

2 August 2012

The Hon Brendan O'Connor MP
Minister for Housing
Minister for Homelessness
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House of Representatives
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Dear Mr O'Connor

Thank you for the opportunity to comment on the draft Homelessness Bill 2012.

The Alcohol and other Drugs Council of Australia (ADCA) is the national peak body representing the interests of the Australian non-government sector for alcohol and other drugs (AOD). It works collaboratively with the government, non-government, business and community sectors to promote evidence-based, socially just approaches aimed at preventing or reducing the health, economic and social harm caused by alcohol and other drugs to individuals, families, communities and the nation.

ADCA welcomes the development of this Bill given the significant association between substance abuse and homelessness. Those who are, or are at risk of, experiencing homelessness often have complex and multiple needs with AOD disorders estimated at over six-times more prevalent in homeless populations when compared to the general Australian population (0.53%)ⁱ. Amongst those receiving treatment in New South Wales for AOD issues, 11.7% experience primary homelessness (nowhere to sleep) and 12.7% experience secondary homelessness (insecure or temporary accommodation)ⁱⁱ.

ADCA acknowledges that recommendations from its 2009 submission to the House of Representatives Standing Committee on Family, Community, Housing and Youth Inquiry *Housing the Homeless: Report on the inquiry into homelessness legislation* have been included in the draft Bill. While covered generally, the Bill is quite vague and does not address the recommendations directly. ADCA believes that the AOD-specific issues below need to be considered in more detail:

1. Funding should be provided to existing non-government AOD and other service organisations to resource outreach programs, increase capacity to engage with homeless people, and provide better integration between non-government AOD organisations and dedicated homeless providers.
2. New legislation needs to encompass a 'chain of care' concept with provisions for funding to create formal partnership agreements between relevant government and non-government service organisations; this will ensure seamless front-line service provision and ease of access to a range of services, for example AOD, mental health, primary healthcare and Centrelink.
3. Pharmaceutical benefits and extra concessions to enable this marginalised group to gain access to pharmacotherapies.

In support of Homelessness Australia's Submission to this inquiry, we ask that the Bill provide additional information. In particular ADCA would like to see greater clarity on funding details and responsibility for sector decision making, to ensure that those who are described within the Bill are able to gain access to AOD treatment services.

There are serious gaps in understanding the different needs and experiences of AOD use amongst various homeless groups. Approaches to AOD service provision to different user groups differ and understanding these variations is important for providing effective support services, particularly to those located in rural or remote areas. Many of Australia's homelessness services are not designed or resourced to cope with the demands placed on them by people with substance abuse problems. It is essential then that changes to legislation are better coordinated to provide a comprehensive response to people dependent on alcohol and other drugs.

ADCA recommends greater public sector involvement in addressing homelessness and recognition of the significant impact that alcohol, drugs, and mental health difficulties have on the community, particularly the homeless.

In developing this submission ADCA has consulted with its members, AOD NGO State and Territory Peaks, and Homelessness Australia. To discuss these issues further please contact Meredythe Crane in the first instance via meredythe.crane@adca.org.au or phone 02 6215 9808.

Yours sincerely

David Templeman
Chief Executive Officer

ⁱ Chamberlain C & MacKenzie D (2008). Australian Census Analytic Program: Counting the Homeless Australia 2006, Australian Bureau Of Statistics, ABS Catalogue No. 2050.0, p vii

ⁱⁱ Allan J & Kemp M (2012). The Lyndon Community. Personal Correspondence