'What's Important to YOUth?'

A response to the Victorian Government's discussion paper to inform a new youth policy

November 2015

About YACVic

The Youth Affairs Council of Victoria Inc. (YACVic) is the peak body and leading policy advocate on young people's issues in Victoria. Our vision is for a Victorian community that values and provides opportunity, participation, justice and equity for all young people. We are an independent, not-for-profit organisation.

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About us

The Youth Affairs Council of Victoria (YACVic) is the state peak body for young people aged 12-25 and the services that support them. We are a vibrant, member based organisation, with 267 members – approximately half of them young people, the others comprising local governments, community and health services and research bodies, all committed to improving wellbeing, participation and equality for young people. We welcome this opportunity to contribute to the development of a new Victorian youth policy. We also refer the reader to our responses to the previous three Victorian youth policies (2012, 2006, 2002).[1]

In this paper, YACVic responds to the draft vision and draft objectives put forward in the discussion paper 'What's Important to YOUth?', and addresses the discussion paper's consultation questions.

We have also addressed several policy issues which were not mentioned in the consultation questions, but which align with the priorities of the Victorian government and YACVic's members.

In addition, we have considered how a new youth policy could operate most effectively, and the potential roles of government, the youth services sector and young people in this.

YACVic thanks our policy advisory group and the 26 people who took part in our consultation session, as well as the Youth Disability Advocacy Service (YDAS), the Koorie Youth Council (KYC), the Victorian Student Representative Council (VicSRC), the Centre for Excellence in Child and Family Welfare, Smart Justice for Young People, and the Victorian Council of Social Service (VCOSS) for their input into this response.

A new direction

YACVic applauds the Victorian Government's commitment to a new youth policy, early in the first term of a new government. We have long maintained that young people, as a cohort, must be visible within policy-making and program development across

government, their concerns and priorities championed by a well-supported Office for Youth. Without a strategic, whole-of-government youth policy, it is all too easy for young people's needs, experiences and voices to be overlooked or absorbed into the related but fundamentally different spaces of education, family services or early childhood.

There are a number of aspects of the forthcoming youth policy which are already very positive. YACVic especially welcomes the Victorian Government's commitment to engaging with diverse groups of young people to inform the development of the policy, and the discussion paper's emphasis on addressing issues of inequality and disadvantage. Also very welcome is the commitment to a supported whole-of-government approach, with mechanisms for monitoring and evaluating the policy's impact.

Context

YACVic suggests the new youth policy would be strengthened if it were placed in a stronger context. At present, the section 'Why a new youth policy?' lists several key issues of importance to young people, which is helpful. However, this is framed in terms of a contrast between 'most young people' who are 'doing well', and the comparatively small numbers experiencing critical disadvantage in areas like homelessness and imprisonment. Here, there is a risk of losing critical detail and context.

We suggest that this section would be stronger if it provided more background on the size and changing demographics of Victoria's young population, and the 'big picture' issues affecting young people as a cohort. These include:

- The rising costs of education, and rising levels of qualification expected of young people. For example, between 2003-2013 young Australians' rates of participation in full-time education rose by over 5%. According to the Foundation for Young Australians (FYA), a young Australian university student in 2014 graduated with an average $24,000 more debt than a student of their parents' generation.[2] Meanwhile, unemployment rates amongst early school leavers are high, and it's predicted that 70% of new jobs created by 2017 will require at least a Cert III qualification, with over half requiring a diploma-level qualification or higher.[3]

- The decline of full-time job opportunities and entry level jobs, and the rise of part-time, casual and short-term employment. FYA, for example, have identified huge market forces affecting young people, including massive job losses in the manufacturing sector, rising demands for workers in the health and community sectors, new opportunities for young entrepreneurs, and threats to Australian jobs from automation and globalisation.[4]
- High costs of home ownership and private rental housing. For example, the Australian Housing and Urban Research Institute found that the rate of home purchase amongst 25-34 year olds shrank between 1981 and 2011 from 61% to 48%, with single-income and lower-income households hit the hardest.[5] Meanwhile, in June 2015 the median rent for a one-bedroom apartment in Melbourne was $341 a week.[6]
- High numbers of young people reporting mental health concerns. The discussion paper cites mental illness as a concern, but does not reflect its prevalence. In their 2014 Youth Survey, Mission Australia found that one in five young Australians aged 15-17 showed a level of psychological distress indicative of a probable serious mental illness.[7]

Other 'big picture' issues affecting young people include:

- The proliferation of VET providers and the challenges of ensuring quality provision which matches job opportunities.
- The demands on public and private infrastructure for communities with large and growing young populations – notably outer suburbs and regional centres.
- The loss of young people from other some communities, especially rural towns.
- The levels of unmet demand reported by many youth support services.

Such a context would enable the Victorian Government to demonstrate why young people, as a cohort, should be visible in policy-making and program design, and to make a strong case in favour of a whole-of-government youth policy.

A wider context also helps explain why some young people end up especially disadvantaged – for example, why early school leavers struggle to find work.

Who is the policy for?

In YACVic's consultations with our members, a question raised frequently was 'Who is this document for?' We suggest a strong youth policy must recognise its readership and stakeholders explicitly, perhaps including specific sections aimed at different groups of readers, articulating the role they can play in the development of the policy and what the government's relationship to them will be.

The youth policy will be of strong interest to several different groups, notably young people themselves, parents and families, youth services, youth work students, the wider community sector, schools, and other government departments besides DHHS.

These different audiences are likely to expect different things. Young people, for example, may find some of the discussion paper's language and structure rather alienating, and may want much more information about what opportunities they will have to engage with government and take part in the life of the youth policy. (See further comments under 'Draft vision' and 'Working with young people').

Meanwhile, youth services are likely to expect a much stronger articulation of their own role in supporting young people, which is barely discussed in the document at present. Services are also eager for more information about what parts they can play in the design, implementation and evaluation of a youth policy. (See further comments under 'Draft objectives', 'What is the role of the youth services sector?' and 'Working with the youth services sector'.)

What is the role of the Victorian Government and the Office for Youth?

At present, the roles and responsibilities of the Victorian Government in relation to young people are not articulated in the discussion paper's draft vision or objectives, which we suggest needs amendment. (See 'Draft vision' and 'Draft objectives'.)

However, the discussion paper notes that the youth policy is being developed in the context of wider Victorian Government reforms in areas including education, VET, and mental health. (pp.7, 10) The paper recognises that 'the policy levers to improve

outcomes for young people are spread across different government departments', and that tackling key issues for young people will require investment across the whole of government. It promises that the youth policy will link to 'a governance mechanism across government to oversee actions and outcomes for young people'. The youth policy will identify actions to improve outcomes for young people, guide the government's engagement with young people, guide policy and program development in areas relevant to young people, and measure cross-government outcomes for young people. (p.16) These undertakings are very welcome.

It is crucial that the youth policy articulates what the above-mentioned government mechanisms will look like, what resourcing will be in place to support them, and how ministers, senior departmental staff and decision-makers across government will be engaged. Obvious stakeholders might include, for example, the Vulnerable Children Reform Unit and the Children's Services Coordination Board, as well as the mechanisms developed through Children and Youth Area Partnerships to support coordinated policy development and service planning at regional and local levels.

It is especially important to articulate the place of the Victorian Government's Office for Youth. In recent years, the capacity of the Office for Youth was reduced, with a concerning separation of policy development from program delivery. At the same time, the Office for Youth's ability to engage with the youth services sector was also reduced, notably by the cessation of the Regional Youth Affairs Networks (RYANs). This has led to uncertainty in the youth services sector about the Office for Youth's role.

A new youth policy presents an important opportunity to articulate the purpose, reach, capacity and responsibilities of the Office for Youth under the new government.

(For further discussion, see 'Draft objectives', 'Focus areas', 'Working with young people' and 'Working with the youth sector'.)

What is the role of the youth services sector?

Youth services provide a wide variety of vital supports for young people, ranging from generalist youth services (focused on community and civic engagement, skills

development, youth leadership, and / or support for young people and families to navigate the service system) to specialist youth services in areas including homelessness, justice, alcohol and other drugs, employment and mental health.

Young people also depend on other sectors, especially health services, schools and other education and training providers, as well as family services and (in the case of older young people) specialist adult support services.

A new youth policy must articulate the roles played by these services, their importance to the lives of young people, their expertise, the challenges they face, and their relationships to government. The role of the youth services sector in relation to a new youth policy must also be addressed. (See 'Working with the youth services sector'.)

At present, the discussion paper does not address these issues.

Draft vision

'To maximise the opportunities and remove the barriers for all young people aged 12 to 24 to realise their potential, including those who are disadvantaged, disengaged or face particular challenges.'

YACVic welcomes the Victorian Government's recognition of the importance of overcoming disadvantage and removing barriers for all young people. We suggest the vision would be enhanced if it included some reference to the following:

- Valuing young people's participation in their communities
- Recognising and building young people's strengths
- Ensuring all young people can enjoy a high standard of wellbeing
- Upholding the rights of all young people.

The vision would also be stronger if young people's opportunities were not only 'maximised' (which might imply simply making the most of existing arrangements), but resourced, provided and ensured. It is also important to ensure that young people

have the *right* opportunities, responsive to their interests and circumstances – otherwise governments and services will fail to engage them meaningfully.

YACVic members who took part in our consultation had different views about the vision 'including those who are disadvantaged, disengaged or face particular challenges'. While the commitment to addressing disadvantage was applauded, there were concerns that the language might be read as stigmatising, or as including some young people only as an afterthought. We suggest the message might be better expressed with wording along the lines of '…and working especially to overcome the disadvantages experienced by many different young people.'

More broadly, it is important to clarify the relationship of young people themselves to this vision. At present, the language reads as quite bureaucratic, which might be acceptable in a summary of the government's own roles and responsibilities, but may prove off-putting for young readers. Options for alternative or additional wording might be developed through further consultation with the youth reference group convened by the Office for Youth to inform this policy, or perhaps through 'crowd-sourcing' key ideas and language from the young people who responded to the government's online survey.

We would also query the restriction of the 'youth' age range to 12-24. This is inconsistent with the age range of 12-25 cited in the Office for Youth's public materials and their grants rounds such as 'Engage' and 'FReeZA'.[8] YACVic would not support reducing the numbers of young people who can access engagement opportunities and support services.

Draft objectives

YACVic welcomes the discussion paper's prioritisation of prevention, early intervention, youth engagement, education, employment, combatting social inequality, and ensuring young people feel safe and connected to their families, communities and civic society.

However, the objectives (p.15) seem very broad. We suggest they might be expressed as guiding principles, with an additional layer of objectives introduced in line with the S.M.A.R.T. criteria – specific, measurable, assignable, realistic and time-related.

YACVic also believes the objectives should articulate the roles and responsibilities of the Victorian Government in relation to young people, and the importance of a youth services sector which is adequately resourced, well connected and required to work effectively and respectfully with young people.

Furthermore, the objectives would be stronger if they were articulated within a human rights framework, rather than the vague language of a 'fair go' (which might give an incorrect impression that equal opportunities already exist).

Such an approach would align with Australia's status as a signatory to the Universal Declaration of Human Rights and the Convention on the Rights of the Child, as well as Victoria's Charter of Human Rights and Responsibilities. These documents encompass (amongst other things) the right of every young person to:

- A standard of living adequate to one's health and wellbeing
- Education – including equitable access to higher education and VET
- Enjoyment and expression of culture, religion and language, including for members of Indigenous and minority communities
- Participation in the government and public life of one's country, and access to the public service and public office
- A meaningful voice for children in all matters affecting their lives
- Protection of family life
- Freedom from discrimination
- Protection of children from sexual abuse and all forms of exploitation prejudicial to their welfare
- Freedom of expression, association and assembly
- Freedom from torture and all forms of cruel, inhuman or degrading treatment or punishment.

In addition, YACVic suggests the following amendments to the objectives:

- Young people should not only be 'heard and engaged by government in matters that affect them'; they should also be supported to participate in decision-making about all matters which affect their communities.

- Education, training and employment should not only 'secure [young people's] economic future'; they should also promote personal development and community cohesion.

- Young people themselves cannot always 'prevent and address problems early'. Prevention, in particular, requires a strong universal platform across areas like education and community design. Clearer wording might be 'Families, communities, schools, governments and services work with young people to prevent and address problems early'.

- As well as feeling safe and connected, young people should also feel proud and valued within their communities.

- Common sites of disadvantage and discrimination include income, family life, and sex (young women experience particular inequalities). These should be named alongside 'cultural background, gender identity, sexual orientation, intersex status, disability, health, religion, mental health status, or whether they live in a rural or regional location'.

- We also suggest replacing 'no matter their cultural background [etc]' with more positive wording like 'whatever their cultural background [etc]' or 'young people of all cultural backgrounds [etc]'.

Focus areas, actions, monitoring and evaluation

We welcome the discussion paper's undertaking that the youth policy will be accompanied by 'a cross-government implementation plan, identifying responsibilities, funding arrangements, key milestones and reporting requirements', as well as outcomes, performance indicators, and an evaluation framework. (p.15)

Such steps will be crucial to delivering benefits to young people, and to demonstrating the success of the youth policy. It was a source of concern to the youth sector that (contrary to YACVic's advice)[9] the previous youth statement, *Engage, Involve, Create* (2012) was not accompanied by such an action strategy. This caused many of our members to reflect that they were unclear about the policy's purpose and value.

An implementation plan should map existing initiatives which were designed to meet the objectives raised in the youth policy, and articulate how these will be better integrated and coordinated in the future. Upcoming initiatives to improve service integration, such as the Roadmap for Reform, will also be relevant here.

The youth policy should also outline what (if any) new interventions will be supported.

A key related role of the youth policy should be to ensure that young people's concerns are prominent in all relevant areas of policy and programmatic reform in the future. At present, wider reforms often fail to adequately address the concerns of young people and the services that support them. For example, the recent 10 Year Mental Health Plan discussion paper did not address youth mental health, while the Royal Commission into Family Violence did not name young people as a priority group.

Furthermore, we suggest that the evaluation framework for the youth policy should be designed and released early for feedback from the youth sector and young people. It should then be revisited regularly over the life of the policy. Such a framework will have to negotiate challenges including gaps in reliable data about young people's health and wellbeing, and the need to measure outcomes for young people rather than simply the number of services or programs accessed. It is important to work closely with research institutes to foster strong outcome indicators and nuanced, qualitative understanding of how interventions are actually working for young people.

The importance of strong accountability measures, whole-of-government implementation, and meaningful engagement with the youth sector, were prominent points in YACVic's responses to earlier Victorian Government youth strategies, including *Future Directions* (2006) and *Respect* (2002).[10]

Working with young people

YACVic and our partner organisations have undertaken separate consultations with young people to inform this policy, with recommendations. As such, we will not comment in detail on youth participation in this document.

However, our members have reflected to us the importance of ensuring that the Victorian Government continues to engage with young people, facilitating their contributions and decision-making over the life of this youth policy.

A wide variety of young people should be involved, with different backgrounds, communities, identities and interests. Meaningful connections should be maintained with the young people who have already taken part in the consultations, so that they can continue to be involved in the evolution of the policy. New work may also be needed to engage young people who have not taken part in traditional consultations before. Here, it is important to utilise the expertise of youth services, and to ensure that any youth engagement mechanisms address issues that young people find relevant and interesting, support young people to make use of their own knowledge and expertise, and enable them to build skills and take part in meaningful activities with clear results, as well as meeting new people, socialising and having fun.

To ensure the youth policy is 'owned' by young people, it could be valuable to support young people to write their own contributions to the policy, articulate the roles and responsibilities of the different stakeholders in a way that is meaningful to young people, and communicate this to the wider community. Young people should also be engaged in the evaluation of the policy.

In addition, it would be valuable if there were ongoing opportunities for young people to meet directly with the Minister for Youth over the life of the youth policy to discuss its meaning, development and value.

Some of our members have also suggested making use of the opportunities offered by the grants rounds funded through the Office for Youth, such as Engage, to communicate with young people about the youth policy and facilitate their involvement.

There has been considerable online and in-person consultation of young people at this early planning stage; it is important this momentum is not lost.

Working with the youth services sector

It is important to articulate how the services which support young people, including generalist youth services, will be engaged in the development, implementation and evaluation of the new youth policy. Community-based services play a key role in delivering outcomes for young people across all the topic areas identified in the discussion paper. Youth services are also a rich source of data, qualitative information and strategic advice which would be highly valuable in shaping a youth policy.

Since the cessation of the Regional Youth Affairs Networks (RYANs), the youth services sector has had very few regular, supported opportunities to provide strategic advice to government, and to develop and share evidence-based policy positions and good practice with one another across the state. This problem was raised many times at the ten local government youth services forums hosted by YACVic in 2015. It was also raised repeatedly at the sector consultations we ran in 2014 to advise the previous Victorian Government on what form of sector engagement could replace the RYANs. (Unfortunately, the latter piece of work received little response from the previous government.)

At a local level, youth services in some parts of Victoria are working closely with other sectors and government departments via the Children and Youth Area Partnerships pilots. The evaluation of Area Partnerships which is currently underway will provide a good opportunity to consider the lessons of these pilots, which could inform the development of a youth policy. This evaluation might also identify shortcomings in youth service delivery which the youth policy could address.

However, the Area Partnerships model is operating in only a limited number of sites, and does not enable youth services across Victoria to give regular, strategic advice to centralised government or share expertise with each other. Additional mechanisms are needed.

We submit that existing community-based brokerage bodies and peak bodies could be well placed to facilitate strategic conversations between youth services and the Victorian Government, if they were supported to do so. Here, these community-based

bodies could utilise their extensive sector networks, their expertise in working with young people, and their long-standing, trusting relationships with all stakeholders.

New partnerships between the youth sector and government should be informed by the following principles, which were articulated by the youth sector during our above-mentioned consultations in 2014-15:

- Strong, shared agreements between government and youth sector stakeholders concerning key problems to be addressed, desired outcomes and KPIs, evaluation processes, and resources to be committed.
- Meaningful engagement with work already undertaken by youth sector brokerage bodies, notably the Local Learning and Employment Networks, the School Focused Youth Service, and local government youth development units.
- Alignment with local government youth strategies.
- Clear, effective, respectful communication between services and government.
- Accurate, accessible, shared data, and support to build relationships with research partners.
- Opportunities for the sector to plan strategic responses to new laws, policies and plans, share findings and solutions, identify policy concerns, and build relationships with ministers and senior departmental staff.
- Adequate funding for coordination and data-gathering.
- A diverse and targeted membership with decision-making powers.[11]

Articulating how priorities are identified

The discussion paper identifies a number of key issues and groups of young people facing challenges. (pp.10-13) However, a stronger case would be made for the new youth policy if the Victorian Government articulated more clearly how their priorities were arrived at – for example, the research and data sets that were used and the consultations that informed this work.

In our own consultations with youth services, we found that they generally concurred with the priority issues named in the discussion paper (while also adding several more of their own, as we will discuss). However, many questions were raised about the

processes that had informed the writing of the discussion paper. For example, there were several requests for more information about why international students were identified as a particularly vulnerable group, when some others vulnerable groups (for example, young parents) were not listed.

Consultation questions

Improving young people's opportunities across fields such as employment and education must involve addressing the exclusion and barriers affecting many young people. In this section, YACVic outlines approaches to reform put forward in our recent advocacy and that of our members and partner organisations.

All the issues raised in the consultation questions must be addressed as part of a strong universal service system, not the least because these issues are all interconnected. It would make little sense to debate, for example, whether mental health is more important than safe, appropriate housing, when they are, in fact, inseparable.

It is also vital to retain a focus on prevention and building young people's protective factors. We note, for example, the important advocacy of the Koorie Youth Council concerning the need to support and strengthen young people's connections to culture, land, community and family as vital components of mental health, wellbeing, educational engagement and self-esteem.

'What do you think should be done to improve educational opportunities for young people?'

YACVic welcomed the Victorian Government's recent $747 million investment in Victoria's education system, notably the increase in equity funding and the announcement of LOOKOUT Education Support Centres and the 'Navigator' pilot.[12] We also join the VicSRC in applauding the Government's commitment to empowering students and giving them a greater say in their own learning and school lives.

Other recommendations by YACVic to inform the 'Education State' (2015) included:

- Ensure all secondary students have adequate access to wellbeing services, counsellors, and Indigenous and disability support staff, with adequate connections to outside services, and improve the ratio of Student Support Services to students in areas of high need.

- Secure funding for the School Focused Youth Service beyond December 2015, to support partnerships between schools and services and build their capacity to support young people at risk of self harm, school disengagement and behaviours requiring intervention.

- Ensure the Special Needs Plan for Victorian Schools focuses on equity issues for students with disabilities in disadvantaged areas, and addresses all the recommendations of the Victorian Equal Opportunity and Human Rights Commission's *Held Back* report (2012).

- Develop and adequately resource a mandatory, consistent model of transition planning for children moving from primary to secondary school. Schools must be adequately supported to understand their obligations, including around appropriate disclosures of information.

- Support student transitions from primary to secondary school, including by:
  - Working with universities to increase knowledge of transition issues in pre-teacher training.
  - Increasing student engagement with extra-curricular activities.
  - Building the engagement of parents and carers with secondary schools.
  - Ensuring all students (especially those facing disadvantage) access a comprehensive orientation program.

- Support flexible re-engagement models in line with the best practice identified by the Dusseldorp Skills Forum and Associate Professor Kitty te Riele, including through the Framework of Quality Flexible Learning Programs. Enable flexible learning programs to work in meaningful collaboration with state secondary schools (whose obligation to support all students should not be overlooked), including providing supported pathways for students to return to mainstream schools if they wish.

- Review the impacts of 'Ministerial Order No. 625 – Procedures for Suspension and Expulsion'. YACVic is concerned at claims of increasing exclusion of vulnerable young people, including young people in out-of-home care and young people with

disabilities. More information is needed about numbers and rates of suspensions and expulsions over time, subsequent outcomes for students, how disciplinary processes operate in practice, and what changes might be needed to reduce forcible disengagement from school.

- Continue to resource the Out of School Hours Learning Support Programs (OSHLSP) sector, including the Centre for Multicultural Youth's MY Education program to support the design and delivery of OSHLSP throughout Victoria. Increase support to schools and organisations to deliver OSHLSP in areas of need.

- Implement the recommendations of the University of Melbourne longitudinal study *Deferring a University Offer in Victoria* (2014), to improve rural and regional young people's access to university.[13]

We also support KYC's call for a focus on improving educational support, engagement, retention and attainment for Aboriginal young people.

'What do you think should be done to improve training opportunities for young people?'

YACVic welcomes the Victorian Government's commitment to a high quality of vocational education and training (VET) in Victoria. Our recommendations to the VET Funding Review (2015) and the 'Education State' (2015) included:

- Ensure secondary schools are adequately funded to provide students with a range of high quality VET in Schools (VETiS) options, without passing costs onto families experiencing disadvantage.

- Support schools to align VETiS better with other school subjects, increase students' access to workplace training, and promote VETiS as a foundational pathway for higher VET qualifications and apprenticeships.

- Resource VET programs outside of schools which show success in improving educational, employment and wellbeing outcomes for young people facing disadvantage. Indicators of success might include: increased VET participation and completion by formerly disengaged young people; increased transitions into work or higher study; reduced rates of arrest / imprisonment; and improved

literacy and numeracy. Modules which allow students to undertake foundation-level studies alongside a certificate qualification may be especially useful.

- Ensure that young people attending TAFEs and other VET providers can access wrap-around supports in areas such as mental health and housing, to at least an equivalent level to their peers in mainstream schools.

- Enforce stronger regulation of Registered Training Organisations' marketing and recruitment practices and business models, to protect young people from being directed into courses which do not deliver employment outcomes.

- Consider relaxing the 'two course' rule, which limits students to two subsidised course commencements per year and two subsidised enrolments at the same level in their lifetime, in instances where there are clear benefits to a young person in completing an additional qualification at a reputable provider. (Young people are vulnerable under the 'two course' rule, due to inexperience and pressure from employers, job service providers and families to undertake training in areas which later turn out to be inappropriate.)

- Review the concession rate system for VET students, with the aim of ensuring that cost barriers are not stopping young people (especially early school leavers) from accessing training which would help them into meaningful work.

- Retain the system of 'zero-fee' training places currently available to young people under 22 who are living in out-of-home care, or transitioning out of care.

- Consider extending 'zero-fee' training places to young people who have been subject to orders within the Youth Justice or justice system, and to young people who are clients of homelessness services.[14]

We welcomed the Andrews Government's election promise to 'Restore VCAL to the status of a legitimate pathway'. More action is needed to ensure students can access a high quality of VCAL which builds their foundational skills, connects to post-school options for training and employment, and is valued by secondary schools themselves.

'What do you think should be done to increase employment opportunities for young people?'

We welcome the Victorian Government's recognition of youth unemployment as a priority area. While some young people are more likely to be excluded from gainful

employment than others, virtually all young people are 'vulnerable' in an unstable labour market with entry level jobs vanishing.

The discussion paper identifies long-term youth unemployment as a priority. We believe that a youth policy should also address the chronic *under*employment of young people, and the serious disengagement of some young people who are out of the labour market altogether (i.e., not even receiving income support). The Brotherhood of St Laurence estimates these 'invisible unemployed' may comprise up to 30,000 young Australians under 20.[15]

Jobactive providers can rarely provide expert support to young people. And while Transition to Work will increase young people's options, it runs the risk of focusing more on short-term jobs than careers or education re-engagement. Its capacity to work with isolated communities and highly marginalised young people is also unclear.[16] The Victorian Government can still play a strong role in supporting targeted initiatives for disadvantaged young people, especially those whose current service access is poor, and connecting young people with trusted careers counsellors, mentors, trainers and potential employers.

In our recent advocacy, YACVic has called for:

- Intensive, case-managed support for young people aged 17-24 who are disengaged from education and training, and who face a high risk of long-term unemployment due to factors like mental illness, homelessness, or AOD misuse. Any outcome payments should be flexible enough to recognise significant social and wellbeing outcomes as well as securing a job. Before June 2013, Victoria's Department of Business and Innovation funded several such programs, run through youth support services, which helped young adults develop job-ready skills, linked them to supports in areas like housing and health, and collaborated with businesses help them secure work placements and jobs.
- Restoring the Local Learning and Employment Networks (LLENs) to 2014 funding levels. These partnership brokerage bodies bring together schools, trainers, employers and communities to find local solutions to youth educational engagement and pathways to work. YACVic welcomed the Victorian Government's

2014 commitment of $32 million to continue the work of the LLENs for four years, but loss of federal funding has reduced their capacity.

- Initiatives to support secondary students who lack extensive social and employment 'networks' to develop career plans, build foundational and workplace skills, experience work placements, understand their rights at work, and build networks of mentors, potential employers and support services.[17]

YACVic also supports the recommendations of VCOSS in their 'Tackling Unemployment' report (2014). VCOSS advised that the Victorian Government pursue a workforce participation plan which promotes large-scale employment near where vulnerable people live, invests in social infrastructure which is likely to promote jobs growth, and supports social enterprises which create employment pathways. Such a plan should be aligned with strategies for extending affordable housing in job-rich locations and high quality public transport to connect vulnerable people with job opportunities.[18]

We also support YDAS's call for a disability employment plan with strategies to increase employment participation for young people with disabilities, including targets for their recruitment and retention in the Victorian public service.

'What do you think could be done to improve the mental health of young people?'

We welcome the discussion paper's recognition of young people's vulnerability to mental illness and limited access to support services.

YACVic's advice to the Victorian Government's 10 Year Mental Health Strategy (2015) focused on how schools and generalist youth services support young people's mental health, and the importance of building young people's protective factors, such as safe homes and schools and caring relationships with trusted adults.

Our recommendations included:

- Work with Mental Health First Aid Australia, the School Focused Youth Service and principals towards an eventual goal of making Teen Mental Health First Aid training available to all Victorian secondary students, and making Youth Mental

Health First Aid training available to staff and parents at all Victorian secondary schools.

- Extend the Secondary School Nursing Program to ensure all secondary students at government schools can access the program, and engage nurses fully in community mental health planning.

- Extend access for school wellbeing teams in underserviced areas to secondary consultation and external clinical supervision.

- Trial a 'youth workers in schools' model where youth workers from local services are funded to participate in multi-disciplinary student wellbeing teams.

- Put into place adequate coordination, training, resources and dedicated staff time to ensure that Victorian secondary schools implement existing reputable, evidence-based models of mental health planning, mental health literacy, parental engagement, and trauma-informed teaching practice.

- In partnership with local government, create more generalist youth support to provide age-appropriate early intervention for young people at risk of poor mental health.

- Increase the resources available to local government youth services (notably through the Engage grants) to enable young people to connect and contribute to their communities, and develop supportive networks and self-esteem.

- Resource youth mentoring programs which show success in strengthening young people's community engagement, self-esteem, and supportive networks. Prioritise long-term programs with potential for recurrent funding, guided by evaluation and quality improvement measures.

- Strengthen the capacity of Aboriginal Controlled Community Health organisations to work in the areas of youth mental health and youth suicide prevention, and commit to ensuring Aboriginal young people's access to culturally safe, timely, youth-specific mental health support.

- Develop culturally appropriate, community-led mental health promotion initiatives targeted at young people and their families in different multicultural communities.

- Rather than implementing a single 'youth triage' intake point (which YACVic does not support):
  - Resource networks of services and schools to develop and implement 'No Wrong Door' models of referral and service delivery.

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- Support youth workers and case managers to provide young people with holistic information about wellbeing and help them navigate the service system.

• Create more mental health Prevention and Recovery Centres for young people, to provide specialist residential support.

• Ensure that young people with mental illness who are not eligible for the NDIS retain access to community mental health services.

• Ensure any reforms to the youth mental health service system are guided by the lessons of the recent mental health and AOD recommissioning process (which proved highly problematic) – see the recommendations of VCOSS, the Victorian Alcohol and Drug Association (VAADA), VICSERV and Council to Homeless Persons (CHP).[19]

'What do you think should be done to tackle alcohol and drug issues for young people?'

In *Building the Scaffolding* (2013), YACVic and VCOSS found that 35% of the 213 services surveyed reported that demand for youth alcohol and drug services (AOD) in their local government area exceeded supply. The need for youth-specific supports was highlighted.[20]

The sector has also reflected to us that AOD policies should be research-driven, evidence-based, and tailored to address different behaviours, ranging from adolescent risk-taking to more serious self-medicating and substance dependence.

In particular, we note the findings of the 2014 Youth AOD Practice Summit, hosted by the Youth Support and Advocacy Service (YSAS), in partnership with YACVic, VAADA, and the Foundation for Alcohol Research and Education. Key messages from the 300 participants included the need for:

• Age-appropriate, youth-specific interventions (mixing vulnerable young people with older AOD clients can be very harmful)

• Much greater integration and coordination between youth AOD and other sectors, including education

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- Services with outreach capacity, flexible working hours, and links to housing and mental health support
- Diversion and early intervention
- Reduced waiting periods for youth-specific withdrawal and rehabilitation services
- Increased after-care capacity to support young people who have engaged with the adult system
- Responses tailored to young people in rural areas, Aboriginal young people, GLBTIQ young people, young people from refugee and migrant backgrounds, young people with mental illness, young people who have been in out-of-home care and/or the justice system, young people with disabilities, young parents, and children aged 10-12.

An accompanying survey of young AOD clients found that they wanted programs which were flexible and could meet multiple needs, including through outreach and service hubs. They all agreed that establishing trusting relationships with caring, non-judgemental workers was essential.[21]

YSAS has also called for specialised AOD supports for vulnerable young women, and stronger pathways for young people in AOD services into education and training.[22] YACVic supports such calls.

While young people would benefit from a more coherent, integrated AOD service system, in our response to the 10 Year Mental Health Strategy YACVic cautioned against adopting a single 'youth triage' intake and assessment point. Single intake points in the adult system have effectively reduced access for very vulnerable consumers, notably Aboriginal and Torres Strait Islander people and people experiencing homelessness. Young people are more likely to work well with services they know and trust, and which offer 'soft entry' or 'drop in' options and holistic support. Forcing them into unfamiliar services, making them navigate extra layers of 'gate keeping' and assessment, or denying them support unless they can meet very specific criteria, would result in many young people not accessing help. We also urge that any reforms to the youth AOD system be informed by the lessons of the radical recommissioning of adult AOD services under the previous government, a process which proved very problematic.

YACVic, Response to the Victorian Government's youth policy discussion paper, November 2015

More effective approaches to future reform have been proposed by VCOSS, VAADA, VICSERV and Council to Homeless Persons.[23]

'What do you think should be done to improve housing for young people?'

We welcome the discussion paper's recognition of youth homelessness as a critical area. In a 2013 survey of 213 Victorian youth service providers, YACVic and VCOSS found that crisis accommodation and transitional housing were by the far the most common areas of unmet need cited by the youth services sector.[24] Some of our members have called for a state youth homelessness strategy to address this, and YACVic supports their calls.

Young people are especially vulnerable to homelessness or unsafe, inappropriate housing if they have a disability, have experienced family violence, or have lived in out-of-home care. (Note: YACVic welcomed the Victorian Government's extended funding for the Springboard program, to help young people who are disengaged from education and employment to move from residential or lead tenant care into independent living. However, Springboard does not support all care leavers; wider change is needed.)

More must be done to address Victoria's shortage of affordable housing. For example, the median weekly rent for a one-bedroom apartment in Melbourne in mid-2015 - $341 – was more than the maximum Youth Allowance payment of $213.40 a week.[25] Meanwhile, in June 2015, there were 34,464 people on the waiting list for public housing in Victoria.[26]

In our recent advocacy to the Royal Commission into Family Violence and Victoria's 10 Year Mental Health Strategy, YACVic's recommendations included:

- Extend support to young people leaving out-of-home care until at least age 21, and provide a housing guarantee to assist young care leavers to secure and maintain private rentals, as recommended by the Centre for Excellence in Child and Family Welfare, VCOSS, the Council to Homeless Persons (CHP), Victorian Aboriginal Child Care Agency, Anglicare Victoria and Berry Street.

- Develop a disability housing strategy that ensures young people with disabilities can access housing in the community with appropriate individualised supports, rather than clustered or institutional housing. Housing should be accessible, affordable, and protected by tenancy rights. Tenancy should be separate from service provision, so that young people need not fear losing one service if they complain about the other. Young people must have real choice and control regarding who they live with and who provides their support.

- As recommended by VCOSS, Community Housing Federation of Victoria, CHP, Victorian Public Tenants Association, Tenants Union of Victoria, Domestic Violence Victoria and Justice Connect Homeless Law, establish an affordable housing strategy to expand the supply, security and quality of low-cost social and private housing in Victoria. New investment of $200 million per year would enable the growth of at least 800 homes each year.

- As recommended by CHP and VCOSS, establish a rapid rehousing program to quickly rehouse and support women and children escaping family violence. $10 million per year could assist over 1000 women and their children.

- Ensure that young people experiencing homelessness have adequate access to age-appropriate transitional housing and related supports.

We endorse VCOSS's recent advocacy in favour of a dedicated growth fund to expand social housing and a rapid rehousing program.[27]

'What do you think should be done to tackle discrimination of young people?'

YACVic welcomes the discussion paper's recognition of the harmful impacts of prejudice and discrimination.

To combat this, we suggest the youth policy focus on interventions which promote young people's belonging, self-esteem and connections to family, culture and community, and which encourage communities to challenge inequality and discrimination and enable all young people to play a meaningful role in decision-making and cultural life.

Recent recommendations by YACVic and our partner organisations have included:

- Strengthen requirements for health services to work competently and respectfully with young people of all sexualities and genders.
- Ensure that all Victorian secondary schools implement respectful relationships education which is evidence-based, supported by an expert coordination body, informed by the findings of the Respectful Relationships in Schools project (Our Watch), and implemented as a whole-of-school approach.
- Support the delivery of more traditional language programs and Aboriginal history and culture in the secondary school curriculum.
- Support the Principal Practice Leader (Education) through the Special Needs Plan for Victorian Schools to monitor and eliminate the use of seclusion and restraint against students with disabilities, and promote evidence-based alternatives within a human rights framework.
- Work with Safe Schools Coalition Victoria to extend their teacher training and resources into more independent and Catholic secondary schools.
- Work with universities to increase the competence of academic staff and pre-service teachers concerning issues affecting Aboriginal and multicultural young people, young people with disabilities, and young people who are same sex attracted or sex/gender diverse.
- Ensure schools, parents, youth and health services and police can access evidence-based training about the impacts of online pornography on young people's sexuality and relationships, its relationship to violence against women, and how best to engage with young people about issues of pleasure, consent, violence, and respect.
- Work with Victorian secondary students to promote a greater understanding of Victoria's responsibilities to international students and young people seeking asylum, to promote cohesion in school communities.
- Support research into mental health, discrimination and racism experienced by Aboriginal young people who are same-sex attracted and sex/gender diverse, with a particular focus on the experiences of bisexuality and trans/sister-girl/brother-boy/gender diverse people in the community. Help create safe spaces for discussion and development of resources and best-practice support models by and for these young people.

- Work with Aboriginal young people to advocate for more diverse representations and the elimination of terminology which reduces them to either 'leaders' or 'at-risk', in favour of language which is more inclusive and encompassing.
- Ensure schools are adequately supported to deliver evidence-based, evaluated strategies to eliminate bullying, including on grounds of disability.
- Resource peer-mentoring programs for young people with disabilities, focused on developing positive self-image, connections and pride. YDAS's expertise should be drawn upon here.[28]

'What do you think should be done to improve public transport for young people?'

Young people want to be meaningfully engaged in designing the future of our public transport system. They are concerned with many of the same issues as other travellers, such as safety and accurate, dependable timetables – indeed, these issues may be especially important to young people, as they are disproportionately likely to rely on public transport. At the same time, some young people struggle to access it, especially in rural, interface or regional areas.

In our 2013 response to the Melbourne Metropolitan Planning Strategy, YACVic found that young people in the outer suburbs, especially, saw public transport as a priority and a challenge. They wanted it to be safe, frequent and reliable, and to link up different suburban areas, fostering local 'hubs' for employment, education and culture, instead of just ferrying people to and from the CBD.[29]

YACVic has called for increased public transport to under-serviced areas of Victoria. This should include ensuring access to rural school buses for secondary-aged VET students, and utilising school bus networks more efficiently during 'down times'.[30] We would endorse recent recommendations by VCOSS concerning the need for regional communities to have a clearer, integrated ticket system, coordinated timetables, better public information, and orbital services to link different regional / rural locations.[31]

Meanwhile, many young people with disabilities find public transport infrastructure, vehicles and customer service inaccessible. In our 2014 Election Platform, YACVic called for governments to meet the milestones for the Disability Standards for Accessible

Public Transport 2002, under the Disability Discrimination Act 1992, which requires the public transport system to reach 90% compliance for most services and infrastructure by December 2017.[32] We would also endorse recent recommendations by VCOSS for particular action to ensure the accessibility of regional public transport vehicles, infrastructure and customer service staff.[33]

In our 2014 submission to the Inquiry into Social Inclusion and People with a Disability, YACVic and YDAS reiterated the concerns expressed by the Victorian Equal Opportunity and Human Rights Commission in their 2012 report *Held Back*, where more than a quarter of the students with disabilities surveyed reported transport as a barrier to their education. Further action is needed to increase students' access to specialist school buses, minimise travel time, and ensure all bus drivers and chaperones to specialist schools are properly trained in disability awareness and human rights.[34]

In addition, we are concerned by recent reports from our members that some young people are missing school due to lack of funds for public transport. Others are reportedly being excluded from using privatised bus services, and some have fines they cannot afford to pay. Many young people have little knowledge of their rights in relation to public transport and fines. YACVic would support a less punitive approach, especially for young people experiencing disadvantage, and would welcome the opportunity to work with other stakeholders to promote positive rapport and knowledge of public transport rights amongst young people, transport providers and the wider community.

'What else do you think could be done to improve the lives of young people in Victoria?'

YACVic identified several absences in the discussion paper, where we suggest further policy and program development is needed.

Poverty and structural inequality

Entrenched poverty and inequality are working to exclude some young people from meaningful employment, good health, adequate housing, education, and physical and cultural safety. While these concerns are implicit throughout the Victorian

Government's discussion paper, we submit it would be valuable to name them explicitly as core issues. For example, Jesuit Social Services' *Dropping off the Edge* (2015) found that 4% of Victorian postcodes accounted for over 28% of the highest rates of disadvantage in areas including unemployment, disability, low rates of educational attainment, criminal convictions, family violence, child abuse and neglect, and psychiatric admissions.[35]

These issues should be understood not merely in terms of a young person's 'vulnerability', but in terms of (in)justice and human rights.

Gaps in youth service delivery

The discussion paper acknowledges service gaps to young people leaving out-of-home care, and the fact that young people with mental health problems often do not access professional help early on. These are important issues, and we welcome their recognition. We also welcome the discussion paper's acknowledgement that universal services and programs must be responsive to the needs of young people. (pp.11, 13, 14)

However, we submit there should be more explicit recognition of the gaps in youth service delivery. In an extensive survey of the Victorian youth services sector undertaken with VCOSS in 2013, YACVic found that 71% of the 213 services surveyed reported that demand for services exceeded supply. The most commonly-identified service gaps were in relation to crisis accommodation, transitional housing and support, mental health and education. Other common areas of unmet need related to emergency relief and material support, employment and training, and AOD.[36]

In response, YACVic and VCOSS recommended that the Victorian Government, in partnership with local government, create more generalist youth support services across Victoria, as well as developing a workforce strategy to ensure that services work with young people in line with the Code of Ethical Practice for the youth sector.

More specifically, we also note and support KYC's calls for a clear articulation of the right of Aboriginal young people and their families to access support services which are culturally competent and culturally safe. To this end, there should be investment in

more Koorie youth worker roles and generalist supports available to all Aboriginal young people (not only those in immediate crisis), and a workforce development strategy to create a stronger Koorie child, youth and family support workforce.

Family violence

The Victorian Government has identified family violence as a priority area for action. YACVic suggests this should be articulated in the youth strategy.

At this early stage in their lives, young people can be very receptive to interventions to prevent and address violence. They are also especially vulnerable; they are more likely than the rest of the population to hold views supportive of gender-based violence, and more vulnerable to violence themselves. Perpetrators of abuse are especially likely to target young women, as well as young people of any sex who are isolated and disempowered. This can include young people with disabilities and young people in residential care. Meanwhile, family violence services rarely have much capacity to work specifically with young people; youth-specific responses are needed.[37]

YACVic's recommendations to the 2015 Royal Commission into Family Violence included:

- Ensure teachers and other staff at all Victorian secondary schools can access regular training concerning identifying, understanding and responding to disclosures of violence, including where a student has witnessed violence (rather than being directly targeted).
- Fund partnership brokerage between schools, community services and Victoria Police to plan coordinated responses to family violence and ensure students experiencing family violence are linked to appropriate specialist services.
- Build the capacity of education settings outside mainstream schools – including TAFEs, community VCAL and alternative education – to prevent and address family violence.
- Fund regular, state-wide training for the youth services sector in using the Common Risk Assessment Framework. This training should be tailored to the experience of working with a young person as the primary client, using the Code

of Ethical Practice for the Victorian Youth Sector. It should also address culturally appropriate approaches to supporting young people from Aboriginal, refugee and migrant backgrounds.

- Ensure all young people in out-of-home care can access therapeutic models of care to promote healing and recovery from trauma.
- Resource partnerships between multicultural and settlement services, youth services, and family violence services to develop, evaluate and extend initiatives which engage multicultural communities around family violence, build prevention and intervention, and support community advocates against violence, including young people.
- Invest in pathways to support families experiencing adolescent violence in the home. This should include engaging young people in well-evaluated behavioural and attitudinal change programs, connecting them to culturally-competent services to address trauma, mental illness and AOD, and providing expert support for family reunification where this is safe and desired by all participants.[38]

YACVic also supports calls by the Centre for Excellence in Child and Family Welfare to resource the development of a Victorian Aboriginal Children's Agreement between the Victorian Government and the Aboriginal community to improve the lives and safety of Aboriginal children and young people, consistent with the recommendations of *Koori Kids: Growing Strong in their Culture: Five Year Plan for Children in Out of Home Care*. This agreement should build on the approach of the Aboriginal Justice Agreement, and recognise the fundamental right of Aboriginal communities to participate in the development and delivery of programs and policies that affect their children and young people.[39]

Young people in the justice system

YACVic welcomes the discussion paper's recognition that young people's experiences in the adult justice system are a priority area (p.11). However we are concerned that the brevity of this section, and its focus on the point that young people are a low percentage of the prison population, does not capture the seriousness of the issue. Key points include:

- Young adult prisoners are a highly vulnerable group, likely to have experienced trauma and neglect, untreated mental illness, AOD use, homelessness, parents' or peers' involvement in the justice system, and disengagement from education.
- Recidivism rates of young adult prisoners are disproportionately high.
- While youth crime rates are dropping, the highest numbers of alleged offenders are still aged 20-24.
- Victoria's adult prison system has only one dedicated youth unit, which is well regarded, but which houses less than 5% of all young prisoners.
- There is no dedicated youth unit for young women in prison, despite their rapidly rising numbers. Between 2008-2013, the number of young women aged 17-24 who were imprisoned in Victoria increased by over 163%.
- Rehabilitative programs can have an especially positive impact on young prisoners – when such programs are available.

It is also important to consider young people involved in the *youth* justice system. This includes about half of young adult offenders aged 18-21, who can be sentenced to a youth justice facility through Victoria's 'dual track' system.[40]

While Victoria has several successful initiatives which are diverting adolescent young people away from crime, there are still some highly vulnerable young people and children aged under 18 who are coming into contact with the justice system repeatedly, and who need expert, targeted help. During 2014-15 the population group with the highest rate of re-offending in Victoria were boys aged 10-14, with nearly 37% of these offenders (581 boys) involved in more than one offence.[41]

We welcomed the Victorian Government's recent commitment of $1.2 million for the bail youth diversion program, which helps young people awaiting a court hearing live in the community and address their behaviour. However, further actions are needed.

YACVic supports calls by Youthlaw and Smart Justice for Young People for:

- Investment in state-wide youth diversion programs that are flexible, trauma-informed, culturally relevant and accessible to all young people.

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- Expansion of early intervention programs like the Youth Support Service.
- Adequate numbers of youth justice workers, to address the rising numbers of young people on community corrections orders.
- Facilitating the early exit from the infringements system for young people with special circumstances and without capacity to pay.
- Ensuring the Victorian infringements system for children (CAYPINS) avoids unnecessarily bringing children into contact with the criminal justice system.[42]

More broadly, we encourage a whole-of-government youth policy focused on prevention and early intervention approaches to reduce the factors of disadvantage and inequality which contribute to young people's involvement in the justice system. There should be a focus on groups of young people currently over-represented in the system, such as Aboriginal and Pacifica young people and young people coming from out-of-home care.

Inequalities of gender

In the discussion paper, the exact relationship between 'Issues' (pp.10-11), 'Groups facing challenges' (pp.12-13) and 'Consultation questions' (p.17) is not entirely clear. However, our members have expressed concern that none of these sections explicitly addresses violence, discrimination and inequality against young women.

In our submission to the Royal Commission into Family Violence (2015), YACVic noted that young women were more likely than the female population as a whole to report having been the victim of violence in the past 12 months, and more likely than young men to be assaulted by someone they knew, and/or to be assaulted in someone's home. We also noted disturbing recent research indicating that secondary school aged girls were more likely than boys to report having experienced unwanted sex, and more likely to attribute this to fear and pressure from partners.[43]

Meanwhile, Mission Australia's 2014 Youth Survey of 13,600 young Australians found that young women were considerably more likely than young men to report feeling 'extremely concerned' or 'very concerned' about issues including coping with stress, school or study problems, body image, depression, family conflict and bullying / emotional abuse. In addition, Mission Australia found that young men were more likely

than young women to believe that their aspirations in life – such as home ownership, career success and feeling part of a community – were achievable.[44] Mission Australia has also identified that young women appear almost twice as likely as young men to have a probable serious mental illness, with rates of female mental illness increasing.[45]

Such data, while complex and challenging to interpret, points towards particular forms of exclusion, abuse and pressure being placed on young women, and the importance of sensitivity to gender in policy formation and program development.

Children in the 'middle years'

YACVic suggests the youth policy should include an acknowledgement of the need for stronger policy development and programmatic support to improve outcomes for children in the 'middle years' (aged 8-12).

Support for children in the middle years should not be a main focus of a 'youth' policy. But nor is it a separate area. In our 2013 *Building the Scaffolding* study, YACVic and VCOSS found that the Victorian youth services sector was strongly affected by the need for middle years support. 59% of the services we surveyed reported that they provided some support to this age group, and 67% said there was an unmet need for services for 8-12 year olds in their local government area. Service gaps were identified in areas including recreation, mental health, education engagement, disability support, homelessness and AOD. In response, VCOSS and YACVic recommended that the Victorian Government develop a middle years policy framework, incorporating new program development and specific funding for services, and a partnership with research bodies and services from the early years, family and youth sectors to address workforce skills and development in relation to the middle years.[46]

The Middle Years Development Instrument, piloted in South Australia, Whittlesea and Frankston, provides an example of how to approach this work.

Geographical disadvantage

YACVic welcomes the discussion paper's recognition of the inequalities faced by young people growing up in rural and regional areas, as well as the benefits of rural life. The paper adds 'a small number of Victorian communities in regional Victoria experience a web of disadvantage and structural barriers that make it very difficult for residents to overcome economic and social disadvantage.' (p.13)

While this is valid, YACVic suggests two related issues should also be acknowledged:

- Structural inequalities affect most (if not all) rural communities. Their access to public transport, tertiary education and health and support services is limited, and educational disadvantage is common. Regional and rural Victoria is also home to higher than average proportions of people living on lower incomes. These issues are not limited to a small number of highly disadvantaged areas.[47]
- While a rural and regional focus is very welcome, there are also some metropolitan areas where young people are struggling with intergenerational poverty and poor access to services, infrastructure and education. In their 2015 *Dropping Off the Edge* report, Jesuit Social Services found that eight out of the thirteen Victorian postcodes with the highest levels of disadvantage were in Melbourne, mostly in outer suburbs.[48]

We suggest that a youth policy should make a clear commitment to ensuring access and equity for all young people wherever they live, and approaching all reforms with a sensitivity to geographical difference – as well as supporting targeted, place-based initiatives to overcome unique local disadvantage.

Support for young people in out-of-home care

We welcome the discussion paper's recognition of the high vulnerability of young people in out-of-home care, and the service gaps that exist for young people leaving care. YACVic urges that a youth policy should recognise the need for collaborative, wrap-around support for young people in care, across areas including housing, mental health, AOD and justice. The discussion paper recognises the role of schools in

'providing a positive future' for young people in care – but schools cannot do this alone, and unfortunately too many young people in care continue to be disengaged or excluded from school.[49]

'LGBTI young people'

YACVic welcomes the discussion paper's recognition of the inequalities faced by LGBTI young people and how their experiences vary according to factors such as culture and geographical location. We would encourage the youth policy to recognise that bullying, violence and discrimination are not only harmful to the health of these young people (as the discussion paper notes), but also damage their educational engagement and place them at risk of homelessness and social isolation.[50]

The language in this space is constantly evolving. However, we would suggest that the alternative term mentioned in the discussion paper, 'sexuality, sex and gender diversity', or 'same sex attracted and sex and gender diverse' (the preferred term of the HEY Project, which recently received new funding from the Victorian Government) may be more inclusive of young people's wide range of experiences and identities than 'LGBTI'.[51]

YACVic would welcome the opportunity to discuss any of these issues further. Please do not hesitate to contact our manager of policy and projects, Dr Jessie Mitchell, on policy@yacvic.org.au or 9267 3722.

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