



Home Stretch WA

Financial Governance Policy: Staying On Subsidy and Housing Allowance

August 2023

Contents

1	Purpose	3
2	Scope	3
3	Definitions	3
4	Background	6
5	Eligibility	7
	Eligible living arrangements – Staying On Subsidy	7
	Eligible living arrangements – Housing Allowance	7
	Living arrangements ineligible for a Housing Allowance	8
	Right to Appeal Decisions Regarding the Eligibility of Living Arrangements	8
6	Approval of applications	9
	Role of Home Stretch Providers – Develop and Endorse	9
	Role of Department of Communities – Approve and Authorise Payment	10
7	Payment terms and conditions	10
	Commencement of Payments.....	11
8	Controls to reduce risk of overpayment or fraud	12
	Staying On.....	12
	Housing Allowance.....	13
9	Termination of payments	15
10	Resources	15
11	Related policies and case practice guidance	16
12	Document control	16
13	Amendments	17

1 Purpose

The purpose of this policy is to outline the governance of financial payments that are provided to subsidise safe and stable living arrangements for young people who are engaged with a Home Stretch WA provider.

Home Stretch WA provides young people leaving out of home care at 18 years of age until they reach 21, with financial assistance to continue living with a carer under a Staying On Agreement, or to find and maintain other affordable housing options through a Housing Allowance.

2 Scope

The Department of Communities has a legislative responsibility under the *Children and Community Services Act 2004*¹ (the Act) to provide support to young people who are eligible to assistance under s.96 of the Act, are leaving or have left out of home care and are under 25 years of age.

This policy is applicable to young people entitled to assistance (under s.96 of the Act) aged between 18 and 20 years who engage in the Home Stretch WA program.

Young people who were placed on a protection order (special guardianship) before they turned 15 years old are not eligible for leaving care assistance or the Home Stretch WA program due to not meeting legislation requirements under s.96 of the Act.

Young people aged from 17 ½ until they reach 18 who are engaged with a Home Stretch WA provider (as part of the 'smooth transition' phase) are still under the care of the Department of Communities and must be provided financial support through a District Office to find and maintain an appropriate placement or living arrangement.

3 Definitions

Term	Definition
Housing Allowance	<p>A fortnightly payment for a young person who is leaving residential care or who does not wish to, or is unable to, stay on with their carer, or is in another type of living arrangement.</p> <p>The payment is to support the young person find and maintain suitable and affordable housing. The payments are not paid directly to the young person.</p>

¹ *Children and Community Services Act 2004*: Part 4, Division 6 – Provisions about leaving the CEO's care.

Term	Definition
Staying On Subsidy	<p>A fortnightly payment made directly to the Staying On carer to support the young person to continue living with them up to the age of 21. It is not a payment to increase or supplement a young person’s income.</p> <p>The subsidy is paid to help ensure the young person’s basic needs can be met, and to support the family to continue to provide a home for the young person.</p>
Staying On carer	<p>A foster or family carer who the young person continues to reside with after they turn 18 and leaves the out of home care system. For the young person it means they do not have to leave their carer’s home until they reach 21, or when they are ready to move on.</p>
Payment recipient	<p>The person or organisation (through an authorised representative) who receives the Housing Allowance or Staying On Subsidy payment.</p>
Home Stretch WA provider	<p>A community service organisation or Aboriginal Community Controlled Organisation funded by the Department of Communities to deliver the Home Stretch WA program.</p>
Home Stretch WA Coordinator	<p>The program coordinator of a Home Stretch WA provider who manages a team of staff to deliver the program to young people in a specified region.</p>
Home Stretch WA Staying On Facilitator	<p>A dedicated role within a Home Stretch WA provider who supports the Staying On carer and young person to ensure the living arrangement extended under a Staying On Agreement is successful. The Staying On Facilitator works more closely with the carer, while the Transition Coach is focused on supporting the young person.</p>
Home Stretch WA Transition Coach	<p>A consistent and reliable youth worker who works with the young person to provide flexible, one to one support focused on coaching towards independence. The Transition Coach is pivotal in helping the young person find and maintain suitable accommodation and access the Staying On Subsidy or Housing Allowance to support the living arrangement.</p>

Term	Definition
	Transition Coaches are employed by the Home Stretch WA provider.
Smooth transition	The period of working together (District Office child protection worker, Transition Coach and support circle) with a young person from the age of 17½ years to ensure a smooth transition into the Home Stretch WA program at 18.
Invest In Me	Financial brokerage available to each young person supported by a Home Stretch WA provider to help them reach their goals or overcome unexpected emergencies. Invest In Me funding is delegated to a Home Stretch WA provider and typically replaces a young person’s need to access the Department of Communities’ Leaving Care Fund.
Staying On Agreement	A social contract between the young person, their Staying On carer and the Home Stretch WA provider that sets out the details of how things should work in the living arrangement that is being supported.
Living Arrangement Agreement	A social contract between a young person and the people/person they reside with that sets out the conditions for how things should work in a living arrangement supported by a Housing Allowance.
Housing tenure	The legal right to occupy a dwelling or living arrangement. Tenure is determined according to whether the person owns the dwelling outright, owns the dwelling but has a mortgage or loan secured against it, is paying rent to live in the dwelling, or has some other arrangement to occupy the dwelling. Housing tenure includes Lease, Boarding or Lodging Agreements, or any other written agreement.
Primary place of residence	The housing or living arrangement which the young person is living in for most of their time, and where they maintain a right of abode.

4 Background

Most young people in Western Australia are still living at home with their parents at 18 years of age, receiving continued support and guidance at this critical stage of life.

For young people in care, turning 18 can be a challenging and disruptive time, with limited support resources to help navigate major life transitions such as finishing high school, career planning or seeking housing.

Home Stretch WA was co-designed with young people to provide them with the choice to access higher levels of support and assistance from the age of 18 until they reach 21, helping to create a more gradual transition into adulthood.

Young people who wish to engage in the program have access to individualised one to one support and a safety net that includes financial support and resources. This includes a Staying On Subsidy to support them to continue living with foster or family carers, or access to a Housing Allowance that can be used to subsidise a broader range of housing options, and Invest in Me funding to support them towards their aspirations and goals or for crisis relief.

The practice approaches that constitute the Home Stretch WA model were extensively co-designed and tested with young people, carers, Aboriginal community, child protection workers, academics and practice experts as part of the Home Stretch WA Trial. These approaches have been further refined through the Home Stretch WA Community of Practice to incorporate an understanding of how to implement at scale, as well as incorporating an understanding of the unique needs of some regional contexts.

The Staying On Subsidy and Housing Allowance are new features of the out of home care system and requires a robust policy framework to ensure broader implementation remains consistent with the co-designed model.

This Financial Governance Policy is underpinned by the principles created through the Home Stretch WA co-design process, helping to ensure where decision making requires an element of discretion, it is always guided by principles that communicate the agreed intent of the model.

5 Eligibility

Only young people who have opted into Home Stretch WA and are actively supported by a Home Stretch WA provider are eligible to apply for the Staying On Subsidy² or Housing Allowance.

The Staying On Subsidy and Housing Allowance are also not available as standalone or separate service offers, and have been designed to be an integrated part of the Home Stretch WA program that includes one to one support and access to brokerage funding.

Eligible living arrangements – Staying On Subsidy

The following living arrangements are eligible to be supported through a Staying On Subsidy:

- A foster or family care living arrangement approved by the Department of Communities that a young person was residing in prior to turning 18.
- A foster care living arrangement with a funded community sector organisation that a young person was residing in prior to turning 18.
- A previous foster or family care living arrangement³ that a young person lived in that did not end due to issues or concerns arising from the behaviour of the carer/s.

A foster or family care living arrangement where children in care still reside are eligible provided the young person meets the child protection placement requirements for all adult household members. A young person who is supported through a Staying On Subsidy in a home with children in care will be assisted to gain a Working with Children Check, as a requirement of all adults living in a foster home.

Eligible living arrangements – Housing Allowance

The Housing Allowance provides a more flexible option that supports young people to access a wider range of living arrangements including private rentals, boarding or lodging, student housing, shared housing, or living with relatives or friends.

The living arrangement must satisfy all below criteria for the young person to be eligible to be supported by a Housing Allowance:

² The Department of Communities is working to establish Home Stretch WA providers in all regions across WA through a staged roll out. In order to offer as many young people as possible some of the benefits of the Home Stretch WA program, an 'Interim Staying On Subsidy' has been developed to support eligible young people living in a region that does not have a commissioned Home Stretch WA provider. Young people will be expected to transfer to a Home Stretch WA provider within three months of the service commencing in their area.

³ The previous carer must still be an approved foster or family carer. If not, the young person would be eligible to access the Housing Allowance where a Living Arrangement Agreement can be developed between the young person and their previous carer/s.

- The living arrangement provides the young person with stable housing for a period of three months or more.
- The living arrangement meets standards of being safe, stable and affordable as agreed and defined by the Home Stretch WA provider and young person in a completed Housing Allowance Application Form.
- The payment recipient can provide an ABN or evidence to confirm their identity to the satisfaction of a Home Stretch WA provider.

Living arrangements ineligible for a Housing Allowance

There are some living arrangements that are ineligible due to policy positions held by the Department of Communities, or because they are inconsistent with the principles of the Home Stretch WA program. These include:

- Housing options identified as unsafe during the application process, based on the discretion of the Home Stretch WA provider.
- Housing that is already subsidised to make it affordable, including National Housing and Homelessness Agreement (NHHA) funded housing and homelessness services, social housing (including public housing), community housing funded by the Department of Communities, or Department of Communities funded specialist youth housing and homelessness programs.
- Living arrangements that require payment to family members or carers from whom a young person was either removed or protected from.

Government funded homelessness services, public and community housing, and NHHA funded services are already significantly subsidised by the State Government, with rent and fees calculated to be affordable proportionate to an individual's income.

Right to Appeal Decisions Regarding the Eligibility of Living Arrangements

Where a young person feels a decision has been unfair, biased, incorrect, or based on inaccurate information, the young person has the right to appeal the decision directly with their Home Stretch WA provider.

The process for appealing a decision with a Home Stretch WA provider is governed by each Home Stretch WA provider's internal complaints and appeals policy.

Where a young person feels the response given by their Home Stretch WA provider has been unsatisfactory, or if they feel uncomfortable about making a complaint or appeal directly to their Home Stretch WA provider, young people are able to contact the Advocate for Children in Care employed by the Department of Communities. The Department of Communities *Complaints Management Policy* outlines how complaints and appeals are managed and supported by the role of the Advocate for Children in Care. The Advocate

will respond to each complaint or appeal on a case by case basis and may make recommendations to the Home Stretch WA provider and young person about how to resolve the complaint or appeal.

The Home Stretch WA Community of Practice has developed the “*Home Stretch WA - Complaints and Appeals Guide*” to assist Home Stretch WA providers to understand their responsibilities in effectively responding to a complaint or appeal.

6 Approval of applications

The processes for approval of Housing Allowance and Staying On Subsidy applications have been designed to carefully balance the practice needs of an effective and accessible service offer with the fiscal governance requirements of controlling risk related to financial payments.

Role of Home Stretch Providers – Develop and Endorse

Home Stretch WA providers are responsible for supporting young people to apply for a Housing Allowance or Staying On Subsidy in line with the most current practice guidelines published by the Home Stretch WA Community of Practice, and with alignment to the conditions set out in the Financial Governance Policy. The Housing Allowance and Staying On Agreement practice approaches have been developed to support a highly individualised approach that respects and promotes the agency of a young person and their right to make choices about their living arrangements.

The delegation of authority to endorse applications to each of the Home Stretch WA providers means each service holds responsibility for ensuring any proposed living arrangement is assessed as safe, stable and affordable based on the individual capacity of the young person, and the unique of the living arrangement.

Staying On

Applications for the Staying On Subsidy are generally completed by a Staying On Facilitator and a Transition Coach as part of their work in supporting the negotiation of a Staying On Agreement with the carer/s and young person. The Staying On Agreement details the conditions and expectations of the living arrangement.

Only approved foster and family carers are eligible to receive the Staying On Subsidy and the endorsement of a Staying On living arrangement as safe and stable is determined through the development of a Staying On Agreement.

Housing Allowance

Applications for a Housing Allowance are undertaken through a structured process that requires a young person to develop a proposal for a living arrangement with their Home Stretch WA provider. Each living arrangement is explored and planned for by the young

person and their Transition Coach so it is safe, stable and affordable. The eligibility of the living arrangement and the payment recipient are also established through the application process.

The Housing Allowance Application is submitted to the Home Stretch WA provider's program coordinator (or delegate) for independent review and endorsement. Each application must be reviewed from an independent perspective.

Endorsed applications must be submitted directly to the Home Stretch Services Team who will complete a final audit to ensure it is completed in full and is endorsed by the Home Stretch WA provider.

Role of Department of Communities – Approve and Authorise Payment

The Department of Communities Statewide Services holds responsibility for auditing and approving submitted applications for both Staying On and Housing Allowance payments.

Approval for payment is subject to the individual application meeting the following conditions:

- The application is completed in full and signed by all parties, and appropriately endorsed by the relevant Home Stretch WA provider.
- Living arrangements and Payment Recipients meet the eligibility criteria described in this policy.
- Evidence and details of the living arrangement are attached to the application.

Approved applications are then submitted to the Subsidies Processing Unit to initiate payments.

The Home Stretch Services Team have developed checklists, process maps and guidelines to support the auditing and approval of payments.

7 Payment terms and conditions

A completed and signed Housing Allowance or Staying On Application constitutes a contract between the Department of Communities and the payment recipient, detailing the relevant terms and conditions for commencing, maintaining or terminating payments.

Any request to change the terms and conditions of payments must be completed in writing, with the Home Stretch WA provider supporting relevant parties to complete an updated Housing Allowance or Staying On application form, and include a rationale for the change.

The maximum term for any payment is 12 months, and payments cannot be authorised to commence before a young person turns 18, or continue after a young person reaches the age of 21.

Commencement of Payments

Payment of the Housing Allowance and Staying On Subsidy is authorised for commencement from the date the completed application was approved by the Department of Communities Home Stretch Services Team.

The Department of Communities has the discretion to back date the subsidy commencement for up to ten (10) working days. This will be considered on a case by case basis.

Conditions to maintain payments

Housing Allowance and Staying On Subsidy payments are set at fixed rates and approved for fixed periods of time. While the fixed period provides a commitment to the ongoing investment in the living arrangement, payments are conditional upon the young person, payment recipient and Home Stretch WA provider meeting their respective responsibilities as described below.

There is a requirement that young people are actively engaged and supported by their Home Stretch WA provider in order to continue to receive a payment towards their living arrangement.

Conditions for the young person

The responsibilities of the young person are described in the resource *Staying On/Housing Allowance Fact Sheet for Young People*. The young person must commit to these responsibilities as part of completing their application for a Staying On Subsidy or Housing Allowance.

To maintain the ongoing payment of a Housing Allowance or Staying On Subsidy, a young person must:

- maintain the living arrangement as their primary place of residence,
- maintain regular engagement with their Transition Coach, meeting face to face or by phone at least every six weeks,
- participate in informal and formal reviews of the living arrangement on a quarterly basis or as required; and

provide evidence of meeting their obligations of the living arrangement and/or provide consent for their Home Stretch WA provider to check in with their carer or the payment recipient.

Conditions for the Staying On carer/s

Every Staying On Agreement sets out the expectations of the living arrangement and requires that the Staying On carer/s maintain their obligations in relation to the living arrangement. As a minimum this requires:

- ongoing provision of a safe and stable living arrangement for a young person as their primary place of residence as agreed in the Staying On Agreement; and
- participating in informal and formal reviews of the living arrangement on a quarterly basis, or as required.

Conditions for a Housing Allowance payment recipient

A Housing Allowance payment recipient will have their responsibilities described and defined by either the Lease Agreement, Boarding or Lodging Agreement, or as agreed in a Home Stretch WA Living Arrangement Agreement.

In addition to the responsibilities set out in the agreement, Housing Allowance payment recipients must also respond to requests for informal and formal reviews of the living arrangement on a quarterly basis, or as required.

8 Controls to reduce risk of overpayment or fraud

A range of controls have been embedded into this policy and are described in the supporting guidelines and procedures to ensure applications and approvals are completed in a consistent, equitable and transparent way, and there is sufficient monitoring and review of living arrangements and payments to reduce the risk of accidental overpayment or fraudulent applications.


These controls combine the learnings and evidence base derived from the Home Stretch WA Trial, with the independent recommendations provided by PricewaterhouseCoopers in their 2022 review and audit of the Home Stretch WA payment mechanisms and processes.

Staying On

The following controls are in place to manage and reduce risks associated with the payment of the Staying On Subsidy:

- Payments can only be made to individuals who have been through the approval process to become foster carers. The foster carer approval process includes a range of identity checks and safety assessments that would exceed the requirements related to supporting young adults to live with other adults.
- Every Staying On living arrangement must have a negotiated Staying On Agreement that empowers all parties to understand and communicate their needs and expectations around living arrangements.
- Staying On carers and young people must complete and sign a Staying On Subsidy Application form that details their obligations and consequences of not

meeting them. This includes a clause stipulating an agreed responsibility to repay any overpayment of subsidy.

- Staying On Subsidy Applications and Agreements must be endorsed by at least two different staff from a Home Stretch WA provider.
- Staying On Subsidy Applications and Agreements are audited and approved by the Department of Communities Statewide Services 
- Every young person is offered regular support and maintains contact with their Transition Coach.
- Every Staying On carer is offered regular support through a Staying On Facilitator.
- Every Staying On Agreement is subject to regular informal check in meetings and reviews, and a formal review of the living arrangement.
- On a quarterly basis, the Department of Communities will provide each Home Stretch WA provider with a list of Staying On Agreements that are currently being funded. Home Stretch WA providers are required to confirm in writing that each living arrangement is still safe and stable and remains the young person's primary place of residence.

Housing Allowance

Housing Allowance payments are made to a broader range of recipients and therefore there are a number of additional requirements and controls:

- The Housing Allowance application process requires significant planning and preparation on the part of the young person, including the development of a budget, housing pathway plan and safety checklists.
- The Safe and Stable Living Arrangement component of the application form provides an auditable measure of risk in each proposed living arrangement, and an opportunity for risks to be explored and managed.
- Every Housing Allowance Application is reviewed by the Home Stretch WA provider's program coordinator, or their delegate. This provides independent oversight and audit of the details of each application before it is submitted. The review and endorsement must be completed by a person familiar with both Housing Allowance practice and policy, but not directly involved in supporting the young person.
- Every Housing Allowance Application is subject to final review and approval by the Department of Communities Home Stretch WA Services Team, providing a third level of oversight over the details of the application against the eligibility criteria.

- Evidence of a young person's tenure must be provided as part of each application. Acceptable forms of housing tenure are limited to one of the following: a signed Lease Agreement (where the young person is nominated on the lease); a Boarding or Lodging Agreement; a Student Housing Contract; or a completed Home Stretch WA Living Arrangement Agreement.
- The payment recipient (landlord) must complete and sign their section of the Housing Allowance Application Form that details their obligations and consequences of not meeting them. This includes a clause stipulating an agreed responsibility to repay any overpayment of Housing Allowance.
- The payment recipient must provide some form of identification to prove their identity. This can either be through providing an ABN as part of the application, or through having a primary or secondary identification document sighted by the Home Stretch WA provider.
- Payment recipients unable to provide an ABN must complete a *Statement by Supplier Form* as part of the application form.
- Housing Allowance Applications must be endorsed by at least two representatives from a Home Stretch WA provider, with final endorsement required by the program coordinator (or their delegate) who is not directly involved in supporting the young person.
- Housing Allowance Applications are audited and approved by the Department of Communities Home Stretch WA Services Team.
- Every young person is supported and must meet regularly with their Transition Coach to maintain the payment.
- Every Housing Allowance living arrangement is subject to regular informal check in meetings and reviews, and a quarterly formal review of the arrangement. These check in meetings incorporate verification with the payment recipient (landlord) that the young person is meeting their obligations, as well as site visits to the living arrangement by the Transition Coach.
- A formal review can be initiated by any party, including the Department of Communities, where there are concerns around the living arrangement. Failure to agree to a formal review will lead to the suspension of the Housing Allowance payments unless there are extenuating circumstances.
- On a quarterly basis, Home Stretch WA providers are sent a list of their current Housing Allowance living arrangements by the Home Stretch WA Services Team, and are required to confirm in writing that each living arrangement is still safe and stable, and the young person remains living there as their primary place of residence.

9 Termination of payments

Each Home Stretch WA provider has the responsibility to monitor all funded living arrangements they have established, and to ensure they continue to be maintained in line with the expectations described and defined during the application process. It is the responsibility of the Home Stretch WA provider to respond promptly to any deviation or breach of the agreement, or if the conditions for maintaining a payment are no longer being met.

Where a Home Stretch WA provider becomes aware of a breach of the conditions of maintaining a Home Stretch WA payment (Staying On Subsidy or Housing Allowance), the following must be followed:

- Formal notification to be made to the Home Stretch WA Services Team of the details of the breach and whether any suspected overpayment has been made. The Home Stretch WA Services Team will then liaise with the Subsidies Processing Unit in responding to the suspected breach.
- Contact all parties to initiate a formal review meeting of the living arrangement, advising them the payments may be suspended. The purpose of the formal review is to ensure the rights and responsibilities of each party are being met, and provide an opportunity for all parties to resolve any issues or challenges that are identified, or formally end the Staying On/Living Arrangement Agreement.
- The outcome of the formal review is to be communicated to the Home Stretch Services Team.

Where the formal review meeting and planned response fails to restore the living arrangement to the conditions needed to maintain a Housing Allowance or Staying On Subsidy payment, the Home Stretch WA provider must notify all parties of their responsibility to advise the Department of Communities (via the Home Stretch Services Team) of the need to terminate the payments and potentially seek recovery of any overpayment (where relevant).

In some circumstances an overpayment may be discovered by a payment recipient before it is identified by the Home Stretch WA provider or Department of Communities. In these instances, where a payment recipient contacts the Department of Communities directly, an e-mail will be sent to the Home Stretch WA provider informing them of the notification and termination of the payments.

10 Resources

Home Stretch WA providers should refer to the *Home Stretch WA Guidelines for Staying On Subsidy and Housing Allowance*.

Further information about the program is available on the WA Government Home Stretch WA webpage - www.communities.wa.gov.au/homestretchwa including a Staying On guide for young people and carers and Frequently Asked Questions.

Practice guidelines and other resources used by Home Stretch WA providers are maintained on the Community of Practice website at www.homestretchwa.org.au, and duplicated on the Department of Communities Home Stretch WA SharePoint Site.

11 Related policies and case practice guidance

- Casework Practice Manual Chapter 3.4.13 Leaving the CEO's care and transitioning to adulthood
- Casework Practice Manual 4.1.2 Complaints management
- Care Team Approach Practice Framework
- Care Planning Policy
- Leaving Care Policy

12 Document control

Publication date	August 2023
Review date	August 2024
Owner	Executive Director, State-wide Services
Custodian	Director, Service Delivery Implementation

13 Amendments

Version	Date	Author	Description
1	March 2022	Senior Policy Officer	New policy - first draft
2	June 2022	Senior Policy Officer	Update to policy in line with relevant recommendations in PricewaterhouseCoopers (PwC) Home Stretch WA Staying on Subsidy and Housing Allowance Review Report and attached process maps developed by PwC
3	December 2022	Senior Policy Officer	Update to policy regarding eligibility of young people who are or were subject to a protection order (special guardianship)
4	January 2023	Principal Project Officer	Complete review undertaken. Added additional definitions – Policy statement amended to Background with additional information; and Responsibilities (section 5) deleted. Added following sections: <ul style="list-style-type: none"> • Eligibility • Approval of applications • Mechanisms and controls to reduce risk of overpayment or fraud • Termination of payments

Version	Date	Author	Description
5	May 2023	Principal Project Officer	Policy reviewed by Implementation Working Groups under the Home Stretch Community of Practice: Addition of section – Payment Terms and Conditions Amendments made to – <ul style="list-style-type: none"> • Housing Allowance Payment Recipient Criteria • Payment Approval • Right to Appeal • Mechanisms for Controlling Risk of Overpayment
6	June 2023	Senior Policy Officer	Completed final review and collation after feedback from Guiding Panel
7	July 2023	Senior Policy Officer	Amendments made to – <ul style="list-style-type: none"> • Commencement of Payments
8	July 2023	Home Stretch WA Steering Committee	Final review, feedback and endorsement.
9.	August 2023	Principal Project Officer	Final policy.
10	15.9.2023	Executive Director Ben Whitehouse	Approved Final version