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1. About CHP

The Council to Homeless Persons (CHP) is the peak body representing individuals and organisations with an interest or stake in homelessness in Victoria. Our mission is to work toward ending homelessness through leadership in policy, advocacy and sector development.

CHP also incorporates the Homelessness Advocacy Service (HAS), which provides individual advocacy to people who are homeless or at risk, as well as training and consumer participation through the Peer Education Support Program (PESP). PESP is a consumer advocacy group where members are trained and supported to provide input into sector practice, community education and policy development.

1. Introduction

CHP welcomes the opportunity to make a submission to the Methodological Review of Counting the Homeless, 2006 (the Review).

CHP and the homelessness services sector (the sector) would both agree that reviewing methodologies is an important element of retaining confidence in homelessness data.

Having evidence-based measurements of homelessness is critical to our work in ending homelessness for several reasons. First the data allows us to track trends in homelessness over periods of time in order to evaluate and improve our practice. Secondly the data allows policy-makers at all levels of Government to make informed decisions about solutions to homelessness. Thirdly good data drives innovation. It provides evidence for ending homelessness and motivates services and policy makers to replicate best practices.

CHP acknowledges the various challenges in measuring homelessness. The Census is an inherently difficult tool to use because it does not ask a direct question about ‘homelessness’. Therefore estimates are derived from assumptions drawn from other Census data. The very nature of the homelessness experience can also lead to undercounting, particularly among people sleeping ‘rough’ (outside), on a friend’s couch, or among families fleeing violence.

Despite these difficulties, the Census is one of the few tools available, and Professors Chris Chamberlain and David MacKenzie have delivered new and innovative ways to use the Census to measure homelessness in the Counting the Homeless (CTH) reports.

Given the importance of homelessness figures, and that the Census is the most comprehensive measurement tool available, CHP remains committed to working with the Australian Bureau of Statistics (ABS) and the sector to ensure any methodologies employed produce accurate figures.

As in previous communications, the sector has expressed disappointment about its lack of participation earlier in the review process. The sector collectively holds enormous ‘practice
wisdom’ regarding the nature of the homelessness experiences which is invaluable to constructing methodologies to enumerate homelessness.

CHP appreciates recent efforts by the ABS to engage the sector in the Review process and for the commitments that were made by the ABS at the 24 May workshop. This includes a promise to:

- Develop a reference group on homelessness measurement;
- Identify areas for further work in an interim report to be released 31 July;
- Undertake work on the key areas raised with the reference group and other key stakeholders; and
- Seek funding to scope a youth quality study into measuring homelessness among young people.

2.1  **CHP’s Submission**

CHP hosted a Sector Consultation in Melbourne on 6 June 2011 to seek feedback on the key tenets of the Review. The event was attended by 110 people, which included people who have experienced homelessness, researchers, services providers, federal bureaucrats and peak body representatives from across Victoria. The feedback from the Consultation informed CHP’s recommendations and this feedback is peppered throughout the Submission.

This submission provides an organisational response to the Review under four major headings:

- Recommendations for ongoing reviews of the methodology
- ABS methodological review: sector response and key recommendations
- Recommendations for additional area to review
- Other options for improving homelessness counts

2. Recommendations for ongoing reviews of the methodology

Reviewing methodologies is important for retaining confidence the data that is available regarding homelessness in Australia. CHP welcomes the Review into CTH and seeks to ensure the review is ongoing and involves all relevant stakeholders.

2.1  **Include key stakeholders on homelessness measurement reference group**

CHP welcomes the ABS’s commitment to developing a reference group on homelessness measurement. Given that this group will guide the ABS work program on issues related to homelessness, sufficient representation from specific areas will be required for the group to achieve the best outcomes. CHP is of the view that the group should not be too large, but must include a (n):

- Person who has experienced homelessness;
- Researchers and academics with expertise on homelessness and Indigenous communities, family violence and young people;
- Representative from Homelessness Australia;
- Representative from the homelessness services sector;
• Prime Minister’s Council on Homelessness representative; and a 
• Council of Australian Governments (COAG) Reform Council representative.

3.2 Develop a ‘continuous quality assurance’ plan

Trends in homelessness are constantly changing. The ABS must be deliberate about protecting the integrity of the data that is collected. The reference group and ABS should develop, and then meet regularly to monitor, a Continuous Quality Assurance Plan. The plan should provide a strategy for:

- how and when the validity of the methodology will be tested; and
- how data will remain timely, accurate and consistent over time.

3.3 Consider an independent analysis of the Census data

The Review highlights the many challenges involved in both capturing and generating statistics on homelessness. The nature of the homelessness experience means people in this group are at higher risk of being excluded from the Census collection. Additionally, the tool itself does not produce data on the classification of homelessness; therefore sophisticated assumptions must be made about other data in the Census to determine who is homeless.

Because of these challenges, the methodology used to construct the figures will be inherently complicated and complex. CHP urges the ABS to acknowledge the need to include academic experts on homelessness in the construction of homelessness estimates. In order to ensure the methods used are valid, CHP recommends partnering with a homelessness researcher to analyse the Census data and provide feedback on official measurements.

3. ABS Review: sector response and key recommendations

3.1 Boarding houses

The Review examined people who were counted as homeless under the ‘boarding house’ classification in the *Counting the Homeless* (CTH) report. The Review excluded from the ‘boarding housing’ homelessness count, people who were in a dwelling that they assumed was a ‘group house’, where:

- Less than 5 people provided information related to the five CTH rules for identifying boarding houses (i.e. there were not 5 people with whom to test the CTH boarding house rules);
- 60 per cent or more of the residents were full time students or religious volunteers;
- A real estate agent is the landlord;
- A person was paying mortgage repayments or reporting they are in a rent-to-buy scheme; and or
- A person is paying rent to a parent.
The ABS also created a new category of homelessness. The Review moved 1970 people who reported having ‘no usual address’ from the boarding house category to a new ‘non-private’ dwelling classification, including:

- 544 people in hotels or motels who had low incomes and were unemployed
- 1,436 people in staff quarters, halls of residence, and public and private hospitals

**Sector feedback on boarding houses:**
CHP agrees with some members of the sector who stated that in order to identify people living in boarding houses, there must be information about at least five of the unrelated residents of the house. If this does not occur, there will not be enough data to test the boarding house rules and those members should not be included in the boarding house count.

Several people highlighted the need for additional research into students living in rooming houses. There have been several reports of students, particularly international students, living in overcrowded and substandard accommodation. In some instances the Census data does reflect full-time students living in residential halls and CHP does not consider them to be homeless. However in other circumstances these are students who would be classified as homeless using the cultural definition. According to the sector:

- Many full time students, particularly international students, are at risk of homelessness. The assumption that they are ok is incorrect. They often live in overcrowded accommodation, have very low incomes and sometimes have to choose between buying food or paying the rent.

CHP agrees with several members of the Sector that it is not valid to assume that if a real estate agent is the landlord of a property then the property in not ‘boarding houses’.

**Feedback from the sector suggests that:**

- Real estate agents are often landlords of boarding houses in Victoria.
- A local council has experience with boarding houses managed by real estate agents.

Members of the sector also shared concerns about the ABS revision to remove people from the boarding house count if the parent was the landlord as this assumes that the young person is staying in the family home. The young person may actually be homeless and staying in a boarding house.

Several people also alluded to the difficulties in identifying boarding houses, particularly those that are unregistered. CHP acknowledges the extra effort by the ABS in this area.

**Sector feedback on new category of homelessness:**
CHP supports tracking people who are homeless but are not staying in boarding houses in a separate category. There is also agreement that people who are homeless and staying temporarily in hotels and motels should be included in a separate category, as these people are experiencing secondary homelessness.
CHP also agrees with the sector that there may be other groups captured in a separate category of homelessness and this deserves further consideration and review, including:

- People who are homeless staying temporarily in institutions, ie, hospitals and prisons
- People staying in caravans (this issue will be explored in section three).

**Key Recommendations:**

- Undertake a review of student housing and homelessness (see section three);
- Undertake a review of people living in caravan parks (see section three);
- Include all people who are staying temporarily—for 90 days or less—in institutions (jails/prisons, hospitals, psychiatric facilities etc...) and were homeless before entering, in the homelessness count; and
- Test new assumptions made about people removed from the ‘boarding house’ count.

## 4.2 Staying with friends and relatives

The Review looked at people who were classified in the CTH report as ‘staying temporarily with friends and relatives’. The Review removed people from the count who were *not* staying with friends and relatives and who they believed—based on a variety of assumptions about the Census data—were *not* homeless but are people travelling throughout Australia.

The review excluded people from the following groups:

### ‘Grey Nomads’:

The ABS made the assumption that people who were age 55 or older, not in labour force and staying in caravans, cabins or houseboats on Census night were *not* homeless but were considered ‘grey nomads’. The ABS concludes that (ABS Discussion paper, page 40-41):

- These people are exhibiting “post-retirement behaviour”
- “The great majority of [these people] were enumerated in holiday destinations”;
- “There is no evidence in the Census data to suggest that these people are homeless.”

The ABS has also reported to CHP that 88 per cent of the ‘grey nomads’ removed from the count owned their caravans, cabins, or houseboats; 84 per cent were 2 person households—one male and one female; and the majority were staying in ‘tourist destinations’.

### Travellers:

The ABS excludes people from the homelessness count who are renting a house or an apartment, caravan, cabin or houseboat and who reported usually being residents elsewhere in Australia in the previous Census.

### People in a ‘holiday’ or ‘second’ home:

The ABS excludes people from the count who are staying in properties they owned outright or where they reported paying a mortgage. It is assumed that they are staying in holiday home or a second home.

The ABS also let CHP know that out of the ‘travellers’ that were excluded from the count and ‘renting property’, 45 per cent were renting a separate stand alone house, 14 per cent were renting a town house and 39 per cent were in a flat, unit or apartment. In addition, the ABS is working to include a question about owning multiple properties in the next Census survey.
Summary of feedback:
CHP urges the ABS to look more closely into this group of people who reported not having a usual address and are not staying with friends and relatives. These people should not be categorised as ‘staying temporarily with friends and relatives’ but, as was stated by the ABS (page 41), a portion of the people in this group could be homeless.

CHP agrees that people who rent or own a home are not homeless. However some of the people who were removed from this category are in caravans, cabins and houseboats. The ABS assumes that they are travelling by choice, however, for a variety of reasons these people may have no other permanent affordable housing options. Similar statements were echoed by the sector, some of which are summarised below:

- There are assumptions made about the options available to ‘grey nomads’. They have made the decision to downsize because they can not afford to maintain housing.
- ‘Grey nomads’ may have lost the ability to enter the housing market and are potentially left homeless.
- The ‘grey nomads’ removed from the count could be people who are homeless and fleeing violence or people moving interstate looking for seasonal Employment.
- The Gold Coast is full of caravan parks with people on low incomes.

The ABS claims that “It is possible that some of these grey nomads were homeless and were travelling for lack of somewhere permanent to live...there may be anecdotes to support this contention, but the case is not strong enough to classify them all as homeless, and it is likely that most are not homeless” (ABS Discussion Paper, page 41).

CHP urges the ABS to test the ‘grey nomad’ assumptions by undertaking research into caravan parks and by harnessing other data to get a more accurate reflection of the circumstances of the people in this group.

Key Recommendations:
- Undertake a review of people living in caravan parks (see section three); and
- Test new assumptions about people living in caravans, cabins and houseboats in holiday destinations.

4.3 New Migrants

The ABS excludes people from the CTH ‘friends and relatives’ category who appear to be new migrants including:

- 1,309 people, the majority of whom were from New Zealand, China, the USA and UK. The ABS concludes that the people in this group are likely to not have humanitarian visas. It is assumed that most of these households are families who, at the time of the Census, had not yet decided upon the purchase or rent of a particular dwelling and report no usual address.
837 Australians who had been overseas the year before and were renting a property on Census night but reported ‘no usual address’ because they have not yet lived in the same location for six months.

**Sector feedback:**

CHP contends that ‘new migrants’ to Australia are homeless under the cultural definition if they are:

- staying with friends and relatives and
- due to any number of challenges, have not been able to rent or buy a home, and
- they do not consider that to be their usual address.

CHP does not support the inconsistent use of the cultural definition of homelessness while constructing official estimates of homelessness. If there are changes to the definition, those must be made as part of a broader review of the cultural definition, in partnership with all relevant stakeholders.

Several members of the sector were concerned with the exclusions of these ‘new migrants’ from the homelessness count. This was given particular emphasis regarding removal of people moving here from New Zealand. Services cited several examples of people from New Zealand, who have recently moved to Australia and are homeless because of family violence, barriers to accessing income support and child care expenses. Other sector feedback is summarised below:

- Some people who are new to Australia have ‘bridging visas’, which means they have been in Australia for six months or less and are ineligible for services, which could lead people in this group to become homeless.
- People who are moving to Australia or returning to Australia could have an extremely difficult time finding low cost accommodation. Many of them will experience homelessness and will be forced to stay with friends and relatives while they are looking for a permanent home. These people are homeless under the cultural definition.

**Key recommendations:**

- Use the cultural definition of homelessness consistently throughout the Census data analysis

### 4.4 Young People

The Review removed over 16,500 young people from the homelessness count who reported a ‘usual address’ on Census night, but were staying temporarily at another household.

The ABS concedes that some of the young people they removed could be homeless, but there is no evidence in the Census data to suggest that they are (ABS Discussion Paper, page 42-45). The ABS assumes that these young people are:

- Travelling with parents
- Travelling with another young person
- Visiting grandparents
- Visiting a holiday destination
The ABS reported that they are not in favour of using the National Census of Homeless School Students (NCHSS) to ‘estimate up’ the number of young people who are homeless due to aspects of the methodology.

CHP is of the view that in the absence of additional research and data, a significant number of the young people who meet the cultural definition of homelessness are likely to be excluded from the homelessness count.

The majority of young people who are homeless are staying temporarily with friends and relatives or ‘couch surfing’. Many of these young people would not consider themselves to be ‘homeless’ and would not state that their friend’s house is where they usually live.

As a result, young people who are couch surfing on Census night are likely to indicate that they ‘usually live’ at the address of their family home. There are also a large portion of young people who, because they are couch surfing, will not complete a Census form at all and will be missed in the Collection.

CHP has raised these concerns extensively with the ABS and welcomes the recent commitment by the ABS to scope a quality study into homelessness among young people. It is reassuring to know that the ABS will work with the ‘homelessness measurement reference group’ to develop a sound measurement tool. Given how critical a youth survey is in gathering accurate data, CHP urges the ABS to include experts on youth homelessness on the reference group.

CHP also supports the views of those in the sector who agree that many of the young people the ABS assumes are travelling with their families are likely to be homeless. The ABS targeted these young people because they reported on the Census survey that they had a usual address elsewhere in Australia. Therefore CHP urges the ABS to work with the reference group to continue to refine homelessness counts among groups such as ‘young people’, who are likely to report having a usual address elsewhere in Australia, but are homeless under the cultural definition.

Sector feedback:
Several members of the sector provided examples of how young people are misrepresented in the Census data:

- Often young people who are forced to leave home and are staying at a friend’s house do not identify as homeless. There is often a stigma attached to being homeless which makes it less likely that these young people will report that they are homeless on the Census form.
- If young people are traveling around because they are homeless, they will still typically report their parent’s address as the usual address on the Census form.
- Many young people who are homeless will be missed because they are simply not involved with any services, apart from a school welfare worker.

Key recommendations:

• Work with the reference group to undertake a quality study to develop a valid tool for measuring homelessness among young people;
• Ensure the reference group includes an expert on youth homelessness; and
• Undertake a larger youth Census based on findings of the quality study.

4.5 SAAP accommodation and Transitional Housing

CHP supports the ABS decision to use SAAP data in conjunction with the Census figures to count people who are accommodated in SAAP properties on Census night. This is a good example of how other data can be harnessed and cross-checked with the Census in order to secure more accurate figures.

CHP holds a strong view that people being accommodated in Transitional Housing are homeless and must continue to be included in homelessness estimates. Transitional Housing is one part of the continuum of services available to assist people who are homeless to find permanent housing. People should be considered homeless until they have moved into permanent appropriate housing.

Key recommendations:
• Work with the homelessness reference group to identify additional sources of administrative data to use in conjunction with SAAP; and
• Continue to count people in Transitional Housing as homeless.

4.6 Improvised dwellings

The Review proposes to exclude people who would appear to be living in improvised dwellings who the ABS believes do not fit the cultural definition of homelessness because they are:

• Hobby farmers living in sheds on their own property
• Owner-builders living in sheds on their own property, and
• Construction workers living temporarily in sheds on a build site.

Sector feedback:
CHP agrees with the very strong views of the sector regarding the need to be able to count people who are homeless because they lost their home by natural disasters, including those affected by the bush fires and the recent floods.

These people may be excluded from the count because they are likely to be on property that they own, staying in an improvised dwelling and are likely to report that they are at their usual address.

The ABS must use other sources of data in the Census or ‘real time’ data to ensure these people are counted as homeless. Additionally, it would be helpful for policy-makers and advocates, if those people were tracked separately to ensure adequate investments are made in recovery efforts.
CHP also agrees with the sector that more work is needed in the area of ‘marginal housing’ to determine a minimum standard for the accommodation described above.

The ABS reported that they would use real time data to determine the locations of construction sites. CHP supports excluding workers at those sites from the count, but urges the ABS to continue to count them in a separate category of marginal housing so that these trends can continue to be monitored.

In addition, if the ABS determines, after further research into ‘marginal housing’ that people who are ‘owner builders’ and ‘hobby farmers’ are homeless, CHP urges that this group continue to be tracked under the category of ‘marginal housing’.

Key recommendations:
- Undertake a review of ‘marginal housing’ to determine a minimum standard;
- Use additional data to count people who have lost their homes in natural disasters as homeless; and
- Continue to track any of the people excluded from the improvised dwelling category under a ‘marginal housing’ category.

4. Recommendations for additional areas to be reviewed

CHP and the sector have identified important areas that should be examined as part of the ABS methodological Review. Given recent reports that the Review will be extended, we recommend that work be undertaken over the next several months in the following areas:

4.1 Examine residents of caravan parks and marginal housing

CHP supports the view that all people staying in caravans temporarily for crisis accommodation are homeless. The ABS should work with experts in each region to ensure all of these people are captured in the homelessness count on Census night.

Further research is required however to clarify whether or not people living in caravan parks (or other forms of marginal housing) are homeless. In order for the ABS and the sector to come to a decision on this matter, CHP recommends a detailed study into caravan parks that scopes:
- Security of tenure;
- Minimum quality standards; and
- Qualitative research into residents of caravans and whether they would identify as homeless under the cultural definition.

CHP consulted with the sector about whether or not people living in caravans should be considered homeless. Below is a summary of responses:

- Residents of caravan parks need to be reviewed significantly and ABS needs to revisit this count
It would be easy for the sector to identify those caravan parks used as crisis/transitional accommodation in Victoria. Caravan park residents must be included in the homelessness count as almost 40 per cent of Hume Housing Establishment Fund (HEF) is spent on accommodating clients in caravans and the numbers are even higher in rural and regional areas. The ABS review should do more research into the circumstances and tenure of people staying or living in caravan parks.

5.2 Examine people experiencing homelessness, likely to report ‘usual address’

Indigenous persons, young people and families fleeing violence

There are specific groups of people who are likely to report that they have a ‘usual address’ despite meeting the cultural definition of homelessness. These are mainly people who are staying with friends and relatives or in boarding houses. The ABS should do further research into the following areas.

Indigenous communities:
There is likely to be a significant portion of Indigenous Australians experiencing secondary homelessness—staying with friends and relatives—who are missed in the Census collection.

Based on consultation with the sector, CHP believes this is due in large part to the cultural obligation, which is of considerable importance in Indigenous communities, to accommodate relatives. Indigenous people who are experiencing secondary homelessness are likely to report that they are at their usual address and will be missed in the homelessness count. This is an issue for indigenous Australians living in both rural and metropolitan areas.

Chamberlain and Mackenzie have also acknowledged that the numbers arrived at in the CTH reports do not accurately capture secondary homeless or the problem of overcrowding among Indigenous communities.

The ABS research into the health and welfare of Australia’s Indigenous people found that there were 102,400 Indigenous people living in overcrowded households in 2006. Therefore the Review’s estimate that 872 Indigenous Australians were staying with friends and relatives on Census night in 2006 seems quite unrealistic and deserves more attention.

It is obvious given the severity of overcrowding among this population that more work needs to be done to determine how best to count people who are homeless in overcrowded situations but report having a usual address.

CHP urges the ABS to lead more work in this area. It is also very important that relevant Indigenous agencies are involved in the Review to determine how homelessness disguised as overcrowding can be more easily identified.

Families fleeing violence:
A large portion of families fleeing violence could be missed in the Census collection. If a
woman has escaped a violent partner and is staying in a boarding house, she very well may report that she has a usual address elsewhere in Australia...because she does. Therefore she will not be included in the homelessness count.

CHP recommends that the ABS works with the ‘homelessness measurement reference group’ and relevant family violence experts to determine how best to enumerate homelessness among this group.

**Young people**

As stated above, CHP welcomes the work that the ABS has committed to undertake to scope a quality study into youth homelessness. We look forward to continuing to work with the ABS and the sector to implement a sound methodology for constructing more realistic youth homelessness figures.

5.3 **Scope new homelessness-related Census survey questions**

The Census data will inherently produce an undercount because it does not ask a question on the classification of ‘homelessness’. CHP acknowledges that specific homelessness-related questions have not been added to the Census to date because:

- Many people who are homeless would not identify as being homeless; and
- It is very difficult to add a question to the Census survey, as there is evidence that people will only tolerate answering a certain number of questions. Typically when a new question is added, another is deleted. Therefore is takes a lot of time and money to scope the risks and benefits of adding new questions to the Census survey.

While we understand these challenges, CHP believes that scoping new Census homelessness-related questions must be included in any review of the methodology used to enumerate homelessness.

In preparation for the next Census in 2016, we recommend that the ABS begin research into adding new questions as soon as possible.

5.4 **Identify other sources of data for constructing homelessness estimates**

For several reasons highlighted in this submission, the Census is a challenging tool for measuring homelessness accurately. We also know that particular groups will undoubtedly be missed in the Census collection due to the nature of the homelessness experience.

CHP calls on the ABS to make a clear report of the shortcomings in the use of the Census for estimating homelessness. It should also identify other sources of data that can be used in conjunction with the Census to construct official estimates of homelessness.

CHP asked the sector for input into possible sources of data that could be used for the count and below is a summary of responses:

- Centrelink data should be used to construct accurate counts, however this should be done with caution, as the mechanism in place for identifying people who are homeless in the Centrelink data relies on a self-report from the client.
This is a ‘homelessness indicator’ which is less reliable than a ‘homelessness flag’ that is automatically included in the data if a client has specific characteristics.

- The analysis of Census data could be used in conjunction with research into people who are applying for services and on waiting lists for services.
- In addition to imputing SAAP data, the analysis of the Census data could look at data from other generalist youth services to identify young people who are homeless.
- The Review should examine what types of Child Protection data should be incorporated to identify young people currently resident in or leaving state-care who are homeless.
- Many times people in Transitional Housing or SAAP accommodation are aware of other people who are homeless and staying with a friend or relative in another unit at the same property. Census collectors could do more work with people who are homeless in those properties to identify others who might be homeless but are likely to be underreported.

5.5 **Examine students and seasonal workers in substandard accommodation**

Several members of the sector have identified two additional areas that deserve further review.

The first issue is reviewing how best to capture full time students who are homeless. As stated above, services are assisting an increasing number of full time students, particularly international students, who are staying in very overcrowded or substandard rooming-house type accommodation. Many would argue that these people are considered to be homeless within our cultural framework. However, the CTH methodology excludes these people from the count because they are living in a dwelling that they would identify as a ‘hall of residence’, where the majority of the residents are full time students.

The second issue raised several times by the sector related to ‘seasonal workers’. They report knowledge of more seasonal workers on very low incomes staying in substandard accommodation due to the nature of their employment. Using the CTH methodology they would not be included in the homelessness count if they reported having a usual address overseas. Some services report that a number of these people are living in very poor conditions but may not have money to travel home and should be considered homeless.

CHP recommends that further work should be undertaken to determine how to capture homelessness among these groups and how they will be identified in the Census data.

5. **Other options for improving homelessness counts**

There are three final issues that are important and worth mentioning, although they sit outside of the ABS Review of the CTH methodology.

6.1 **Administrative data on homelessness**
Better administrative data on homelessness in Australia is required. CHP welcomes the new Specialist Homelessness Data Collection system that will be implemented in 2011. The new system will record and store client-level information on the characteristics and service needs of people who are homeless. It is critical that this system allows us to:

- obtain better information on the extent of and trends in homelessness;
- produce more frequent, unduplicated point-in-time counts of people who are homeless (so that we are not relying solely on Census data); and to
- measure the effectiveness of government, community and organisational responses to homelessness.

In order to enable the new system to collect the best data possible we recommend:

- That it is streamlined with data from all other homelessness-related programs, including Transitional Housing and other crisis response and housing programs;
- Ongoing training and education within the sector about (a) collecting data, (b) using data to improve practice and (b) continuously improving the quality of the data that is collected;
- Requiring all services that assist people who are homeless to collect data on homelessness; and
- Ensuring the data elements used can track why people become homeless, what homelessness and mainstream assistance they receive, what is effective in ending their homelessness permanently and the financial costs involved.

6.2 Review of the cultural definition of homelessness

Several of the issues raised in CHP’s submission to the Review relate to how homelessness in Australia is defined. The ABS uses the cultural definition of homelessness to enumerate the homeless population on Census night. The cultural definition, developed by Professors Chris Chamberlain and David Mackenzie, has been the widely accepted definition by governments and the sector for over 15 years.

However several members of the sector made recommendations for including specific groups of people in the homelessness count who they feel are missing from the homelessness definition (i.e. residents of caravan parks, or people who are homeless and staying temporarily in institutions). In addition, the ABS proposed creating a new category of homelessness to separate people from the boarding house classification who are staying in other non-private dwellings (i.e. hotels and motels).

To sufficiently respond to these matters, a review of the definition of homelessness may be necessary. A review of the definition would be outside the scope of the ABS review and should be undertaken by experts in the field including academics, researchers and members of the homelessness sector.

6.3 Ongoing training and education

The second important issue to consider is ongoing training and education on Census data collections. CHP is committed to continuing to partner with the ABS on a comprehensive

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communications strategy about the Census and filling out Census forms correctly. The sector had additional ideas for improving the count, some of which are already under consideration by the ABS:

- Continue and expand the practice of engaging leaders in Culturally and Linguistically Diverse (CALD) communities to assist people to complete Census forms correctly;
- Do more work to ensure people who are homeless who can not read are assisted to fill out Census forms;
- Provide clear, simple information to Census respondents about how to answer the ‘usual address’ question; and
- Utilise more experts in each of the Regions to identify rooming houses and locations where people ‘sleeping rough’ are staying.

6. Conclusion

In conclusion CHP would again like to thank the ABS for the opportunity to contribute to the *Methodological Review of Counting the Homeless, 2006.*

After enduring efforts by many passionate advocates, including Victoria’s Regional Network Coordinators and Homelessness Australia, the ABS has engaged the sector in the Review process. After several meetings and consultations with key stakeholders, many of the concerns raised in this submission have been validated by the ABS. CHP appreciates the ABS commitment in identifying shortcomings in the use of the Census data and looks forward to continuing to work with the ABS to address those concerns.

Accurate data is critical to our work in ending homelessness and CHP is committed to ensuring methodologies employed to construct homelessness measurements are robust and evidence-based.