



30 Thomas Street, West End, QLD, 4101 Phone: (07) 3844 7713 FAX: (0) 3844 7731

SUBMISSION

BY

YOUTH AFFAIRS NETWORK OF QUEENSLAND INC.
(YANO)

in response to the

Queensland Government Preliminary Findings

of the

SAAP/CAP

Viability and Service Delivery
Model Benchmarking Report

Prepared by Bernice Smith, Carolyn Grant and Michael Zgryza. September 2000

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1. INTRODUCTION

The Youth Affairs Network of Queensland (YANQ) is the peak community youth affairs organisation in Queensland representing approximately 500 organisations and individuals across the State. Our aim is to improve the quality of life of young people in Queensland and thereby improve the quality of life of society. We advocate on behalf of young people in Queensland, especially disadvantaged and marginalised young people, to government and the community. We encourage the development of policies and programs responsive to the needs of young people and we promote and support cultural development.

The Supported Accommodation Assistance Program (SAAP) administered by Families, Youth and Community Care Queensland (FYCCQ) and the Crisis Accommodation Program (CAP) administered by the Queensland Department of Housing (QDH) are crucial programs in supporting young people, especially 'at risk' young people, as outlined in the aim of the SAAP program,

"to provide transitional supported accommodation and a range of related support services, in order to help people who are homeless or at imminent risk of homelessness to achieve the maximum degree of self reliance and independence."

As documented in the recent *Draft Young Person's Housing Statement* (2000:4) "in 1998/9, approximately 36 percent of all clients assisted through SAAP were young people". We are pleased to submit this response to the SAAP/CAP Viability and Service Delivery Model Benchmarking Report: Preliminary Findings (referred hereafter as the 'Report').

YANQ believes it is a positive step that the Report highlights that Queensland Government Priorities will be achieved *"through a range of strategies including those that improve housing and support assistance through the provision of appropriate, affordable and secure accommodation for families and individuals who are most at need, for the duration of the need"* (2000:14).

YANQ coordinated a consultation meeting regarding the Report in order to enable members to input into this submission response. YANQ also attended a consultation workshop held for Peak Bodies by FYCCQ and QDH. Youth sector programs, networks, organisations and individuals have given direct and indirect input to YANQ as the youth sector Peak Body in regards to this submission. YANQ would like to acknowledge input into this submission from its membership, particularly members from SAAP, JPET and Sexual Assault programs.

In reviewing the Report and discussing the consultation themes and questions, members requested this submission be structured in four sections. Section one addresses the view that there were large gaps in relation to target groups serviced by the program and/or lack of mention within the Report. Principles 1,3,5,6 and 7 relate

particularly to the development of a needs assessment framework and cost support component for clients with high and complex needs.

Section two addresses the Principles underpinning SAAP IV (page 13 of the Report). During the YANQ consultation it was agreed that this response should highlight the Principles and analyse the Initial Findings in relation to each of these Principles. It was through this framework that it became apparent that a key Principle underpinning the viability and service delivery was Principle Number 8: *Promote continuous improvement by learning from evaluation, research and demonstration and promoting innovation and good practice*. This principle was highlighted in relation to almost all the Initial Findings of the Report (Initial findings 1,2,3,4,6,9) which are discussed further in Section two. Considerable work is required on the Benchmarks to ensure this Principle is achieved.

As a key stakeholder and policy-player in the community sector in Queensland, YANQ has highlighted major issues affecting young people. Some of these issues may be external to FYCCQ and QDH, such as Commonwealth policies impacting on young people or issues that may effect other State Departments more directly, yet have an effect upon the viability and service delivery models of SAAP/CAP. For instance, poverty rates, Youth Allowance, drug and alcohol dependency, some of which are discussed further in Section three.

YANQ has two Policy Officer positions. One of these is a non-English speaking background (NESB) Policy Officer who supports the non-English speaking background Youth Issues Network (NYIN). A separate section has been devoted to this target group and is discussed in Section four.

SECTION 1: Gaps In Service Delivery

Young people accessing SAAP services come from a diverse range of target groups including:

- | young women,
- | young pregnant and parenting women,
- | indigenous young people and
- | young people from culturally and linguistically diverse backgrounds

To ensure access and equity to services for this broad range of target groups it is essential that the Principle regarding *'promotion of continuous improvement by learning from evaluation, research and demonstration and promoting innovation and good practice'* is priority. This can only be achieved if realistic benchmarks are set which incorporate the needs of SAAP services, given the diversity that they are working with. SAAP services often work with clients who have already been through many of the other service systems and bring with them complex needs. Although this has been recognised through processes such as NDCA National Data Collection it is essential that if SAAP workers are to be supported to work from a best practice framework they must be supported with realistic resources rather than constantly operating within a deficit framework as a result of inadequate budgets and opportunities.

SAAP Services work with an exhaustive list of issues including:

- | Violence
- | Sexual abuse
- | Self Harm
- | Suicide
- | Dual diagnosis
- | Young people in the youth justice system
- | Young people leaving prison
- | Families in crisis, including accompanying children
- | Unaccompanied minors (refugees)
- | Temporary Protection Visa holders
- | Drug and alcohol use
- | Mental health
- | Disability

This list could go on.....

Gaps in service delivery arise and will continue to exist for as long as SAAP services are expected to operate without realistic benchmarks. Issues such as sufficient administration support, access to training, opportunities to network with the wider service system and realistic operating and salaries budgets all impact upon SAAP's capacity to deliver.

SAAP workers have been undervalued over the life of the program with accusations of being unprofessional, unskilled, and unable to link with other programs and other services. SAAP workers are generally working with the most disadvantaged in the population, particularly given the crisis nature of the work, as people are assisted to independent living. The SAAP/CAP Viability and Service Delivery Model Benchmarking Report – Preliminary Findings discussed primarily the financial viability of the program while exploring benchmarks, however benchmarks need to be developed within a best practice framework that address equally the issues of:

- ◆ Achieving the best outcomes for the client
- ◆ Financial viability
- ◆ Organisational viability

In order to ensure the following principles as listed in the report:

- ◆ Ensure services are flexible and responsive to client needs and include timely intervention
- ◆ Frame service delivery around a continuum of care approach, incorporating access and equity principles and a commitment to protect clients rights and dignity
- ◆ Provide support at the earliest point of crisis as a key feature in the service response to minimise ongoing dependency on chronic or acute services within SAAP and beyond
- ◆ Ensure the service system does not exclude clients on the basis of complexity of need
- ◆ Focus on outputs and outcomes

The extensive range of target groups and issues with which SAAP is working must be recognised and benchmarks set accordingly. This can only be done with extensive consultation with the sector. Certainly the benchmarks described in the report do not reflect what is the lived experience of SAAP services nor what the majority would believe are the necessary benchmarks to ensure that innovation and best practice are a feature of their practices, programs and services.

Given that SAAP services are expected to work with clients with complex needs it is essential that flexible, creative strategies are available to the program through financial benchmarks that enable incorporation of strategies such as "brokering in" of extra support services whether that be in the form of additional rostering of staff or specialist skills. This strategy and others like it are essential given the increasing range and complexity of need of SAAP clients as a result of deinstitutionalisation and other external impacts.

During consultations YANQ liaised with the Accommodation Coordinators Network and the Queensland Youth Housing Coalition Inc. and have sited the draft benchmarks developed by the experience of Coordinators and workers in the Youth SAAP Sector. YANQ supports the work of this group and considers that the benchmarks developed by the group should provide a further opportunity to negotiate and rework real benchmarks for the sector. Certainly if SAAP is to continue to provide a safety net for disadvantaged

people it is critical that the voice of those working directly with the client group are key to any future development of benchmarks. This information is essential for the future development of needs assessment frameworks and cost support benchmarking for clients with high and complex needs.

SECTION 2: The Principles underpinning SAAP IV

- Ensure services are flexible and responsive to client needs and include timely intervention.

Please refer to Section 1.

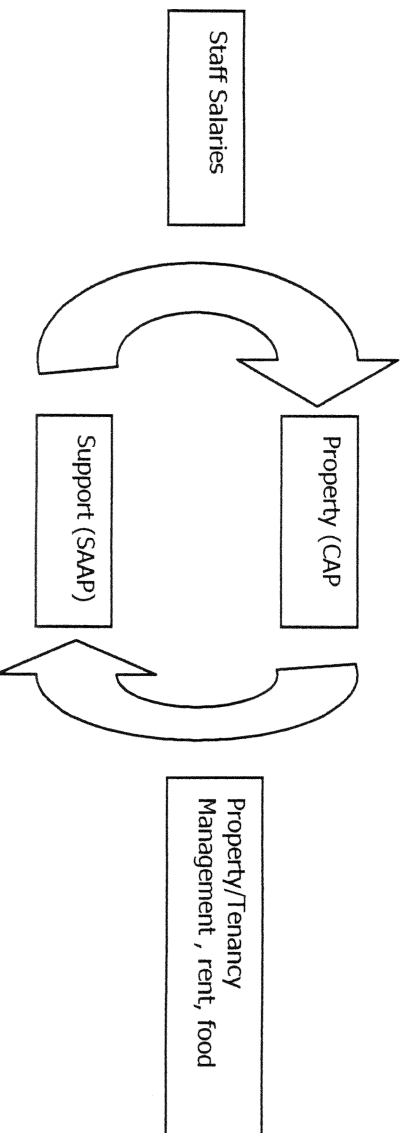
- Ensure services are accessible and clients are not excluded on the basis of capacity to pay.

There were several concerns regarding the above Principle which relates to Initial Finding 9 of the Report (p.7) and also Initial Finding 6 (p. 6-7)

- (a) Discussion occurred regarding the fact that young people should not be charged rent for crisis accommodation. They may be able to make a contribution; however, it is often difficult for a young person to access money when they are in crisis. It was, however, recommended that young people could be charged 'rent' (a percentage of their income as a contribution) while accessing medium or long term accommodation. It was further noted that they would have had support from workers in the crisis accommodation facility to secure income support, if eligible, before entering medium/long term support. The charging of rent in medium/long term facilities is also a mechanism to assist skills in living independently. The fact remains that in the current climate with increasing numbers of under 16's, the Youth Protocol between Centrelink/FaCS and Families Youth and Community Care Queensland, and the increasing number of hoops to jump through to claim eligibility for Youth Allowance that there will increasingly be young people without income support – under 21 year old 'job-seekers' and up to 25 year old students.

- (b) Considerable concern was raised by YANQ members regarding the benchmark/food costs allocated in the Operating Costs of the 'shelter formula' of \$500.00 per bed per year. This equates to allowing less than \$1.37 per bed (young person) per day. Where did this figure come from? Was it pre GST or based on rations? No household with young people could provide nutritional meals for this benchmark. This is not viable. As stated earlier, young people often do not have access to income support when in crisis and the young person nor the Shelter workers should be pressurised to find meals for clients.

- (c) A cost which is often borne by organisational operating budgets, yet not factored within the Report was the cost of assisting a young person to 'set-up' for independence eg. Sheets, Towels, household goods. This may need to be factored into equations.
- (d) It is the practice of many youth SAAP services, particularly shelter models and externally supported services to provide young people with starter packs of hygiene products. This we believe is a best practice approach, particularly in relation to the sexual health of young people and more broadly as a primary health care response.
- (e) There needs to be further exploration with regard resources being utilised for property management and resources used for support. It was discussed that money allocated to SAAP (support) should not be used for Property/Tenancy management, and that this should perhaps be provided by CAP/Housing as it relates to the property – maintenance, rates, tenancy management, security.
- (f) A further concern was that there are difficulties regarding the combined role of support worker/tenancy manager (Landlord).
- (g) The report suggests that SAAP services experience operating surpluses. Infact organisations generally work towards being extremely thrifty so that they are able to balance their total budget given that staffing costs are more often than not in deficit. Agencies go without training for staff, management committees, and volunteers and lack up-to-date equipment because the demand for client contact and support is so great. The diagram below was the outcome of our discussions during YANQ's consultation and relates to cross-subsidisation between SAAP and CAP. Both departments need to acknowledge that guidelines need to be flexible in an environment of survival and if the system is to respond efficiently and effectively more resources are needed.



- Frame service delivery around a continuum of care approach, incorporating access and equity principles and a commitment to protect client's rights and dignity.

Please refer to section 1.

- Preserve SAAP as a transitional safety net for homeless people and those at risk to maximise independence on the path to safe and secure living.

There were several concerns in ensuring the above Principle is enacted, which related to Initial Finding 7 of the Report (p.7) and also linked with Initial Finding 3,5 & 6 (p. 6-7):

- (a) There is validity in keeping the traditional 24-hour crisis shelter/refuge as a separate service. This is in order to respond to the special needs of some clients for whom this model works best, however for others a mixed model may also be sufficient.
- (b) Some concerns regarding the mixed model were regarding the possibility of some of the Principles not being upheld due to a generic approach which may occur through a 'single service approach/agreement/delivery model' because generic outcomes may lose focus on the specific needs of certain target groups.
- (c) Concern was also raised by some members regarding the funding of non-accommodation SAAP workers. This concern was due to the shortage of SAAP funding as it is the best way to utilise limited funds and it may be possible to fund these positions from another program/funding source.

- Provide support at the earliest point of crisis as a key feature in the service response to minimise ongoing dependency on chronic or acute services within SAAP and beyond.

Please refer to Section 1.

- Ensure the service system does not exclude clients on the basis of complexity of need.

Please refer to section 1.

- Focus on outputs and outcomes.

Please refer to section 1.

- Promote continuous improvement by learning from evaluation., research and demonstration and promoting innovation and good practice.

There were several concerns in ensuring the above Principle is upheld which relate to Initial Finding 1,2,3,4,5 & 6 of the Report (p.6-7) and also linked with Initial Finding 1 & 9 (p. 6-7):

- (a) Innovation and good practice requires skills, training, evaluation and research and development. Unfortunately, due to organisations trying to survive, meet duty of care requirements and deliver quality services many have had to utilise their operating costs for wages, therefore not utilising resources to support continuous improvement. This does not mean to say that improvement is not occurring, however it is ad-hoc, not documented and learnings of best practice are lost or not passed on to inform sector development. There is a great deal of innovation occurring, especially in the regions of Queensland where workers do not have the extensive close networks to share information on a daily/weekly basis. It is this Principle that affects all other principles and is the principle that underlies the strength of SAAP. It is the principle that will ensure specific target groups have their needs met and will enable quality assurance of the SAAP program.
- (b) There needs to be a review of the mid-point salary range benchmark for the length of service vis-à-vis salary subsidy. The subsidy must be benchmarked at the high point salary range as the possible shortfall is too much for an organisation to sustain, particularly given that there are many youth SAAP services who have workers with many years of continuous service. If the high point salary range monies are not utilised then a system could be implemented to either use the excess funding towards staff related requirements such as professional development or if needs be returned to the Department.
- (c) There needs to be further review of the basic staffing model benchmark of 3.75 FTE which includes a 0.25 administration position. It was discussed that the administration position needs to be increased from 0.25 to .5 – 1.0 FTE position. With ever-changing reporting requirements and increasing data collection there is ongoing and increasingly complex administration work. SAAP services are keen for the relevant bureaucracies to understand that the administration positions with services are not receptionist/secretarial positions. Extra hours allocated towards Administration will have the flow on effect of providing added support to the Coordinator who could potentially refocus on other essential Coordination tasks that are often overridden by multiple administration tasks; tasks such as management of staff and maintenance of a small caseload if applicable. The administration officer could also take on the role of supporting young people who are setting-up for independence eg. Finding furniture, household effects, etc. These types of tasks often take inordinate amounts of time.
- (d) The contingency funding for Vehicles is not sufficient. It does not take into consideration petrol and running costs for the vehicle. Also, the benchmarks need to be reviewed in light of the new GST and FBT legislation. This was a major concern from YANQ members as vehicles are a necessary resource for workers to provide support at the earliest point of crisis and continue in supporting the young person and their family.

- Collaborate with other programs and the community to encourage an environment of shared responsibility to address clients' needs.

There were concerns in ensuring the above Principle, which related to Initial Finding 8 & 9 of the Report (p.7):

- (a) There were discussions that Governments need to take responsibility to be aware of, gain knowledge of and understand how services for which they administer funding operate, and that this Report is premature as it is only a financial analysis when a Qualitative analysis needs to occur as a parallel process. The other concern was the insufficient analysis in relation to distinguishing rent and food costs. It was proposed that agencies do have this information yet it has not been requested or sufficiently analysed for the Report. YANQ members suggested that Departmental workers should spend a period of time on secondment in SAAP services as support workers and tenancy managers to gain a realistic understanding of the nature of the work and the operations of the agencies.

SECTION 3: External Issues

A feature of YANQ's consultation with members was the highlighting of external issues impacting upon SAAP – the wider service system. The following external issues were seen as being of critical importance:

1. Income Support/Youth Allowance

The recent introduction by the Commonwealth Government of the Youth Allowance has raised substantial issues concerning young people's access to income support. This is a major concern for young people and their families during young people's transition to independence. Extensive consultations have been held by FaCs across the country with a range of stakeholders regarding the introduction of Youth Allowance. YANQ's Youth Allowance Working Party also held a forum for 100 workers from around the State. Among the most frequently cited concerns were the following:

- ◆ The treatment of eighteen year olds and over as dependents was strongly resented by parents and young people
- ◆ The inclusion of step-parent's income in the parental means test was seen as unfair, particularly if the young people had not previously lived with the step-parent
- ◆ The impact of the extension of parental means testing on unemployed eighteen to twenty year olds and their families
- ◆ The ability and capacity of education institutions to cater for the needs of a wider group of under–eighteens
- ◆ Rates of Youth Allowance were frequently criticised as too low, particularly for young people who were on a part-rate payment, because of the parental means test

- ♦ Young people were concerned about being dependent on their parents for a longer period, the adequacy of rates, discrepancies between Youth Allowance and New Start Allowance rates (for over twenty-ones) which were disincentives to study, and Centrelink service delivery issues
- ♦ The community sector reported an increased demand for their services due to the introduction of Youth Allowance and presented case studies to highlight the impact.

The shift to extending dependency could have the unintended results of increasing family conflict, more young people departing from the family home, and probable increases in youth homelessness. Young clients of SAAP services are close to 40 per cent of the total.

Another example of the extending dependency phenomenon is the issue of housing assistance. Ironically, one of the major benefits of an Integrated Youth Allowance was to be the extension of Rent Assistance to full time students. However, under present arrangements, it appears that only a minority of students (mainly those from rural families) are actually benefiting from Rent Assistance. Further, some unemployed young people have lost their current Rent Assistance entitlement as assistance is only paid to young people who 'must' live away from the parental home for work or study related reasons.

2. Welfare Reform

The Commonwealth government's Welfare Reform initiative will no doubt have future impacts on income support for young people, education and training and extension of the concept of mutual obligation. YANQ has responded to the report produced by the Reference Group appointed by Minister Jocelyn Newman.

The focus of YANQ's response drew from learnings from our experience of the implementation of Youth Allowance with concerns that similar reforms have further marginalised disadvantaged young people.

3. Under 16's in SAAP

Throughout the life of successive SAAP Agreements, young people under 16 have presented to SAAP services in increasingly significant numbers. Being both homeless and under 16 significantly increases the young person's vulnerability. Young people under 16 years of age have generally been seen as the responsibility of State welfare departments and State-funded substitute care services, as opposed to Commonwealth sponsored programs such as SAAP. However, some young people are unwilling to accept support from State-funded substitute care services as well as places often not being available for them. Some young people are willing to engage with SAAP funded organisations. An under 16's in SAAP Protocol has been developed between Families Youth and Community Care Queensland and SAAP Service Providers, however this does not alleviate the fact that this is yet another group that service providers in SAAP must respond to, often with high needs and little if any income support.

4. Poverty

Youth unemployment rates at January 1999 were 20% for the 15 – 19 year old age group and 14.9% for the 20 – 24 year age group. As noted in the issues paper produced by the Queensland Council of Social Service (1999) *People and Places – a profile of growing disadvantage in Queensland*, the situation of the single people under 25 income unit group has deteriorated markedly since 1981–82. The data in that report point to a growing trend in youth poverty and the harsh reality of widespread youth unemployment in Queensland, especially in some regional areas of the State.

Even when in employment, young people with limited qualifications often find themselves in casual employment, with minimal protection and minimal job security. They make up a large proportion of the low paid. The vulnerability of young people in the labour market reinforces their overall socio-economic vulnerability.

Further if young people do not have access to affordable housing they are further disadvantaged in the labour market.

Sole parent families have been the income unit type most at risk of poverty since 1981–82. Both 'before housing' and 'after housing' poverty rates have been consistently much higher than any other income unit group. One exception is that of single people under 25 who, in 1995–96, had a higher 'after housing' poverty rate than sole parents with one child.

Overall this points to young people who are sole parents as a highly vulnerable group.

Poverty and disadvantage are the end result of structural arrangements that create this degree of socio-economic vulnerability. In order to address the disadvantage of the most marginalised, many of whom are homeless or 'at risk' of homelessness, it is essential that there is systemic reform, the least of which must be to ensure that this group of young people has access to a safety net like SAAP. In order for SAAP to respond effectively and efficiently realistic benchmarks which enable best practice must be established and the necessary resourcing allocated.

5. Access to Housing

Fopp (1997) states that,

"supported accommodation services are in danger of becoming de facto housing options for many young people who do not need support, simply because there are few housing alternatives."

The complexity of SAAP service delivery is further impacted upon by:

- ♦ Lack of low/cost affordable housing for independent young people

- ◆ Young people who have reached a point where they are ready for independent living cannot do so
- ◆ Services are cross-subsidising by accommodating high and low support needs for financial viability purposes
- ◆ Young people who need supported housing are missing out or waiting for long periods of time to access
- ◆ Young people under 18 are unable to access public housing

There is a shrinking private market and little affordable housing in the lower end of the market and much of this is consumed by people who traditionally would have purchased their own home and cannot do so.

As there is a decrease in the lower end of the private rental market the 'CAP dollar' will be able to 'buy' less every year, with the net result being a shrinking of the CAP resource base. There is a need to increase the development of low cost housing. More funds need to be provided to public and social housing providers to increase the affordable rental options for low-income households.

6. Whole of Government Approach

It is critical that government's move towards recognition that it is essential that Government works as a cohesive unit both at State/Commonwealth level and interdepartmentally. Issues for young people in SAAP cross a range of responsibilities including:

- ◆ Education
- ◆ Families, Youth and Community Care
- ◆ Health
- ◆ Employment and Training
- ◆ Justice
- ◆ Child Protection
- ◆ Housing

both in the State and Federal jurisdictions. Until such time as there is recognition that the structural/policy and systemic issues impacting on young people in SAAP cross the gamut of responsibilities there will continue to be gaps in responses to this group and the benchmarks for best practice for SAAP services will remain academic.

SECTION 4: NON ENGLISH SPEAKING BACKGROUND YOUNG PEOPLE

The scope and concerns regarding NESB Young people and accommodation have been well documented in recent years (O'Connor et al. 1994) & innovative practices developed (Nguyen 1997) as a response to the needs of NESB young people.

Yet NESB young people still feel the impact of social isolation and marginalisation and the live a variety of factors that increase these young peoples vulnerability to homelessness and securing an adequate response to their situation.

Recent Research (Kids Help Line 2000) notes that leaving home and homelessness is the 8th most frequent reason NESB young people contact Kids Help Line and of those who call,

40% had already left home, a third of which had somewhere to stay and two-thirds had nowhere to stay. Reasons given for leaving home include family conflict and child abuse. ... A further 14% phoned to talk to a counsellor because they were told to leave their home while 6% were severely distressed or at risk of harm as a result of being homeless.

The increasing number of unaccompanied minors arriving in Australia and the recent creation of Temporary Protection Visa status for some refugees is also an increasing environmental concern impacting on SAAP services. Added to this are a number of punitive changes to Government Policy relating to accommodation, Centrelink, health, etc which also impact on SAAP services as people in this category have no access to public housing and have difficulty negotiating for community housing.

These changes are having a flow on effect in the sector – some services to NESB youth which were established as information and referral service's, have become more and more service delivery services from the perspective of material assistance – feeding, housing, intensive case support – brokerage of accommodation options for those in crisis.

Yet a number of crisis services are unable (or unwilling) to support these NESB young people either because they have no access to employment, Centrelink, or difficulties in language, or because it is impossible to provide "short term" housing options. It needs to be noted that what is safely "short-term" for young Anglo's is by the complex nature of NESB young people's issues "long-term" housing and support for a young NESB person.

And the reality remains that NESB young people have a very low rate of using and participating in services that exist to assist all young people, and that numerous barriers still prevent them from accessing and using youth accommodation services. These barriers still include racism, a lack of knowledge about welfare or youth services, lack of

English language proficiency, and a lack of cultural understanding and sensitivity by services.

Recently the document, *Cultural and Linguistically Diversity in SAAP – A Strategy for the supported Accommodation Assistance Program and Policy and Practice Guidelines for SAAP* services has sought to improve policy and program development and service delivery responses to cultural and linguistic diversity in SAAP services. While the document outlines FYCCOQ's commitment to ensure that the cultural and linguistic needs of SAAP clients are taken into consideration for the purpose of policy and program development and services deliver, much more needs to be done to ensure the adequate resourcing of SAAP services, to enable an effective response to the needs of NESB Young People.

We believe that if other things in the above submission were addressed, (eg: not needing to pay, implementation of cultural guidelines, adequate funding for SAAP/CAP services, etc) a number of access and equity issues in regard to SAAP services and NESB young people would be rectified and NESB young people in crisis would be able to access and have the benefit of SAAP services as upheld in the Principles underpinning SAAP IV.

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