister and Officials over the life of the Strategy on more detailed design, implementation, scrutiny of implementation and monitoring of progress of improvements in housing outcomes for people in the bottom 40% of the income distribution.

ACTCOSS is of the view that effective implementation of the Housing Strategy needs more than funding. Specific investment and timeframes against each

action is required to ensure the high-quality plan delivers practical improvements in access to affordable housing and reductions in homelessness.

The Strategy does not include significant detail on several actions that are priorities for ACTCOSS members. The 2019-2020 Budget should announce when and how these improvements will be incorporated into Housing Strategy actions.

Universal Design

The ACT Parliamentary Agreement commits the ACT Government to encourage Universal Housing initiatives by: holding a roundtable to develop incentives that will encourage construction of new homes and apartments that meet the Liveable Housing Design Silver and Gold Levels; developing training programs for architects and builders; showcasing Universal Housing in demonstration housing projects; and playing an active role at COAG to push for genuine progress on the 2010 COAG agreement (in the National Disability Strategy), for new housing to meet Universal Design Standards.

The strategy commits to investigating the introduction of a rating system for housing with accessibility and universal design features when a property is advertised, on a voluntary basis, prior to considering a potential mandatory rating scheme.

Investment and policy work is needed to host and follow-up on the roundtable; develop incentives; ensure demonstration projects showcase accessibility and develop training programs for architects and builders.

Caravan parks

In addition to the protections offered to renters in the strategy, ACTCOSS notes the long standing provision of the Long Stay Caravan Park as a form of housing provision and supports recommendations made by SGS consulting in 2011 in their report on the Long Stay Caravan park which recommended better legislative protections for people living long term in caravan parks or mobile home parks, especially independent grievance appeal mechanisms.

Energy efficient housing

The ACT Government needs to legislate minimum 5 star energy ratings as a requirement for all private rental housing, and balance this increased obligation on private landlords with creation of a Zero Emissions housing support fund that supports private rental housing owners to install energy supply and efficiency infrastructure. The legislation should also include a requirement that rents charged cannot be increased above CPI after those houses have been upgraded using the fund to support private rental housing owners to install energy supply and efficiency infrastructure.

Homelessness

There is a need for a service model for children and young people aged 8-15 in the ACT to prevent youth homelessness.

There are currently no accommodation services in the ACT for young people under the age of 16 who are experiencing or at risk of homelessness. This has consistently been identified as a critical area of concern across the ACT youth and homelessness sectors for nearly two decades, recognised in the 2004 'Breaking the cycle: ACT Homelessness Strategy', but never adequately addressed. With a shared commitment across government and community services to intervene early to support positive outcomes, and to build strong communities in the ACT, it is now imperative that the ACT Government and community sector takes collaborative action to respond to children and young people aged 8-15 who are at risk of significant harm and subsequent homelessness.

The Youth Coalition of the ACT and Families ACT have developed a proposal for a youth homelessness prevention and response model that ACTCOSS endorses.

Housing needs to be available to people on bail. There is an urgent need for a bail support accommodation model in the ACT, due to the relationship between insecure housing arrangements and people being unable to secure bail, and therefore being sent to – or returning to – prison (see Justice).

We need to see some of the commitments to further investigate certain options in the strategy turn into tangible actions to support the sector's growth in delivery of affordable rental accommodation. More investment is still needed to ensure the growth of a sustainable Community Housing Sector. While the Strategy contains useful measures consideration should be given to the proposals from CHIA ACT for a rates exemption to community housing owned and managed by CHPs.

Investment is needed in

- Delivering the affordability measures within the ACT Housing Strategy including the \$100m investment in housing renewal and new public housing over 5 years
- Monitoring capacity to ensure strategy targets are delivered including the new target setting aside 15% of government land releases for public, community and affordable housing, including infill development and new suburbs.
- Funding to grow the community housing sector through the provision of 151 dwellings across different sites including funding to build and maintain sector capacity.
- Funding to establish and maintain non-government involvement and oversight via a formal mechanism for community, tenant and industry advice to the Minister for Housing

- Scoping and funding a service model for youth homelessness with a targeted ACT policy commitment and response to supporting children and young people aged 8-15 and their families. Service components should be: early intervention outreach; a short to medium term respite and accommodation; and long term supported accommodation in a homelike environment
- Investment by health and justice programs to complement ACT Housing investment to ensure access to appropriate housing for people leaving corrections or health facilities
- Investigating, designing and implementing measures that will sustain the growth of community housing

Education

Adequate resourcing is needed to implement the Future of Education Strategy, including investment in the classroom as well as in communities and families. This should include clear timeframes for delivery and transparent mechanisms for implementation, evaluation and reporting of improvements in education equity.

Measures in the last Budget to employ a dedicated Parental Engagement Officer to work within schools and parent groups may miss the mark on genuine parental engagement due to being located within schools. For parents and carers disengaged with the education system, schools are often not accessible and/or don't feel like safe spaces to seek support; employing staff within the system may therefore be ineffective. ACTCOSS notes that community organisations and services are often already working with families who are vulnerable, disengaged, or at risk of disengagement, and are therefore well placed to act as a bridge between them and the school system.

In our 2017 audit of the Schools for All Program, ACTCOSS noted that almost one quarter of the recommendations that had not been achieved were related to joint work with the Community Services and Health Directorates, including development of the 'Schools as a Hub' project, which would develop multi-agency outreach services in schools with disadvantage. ACTCOSS is keen to ensure that the Future of Education program does not follow this same trajectory.

Supporting vulnerable ACT children and families should include planned, long term investment for whole of community schools, more cultural responsiveness and safety, and smoother transitions across the school system, especially between primary and high school. The government should also explicitly deliver improved education experiences and attainment for Aboriginal and/or Torres Strait Islander students and their families. This requires investment in improved social infrastructure and partnerships outside the school gate. This is the gap in investment that will need to be filled if the ACT Government is to deliver the equity focused, student centred goals of the Future of Education program.

Investment is needed in

- Adequately resourcing community organisations to work effectively within schools – rather than only funding engagement officers within the school gate.
- More effectively consulting with other Directorates, particularly Justice and Community Safety, to better contribute to early intervention and prevention work from a whole-of-family community justice perspective
- Extend the Schools Climate and Satisfaction Survey to year 4 and add additional issues to spark early intervention approaches and address issues before they become entrenched through early intervention and well before the age of 14. The Families ACT submission has useful detail on this ask.

Transport

Community, neighbourhood and mass transport systems need to develop in an integrated way and be resourced in this way. Planning should include an emphasis on supporting those with the greatest barriers to transport and access to community facilities and services to get to where they need to go¹². Investment in community and neighbourhood transport services needs to be integrated into urban renewal planning.

ACTCOSS has been talking with Transport Canberra about the potential for public transport to be conceptualised beyond mass transit systems. This will enable a more comprehensive needs assessment and planning process and guide sufficient investment in broader models of mobility as a service beyond mass transit systems. This would also ensure ACT government funding for transport infrastructure delivers well for people experiencing social disadvantage, including via on-demand and mass transit systems.

One ACT community transport provider we spoke to told us that they could not keep up with demand for transport services for people aged over 65 years, including transport to hospital. This unmet need can lead to exacerbation of relatively small problems into more expensive problems to resolve, including health status and social isolation. This service's community bus is fully subscribed meaning that no new requests for service can be accepted. Vacancies currently only open up when an individual moves into residential care or passes away. Community transport is more than travelling from point A to B – it is a 'wrap around' service, helping people through the front door to access goods, services and social connections.

Transport is also a significant concern among people with disabilities. This includes public transport. Along with PWD ACT, we want to ensure that the ACT Government is on track to meet its commitment to have all public transport accessible by 2020. PWD ACT are also concerned about transport standards in the ACT, especially footpaths.

¹² <https://www.actcoss.org.au/publications/advocacy-publications/position-paper-transport-'wicked-problem'-we-have-strengths-and>

Investment is needed in

- Funding community transport at sustainable levels and in a manner that will ensure community transport continues to be available to all who need of it. That means ensuring a community transport system that is available to more than just people eligible for an individualised funding package through Commonwealth initiatives like the National Disability Insurance Scheme (NDIS) or an aged care package. For example, women with young children or family members needing mobility assistance, who are primary carers and do not own a private vehicle; or people who do not have a driver's license and/or own a private vehicle or who are unable to use public transport because of mental health issues. Attention needs to be given to adequate and secure funding for community transport post 2019, especially from ACT health. Community transport requires funding continuity so that providers can upgrade, renew and replace vehicle stock and plan across a multi-year timeframe.
- Needs assessment, policy, design and planning work to ensure transport design, planning, integration and implementation addresses the needs of those with transport disadvantage across both on-demand and mass transit systems. This work should ensure that transport investments keep up with urban infill, growth and group centre redesign and that this is done with lived experience input from those with the greatest level of transport disadvantage. Pro-active lived experience testing should be routine in transport re-design processes
- Investigating transport gaps for people experiencing social disadvantage and funding any improvements in transport coverage and frequency required to meet the needs identified
- Improving the fairness and adequacy of transport related concessions. This should include: concessions for learner, probationary and restricted driver's licenses and aligning the discount on license fees for Health Care Card holders (currently 50% of costs) with Pension Card Holders (100%)
- Evaluating accessibility of existing public transport infrastructure (vehicles and fixed infrastructure) for people with disabilities and other mobility issues and fund improvements to meet accessibility standards as an urgent priority
- Undertaking a study of transport costs to examine how individuals on low and fixed incomes meet costs of vehicle operation and maintenance and if and to what extent this involves reliance on sub-prime loans. Measures should then be developed to address findings on the broader relationship between transport costs, indebtedness and infringements (e.g. driving unregistered) for people on low and moderate incomes.

Disability

ACTCOSS welcomed funding in the 2018-19 Budget for better support for Canberrans with disability. This included providing new funding for people who

have high or complex support needs that are not currently being met by the National Disability Insurance Scheme (NDIS) via the Transition Integrated Service Response program funding. Pressures on people and service providers regarding the NDIS needs to continue to be supported by the ACT Government. Organisations filling gaps and demonstrating good community support should continue to be funded especially those that face viability issues due to the way NDIS is structured.

Workforce development needs continued support and skills development for staff should be an ongoing priority for investment.

The Government should continue to support systemic advocacy, including on mainstream systems outside of NDIS. Mainstream systems (e.g. transport, health care, urban design, housing design) are not delivering fully for people living with disabilities. Disability inclusion expertise within government, and via funded collaboration with community-based expertise, should be a priority for additional funding in 2019-2020. There is a need for ongoing work to ensure that transport, housing, streetscapes and new suburbs coming out of urban infill meets community standards for accessibility and that this is tested by people with lived experience of physical and cognitive disabilities.

We are keen to see prompt action on the universal design commitments included in the ACT Housing Strategy announced in October 2018, while other commitments outlined in the Parliamentary agreement also need to be progressed.

ACTCOSS has consistently noted that the government needs to make an ongoing commitment to supporting foundational social infrastructure in our city in a range of areas including: support for self-help groups; information and referral services for people with disability and chronic illness; bespoke aids and equipment and other services which cannot be provided within an NDIS model; an Information, Linkages and Capacity-building (ILC) project based model; or for people who do not have an individualised NDIS funding package.

There remains a lack of funding that allows a standing capacity to run community programs and provide community spaces, such as drop-in centres and group programs. There has been a loss of community building where services and/or spaces have disappeared in the transition to the NDIS where 'community' services are unable to fit within 'individual' packages.

ACTCOSS is disappointed that there were only limited measures in the 2018-19 Budget that address and implement the recommendations of the ACT Legislative Assembly inquiry into the employment of people with disabilities.

Investment is needed in

- Responding to ongoing NDIS transition issues and to fill gaps in transition not filled in other measures, such as the assistance for SHOUT. The \$1.7m provided in 2018-19 was a good start but it will only cover some gaps for a brief period. There is a need for continued support to organisations filling gaps and meeting demonstrated community need.

- Capacity building of local services in response to the extension of the NDIS to more people with a psychosocial disability. ACT Government needs to invest in service availability and infrastructure and potential complaints responses to respond and meet demand from people with psychosocial disability now moving into the scheme
- Work on improved health system responses for people with disability, including work at the NDIS/health interface (see health commentary)
- Implementing commitments made in the National Disability Strategy including tangible measures on Universal Housing Design (as mentioned in the Parliamentary agreement and our housing section), improved health service responses and implementation of the recommendations of the Inquiry into employment of people with disabilities
- An access taskforce that will ensure development and planning of housing, transport, social and community infrastructure is accessible to people with a range of physical and cognitive disabilities and is tested by lived experience
- We refer to the detailed asks in the PWD ACT submission on energy costs, transport provision gaps, social inclusion and service gaps for young people

Family and children's services

Improved delivery on the promise of the Step Up for Our Kids reform agenda was identified as a key area of concern for community services in the ACT through our consultation with ACTCOSS members and key stakeholders.

Investment is needed in:

- Work with families, including extended families, to prevent Aboriginal and/or Torres Strait Islander children and young people from entering the out of home care system in the first place.
- Developing the capacity of non-Indigenous carers to support Aboriginal and/or Torres Strait Islander children and young people in their care to have cultural support. This may be in the form of an Indigenous Foster Care Support Program that supports non-Indigenous carers to access and/or provide cultural supports for children and young people in their care
- Culture camps for Aboriginal and/or Torres Strait Islander children and young people in out of home care that would address the need for both cultural connection for kids and respite for carers. The programs would be built on a strengths-based approach and be delivered by Aboriginal and Torres Strait Islander Community Controlled organisations
- Ensuring the funding of service provision matches the need for staffing capacity to address the overloading of caseworkers and burn out of staff

- Advocacy as a component of ACT Government contracts in children, youth and family services. There is a need for funding of advocacy to be reinstated as a valued role of peak bodies and community sector service providers
- The Children and Young People Commissioner and Public Advocate to provide advocacy, safeguards and protection for children and young people in and exiting out of home care
- After-care support that provides a clear pathway from out of home care and proper funding to meet the needs of children and young people (including young adults 18 years and over). This includes a need to support young people once an out of home care order has ended. We note advocacy to lift the age of eligibility for services to 21 years via the Homestretch campaign. Specifically:
 - Young people in care, in consultation with their foster parents, provided option to voluntarily remain in their care until age 21
 - A personal case worker/mentor to help link them with education, training and job opportunities and to support their health and well-being
 - Safe, secure and supported independent living for young people leaving care, especially those exiting residential care, who cannot or choose not to take the voluntary extension of foster care supports
- Consulting with young people to inform development of the ACT after-care policy.
- Addressing the shortfall of carers in the out of home care system, challenges to the recruitment of carers, and the need for greater support for current and new carers. There is a need to be more responsive to the needs of carers, particularly kinship carers. This includes a need for respite for carers. Measures are needed to address the lack of training and financial support for carers. This is an issue for kinship carers who lack access to supports and services available through ACT Together.

We also note AIDS Action Council's submission, which highlighted the need for professional counselling services for LGBTIQ communities, and the wider work necessary on reducing stigma, prejudice, discrimination and exclusion – factors that contribute to the recent increase in demand for counselling services. There is need to support members of the Trans community, inclusive of people transitioning as well as partners and family members.

Women

There have been significant announcements in previous budgets regarding the Women's Plan, Family Safety Hub and specialist housing and homelessness services for women.

However, as mentioned earlier in this submission, the women's services sector is struggling due to inadequate funding, and inappropriate funding models. The struggle for survival by existing services means the sector must focus on immediate crisis responses, and therefore find it difficult to advocate for early intervention and prevention programs. ACTCOSS stresses that in recommending investment in mechanisms that will target the causes of violence, the government should also increase resources to crisis support services working at the tertiary level.

Aside from the need for innovative and evidence-based programs that work with users of violence, the government should expand the primary prevention work offered in schools and to the community. Consent and Respectful Relationships education are essential to establishing community understanding of healthy relationships – sexual, romantic or otherwise. This is a whole-of-community issue and the community sector should be readily engaged with adequate resourcing.

Women and girls continue to experience gender-based disadvantage, and those with concurrent marginalised identities may experience poorer outcomes due to gender and diversity-blind policy making. Better data collection, that is disaggregated by gender – particularly in the housing, disability, and mental health spaces – would enable the government and sector to more effectively respond to the needs of women and girls. We note YWCA's ask on gender responsive budgeting and governance.

Investment is needed in:

- Specialist women's services in S/DFV, including specialist support for Aboriginal and Torres Strait Islander women escaping domestic violence
- A Women's Plan with more detail and transparency. We draw your attention to YWCA's budget submission on this issue
- Primary prevention and consent education tailored to diverse populations
- Respectful Relationships education in schools – for all staff and students. These should be implemented at a minimum standard across the ACT, and community organisations should be adequately resourced for delivery

The sector is also calling for the ACT Government to reinstate the Women's Budget Statement and enact a Gender Equality Act with quotas and targets.

Spotlight: ACT Women's Plan

ACTCOSS welcomes investment in delivering the ACT Women's Plan 2016-26 but note that this investment must not be limited to support for increased representation on boards and committees via the ACT Diversity Register and delivery of board traineeship programs. As announced in the lead up to the Budget by the Deputy Chief Minister, the

investment should at least also extend to: community engagement to promote gender equality in the ACT; improving the evidence base related to the gender equality; and training to reduce and eliminate unconscious bias across government.

Volunteering

Work is needed to addressing key barriers for volunteers working in mental health organisations, including the operation of the Working With Vulnerable People check, training of volunteers and introduction of a passport that records training/qualifications of volunteers in order to facilitate movement between organisations without having to repeat completion of training/qualifications. This relates specifically to volunteers as distinct from peer support employees.

Investment is needed in

- Funding to implement the ACT Volunteering Statement Action Plan 2018-2021
- Implementing elements of the ACT Community Services Industry Strategy 2016-2026 that relate to volunteering
- Funding in service contracts to cover costs of volunteer engagement, management and ensuring compliance with regulatory and quality requirements

Environment

“The liveability of our suburbs is intertwined with our natural environment. The value of our urban forest, green spaces and waterways underpins the amenity and beauty of each of our suburbs as well as Canberra as a whole”. Better Suburbs Statement 2030

In our analysis of the 2018-19 Budget ACTCOSS welcomed several initiatives that support sustainability and address our impact on the environment:

- Whole of government effort to accelerate the achievement of greenhouse gas reduction targets
- Moves to deliver Actsmart programs that help low income households to save on energy bills and reduce greenhouse gas emissions by reducing their energy and water consumption. We also note Actsmart programs for schools, businesses and some investments in eco-tourism
- Several pieces of work to protect native species and improve water management and protect local catchments, reserves and sanctuaries.

However, ACTCOSS members are of the view that sustainability investments are also needed across a broader agenda.

The Community Shared Statement of Priorities for the 2016-2020 term of the ACT Government asks for city infrastructure, signed by 19 community organisations, asked the ACT Government to:

- Ensure there is a safe climate and clean energy by supporting 100% renewable electricity by 2020 and zero net emissions by 2040;
- Address climate change;
- Reduce energy poverty through targeted expansion of household energy efficiency measures; and
- Ensure a just transition to adapt to climate change by developing further responses in consultation with climate affected communities and workers.

Investment is needed in:

- A long term plan for sustaining biodiversity and protecting ecological values in addition to emissions reduction and climate change adaption measures
- We need to move beyond isolated short term measures addressing weed control and invasive species. The current measures do not deliver an integrated Territory wide plan for effective stewardship over time
- We need support for climate affected communities, appropriate on the ground consultation and transition for workers
- Redevelopment and urban renewal must prioritise high value greenspace
- Appropriately recognising and resourcing the role of environmental workers, rangers and researchers. Additional rangers are required due to policies around biodiversity offsets, which are stretching their capacity. Reserve areas are growing due to these kinds of policies, but the capability is not
- Ongoing support for low income, small business and community organisation customers to participate in energy policy and regulatory decisions, and to contribute to development and implementation of the ACT Climate Change Mitigation Strategy and Action Plans

Justice

The ACT Government has committed to a significant reform agenda in the justice portfolio, including aiming to become a Restorative City, reducing recidivism and over-representation of Aboriginal and/or Torres Strait Islander peoples and people with disabilities in the AMC, the Disability Justice Strategy, and the Building Communities Not Prisons investment strategy.

The community services and legal sectors need a policy resource to improve the quality and quantity of input provided to ACT Government decisions regarding the intersection of human rights, social and economic disadvantage,

ACT government-funded community service provision, and law and justice issues.

This policy resource should be based in a community organisation and will ensure improved capability and engagement of community organisations (in the community services, health and legal assistance sectors) to contribute to law reform, review of human rights issues, reform in the criminal justice system (including courts, law enforcement and corrections systems), legislative reform in the justice and community safety portfolio and improving access to civil and criminal justice. These contributions are sought regularly but there is no specific funding to facilitate collection, analysis and presentation of insights from community legal services or from non-legal services working with people who are over-represented as victims and perpetrators of crime.

Investment is needed in:

- Establishment of a community-based policy resource that can engage with key stakeholders, analyse and synthesise the evidence base relevant to justice, law and corrections system reform, address gaps in the ACT evidence base via consultation and research, and share insights from practitioners outside of government with government advisors and decision-makers.

ACT Community Services Industry Strategy 2016-2026

In July 2016 the ACT committed to the ACT Community Services Industry Strategy 2016-2020. In this Strategy an ACT Community Services Industry Innovation Fund was identified as needed to resource initiatives the ACT Government has agreed to progress in partnership with the community services industry.

In 2015-17 the Community Sector Levy generated approximately \$670,000 from reductions in funding to service delivery of 0.35% from non-government ACT Health and Community Service Directorate contracts with non-government organisations that were over \$500,000 per annum. ACTCOSS members are looking for the ACT Government to contribute at least a matching amount in 2019-2021. This would form the basis of a Community Services Innovation Fund that could build over time, but in the first instance resource at least some of the projects listed below.

Investment is needed in:

- Community sector engagement in new approaches to tendering for human services to encourage collaboration amongst providers and promote diversity in the provision of services, increase funding certainty and support diversification of funding sources
- Development of common ICT infrastructure, as well as quality and service costing systems

- Conducting an in-depth community needs assessment targeting particular communities, which would consider demographic characteristics including levels of disadvantage and the current availability and distribution of services
- Developing an outcomes measurement framework for human services that can be applied across services and which can capture both the tangible and intangible outcomes generated by community services including increased social cohesion and inclusivity