

29/6/11

Mr Brian Pink, Australian Statistician  
Counting the Homeless Review  
Attn: Living Conditions Section  
Locked Bag 10  
Belconnen ACT 2616

Dear Mr Pink

**Australian Bureau of Statistics review of the *Counting the homeless* methodology**

National Shelter welcomes the opportunity to contribute to the *ABS Methodological Review of Counting the Homeless, 2006* (the Review).

We are writing to endorse the submissions of Homelessness Australia and the Council to Homeless Persons Victoria.

**National Shelter**

National Shelter is the national peak housing body advocating for low income housing consumers. Our vision is that all Australians, including those on low incomes and those experiencing homelessness, will have access to housing which is: Affordable, Adequate, Secure, Appropriate, Well located, and Sustainable.

These benefits should be available to all Australians whether or not they are homeless, own their own home, are renting from a State/Territory Government or a non-profit housing provider, or renting in the private market.

**Proposed Methodology**

National Shelter believes that the proposed Counting the Homeless methodology should only be introduced at such time as the ABS's underpinning assumptions can be proven accurate and correct, and endorsed by the Housing and Homelessness sector and experts in the field. National Shelter believes that, at very least, the Chamberlain and Mackenzie methodology should be applied in parallel to the proposed methodology to the 2011 Census in light of the disparate results each produce.

Homelessness Australia identifies the absence of a National Census of High School Students as a barrier to applying the Chamberlain Mackenzie methodology to the 2011 census. National Shelter supports Homelessness Australia's recommendation that the ABS and Council of Australian Governments direct FaHCSIA to fund a National Census of High School Students during the 2011 calendar year to enable a comparative enumeration of homelessness through the parallel application of methodologies.

National Shelter believes that the ABS should focus on improving their ability to capture information on significantly underreported segments of the homeless population, such as youth, women escaping domestic violence, couch surfers, and Indigenous people living in overcrowded conditions rather than on excluding persons from the current count based on subjective assumptions. For instance, while the ABS acknowledged that there were an estimated 102,400 Indigenous people living in overcrowded conditions in 2006, the census data only classifies 873 as homeless.

National Shelter recommends that the ABS introduce a revised methodology in 2016 after consultation with and the agreement of the housing and homelessness sector, academics, and stakeholders, including people experiencing homelessness. This revision should include the option for people to self-identify as either homeless or living in overcrowd conditions on the census form.

### **Demographic Groups of Concern**

National Shelter shares Homelessness Australia's concerns about undercounting of the following demographic groups and recommends that the ABS focus on ways to improve the quality of their data collection rather than exclude persons based on incomplete information and deductive assumptions.

#### *Women Escaping Domestic Violence;*

National Shelter supports Homeless Australia concerns that women escaping domestic violence and their children who represent the largest group seeking emergency housing assistance are excluded from the count for a number of reasons including:

- Uncertainty about access to their domicile at census
- Misclassification as holiday-makers or travellers when staying in short term accommodation, particularly where these are located in what the ABS describes as desirable locations.

The ABS should work towards improving its enumeration of people escaping domestic violence through community education, working with domestic violence services, and developing the census form to better capture this information.

#### *Persons staying in Caravan Parks and Backpackers hostels;*

National Shelter supports Homelessness Australia's position that back-packer hostels and caravan parks provide short term accommodation options for many people experiencing episodic homelessness, particularly in rural and remote areas.

The ABS should develop the census form to better capture information that enables identification of persons using these forms accommodation as emergency housing, irrespective of whether they are located in "desirable destinations".

Similarly, grey nomads and seasonal worker should not be excluded from the count if they lack a permanent residential address on census night regardless of their income or reporting of a previous address.

### *Boarding House Residents*

National Shelter believes that boarding house residents should be classified as tertiary homeless when their accommodation meets the relevant state or territory statutory definition of a boarding house rather than excluded based on a possible relationship with a lessor or landlord.

### *Young people*

National Shelter supports Homelessness Australia's position that the enumeration of youth homelessness cannot be produced without a national survey of high school students as using the census as the only means to measure youth homeless will lead to an underestimation. Similarly, the ABS needs to develop the census form to allow for a distinction between young people who are holidaying and those who are homeless other than relying on broad geographical indicators.

### *New migrants including refugees and general skilled migration program participants*

Persons who lack a permanent address on census night should be classified appropriately as homeless regardless of the length of time they have been in Australia. The proposed methodology excludes persons incorrectly based on the assumption that they have simply not yet decided where to live.

Nor should people reviewed under this category be excluded on the basis of a skilled migration program agreement with their country of origin. For instance, many New Zealanders who migrate to Australia experience homelessness without access to benefits or social housing. Under the proposed methodology, these people would be excluded on the basis of a skilled migration agreement with New Zealand.

Finally, many migrants and refugees are forced to live in overcrowded conditions once their initial six months of settlement support has ended. These people not only face barriers in understanding the census process but fear repercussions from lessors if the extent of their overcrowding becomes known.

National Shelter recommends that the ABS work with the Department of Immigration and Citizenship, settlement support agencies, and community leaders to improve the quality of reporting for CALD, refugee, and migrant communities.

## **Conclusion**

Measuring homelessness can be quite challenging due to the varying and complex nature of the homelessness experience. Members of the sector have several examples of how groups of people are often misrepresented in the homelessness data. It is critical that our experiences with people who are homeless inform the construction of a new measurement tool.

National Shelter looks forward to continuing to work collaboratively with Homelessness Australia and the ABS to ensure that the data that is available to support our work in ending homelessness is reliable.

Yours sincerely

Adrian Pisarski  
National Shelter Chairperson  
Tel: (07) 3831 5900, 0417 975 270  
eo@qshelter.asn.au

National Shelter: [www.shelter.org.au](http://www.shelter.org.au)