



Brotherhood
of St Laurence

Working for an Australia free of poverty

Multicultural Framework Review

Submission to the Department of
Home Affairs

Brotherhood of St. Laurence

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About the Brotherhood of St. Laurence

The Brotherhood of St. Laurence (BSL) is a social justice organisation working to prevent and alleviate poverty across Australia. Our mission is to pursue lasting change, to create a more compassionate and just society where everyone can thrive. Our approach is informed directly by people experiencing disadvantage and uses evidence drawn from our research, together with insights from our programs and services, to develop practical solutions that work.

BSL supports people of asylum seeker, refugee and migrant backgrounds by delivering services in the areas of children and families, employment support and community capacity-building.

We welcome the opportunity to provide our insights, drawing on our long history walking alongside multicultural communities and people from culturally and linguistically diverse backgrounds. In this submission, we focus primarily on settlement policy because we know that people who are newly arrived face significant barriers and a wide range of challenges.

Alignment between this review and other Australian Government reforms and systems impacting the lives of Australia's multicultural communities is critical, including the Early Years Strategy, National Disability Insurance Scheme (NDIS), *Measuring What Matters*, *The Australian Government's White Paper on Jobs and Opportunities* and the Workforce Australia Inquiry.

Responses to the Terms of Reference

BSL offers insights and recommendations around four key themes:

1. Improving access to services and the social safety net for newly arrived migrants, refugees and asylum seekers.
2. Improving integration and coordination of supports through place-based delivery.
3. Removing barriers to labour market participation for newly arrived migrants.
4. Improving communication with people for whom English is not their first language.

The first three themes address the fourth item in the Terms of Reference: 'identifying areas for reform to address any systemic barriers that prevent people from multicultural communities from fully participating in Australian society, including those barriers that exist due to racism and discrimination'.

The final theme responds to 'how the federal government can more strategically communicate and engage multicultural Australia, including in languages other than English'.

1. Improving access to services and the social safety net for newly arrived migrants, refugees and asylum seekers

Australia is a signatory to the International Covenant on Economic, Social and Cultural Rights which establishes the rights of all people to social security, an adequate standard of living, and the highest attainable standard of physical and mental health. We are falling short in our obligations to uphold the rights of many multicultural members of our community by not addressing barriers

that reduce access to the supports, services and the safety net available to people born in Australia. This shortfall places many migrants in situations of extreme hardship and emotional strain.

Barrier 1: Restricted eligibility for services and social security payments

People who are not Australian citizens or permanent residents are ineligible for many social security payments and services, including Medicare, the Child Care Subsidy and NDIS. This means that people seeking asylum, on temporary visas or who are awaiting visa processing are deemed not eligible to receive a range of supports, which can lead to potentially unsafe situations or poverty traps. Many people face extended waiting periods to secure permanent residency arising from delays in processing applications, placing them in precarious situations.

In addition, the Australian Government introduced legislation in 2018 and 2021 that extended the Newly Arrived Resident's Waiting Period (NARWP), which restricts access to the safety net by limiting access to a range of social security payments for up to four years for people on particular visas, significantly elevating their risk of falling into poverty. Creating financial reliance on a partner's income without the option of a safety net may also exacerbate the potential for financial abuse, exploitation or unsafe situations for those experiencing family violence.¹

Barrier 2: Complexity in navigating confusing systems to access support

People from multicultural communities often struggle to navigate complex Australian systems. The eligibility criteria and application processes for vital services and resources such as myGov, Medicare, Immunisation History Statements, Child Care Subsidy, Early Start Kindergarten subsidies, identification documents and social security payments are often complex and confusing. This complexity is amplified for people who are not already familiar with Australian systems. The shift towards online services has, in some instances, exacerbated barriers to access.

Barrier 3: Language difficulties

Language is a common barrier to understanding which services people can access based on visa category and residence status. Many services use acronyms or terms that people (and most service providers) struggle to understand. It is even more challenging for recent arrived migrants who are unfamiliar with Australian public services or speak English as an additional language. BSL staff frequently find that translated resources are inaccurate and confusing, causing families to disengage.

Barrier 4: A lack of cultural safety or culturally responsive services

In BSL's experience working with multicultural communities, we often hear how a lack of cultural safety has deterred a family from accessing mainstream services.²

¹ BSL 2021, *Submission to the Senate Community Affairs Legislation Committee inquiry into the Social Services Legislation Amendment (Consistent Waiting Periods for New Migrants) Bill 2021*.
<http://library.bsl.org.au/showitem.php?handle=1/12693>

² BSL 2019, *Submission to the Legal and Social Issues Committee of the Victorian Parliament. Inquiry into Early Childhood Engagement of CALD Communities*.
<http://library.bsl.org.au/showitem.php?handle=1/11753>

Through programs such as our Family Learning Support Program, we offer culturally responsive support to help connect migrant families to early childhood learning. A key pillar of this response is employing bi-cultural workers. Bi-cultural workers bring skills in speaking first language, cultural knowledge and can connect with families in their home or a community setting. In this way, they build bridges for families to access early childhood education. Other opportunities to improve cultural responsiveness include quotas to ensure adequate representation of culturally and linguistically diverse staff, focus on cultural diversity in workforce development planning, and requirements for cultural diversity plans in government-funded services.

Barrier 5: Affordability

Cost can be a substantial barrier to newly arrived families accessing services. Ensuring that services are affordable – including by expanding access to subsidies, such as the Child Care Subsidy – is key to services reaching the people who need them.

Barrier 6: Managing trauma, and the need for trauma-informed care

Often, newly arrived migrants, particularly people seeking asylum and humanitarian entrants, carry trauma from their journey. Ensuring that services are trauma-informed and deliver support to help manage trauma is an important part in making sure support is tailored to migrants' needs.

Barrier 7: Family reunification

It is essential to fast-track family reunification to ensure newly arrived communities have effective social and emotional support. Reunification can improve the mental and physical health of newly arrived communities, enhance social and economic participation of women and provide additional in-home supports to assist with care of children and to enable parents to participate in employment. Increased social and economic participation builds the ability of new migrants to access housing and meet day-to-day living expenses.

Barriers to accessing the NDIS system for temporary visa holders

The NDIS provides an example of how services can be inaccessible for certain visa types.

Eligibility for support:

- Children who are seeking asylum must rely solely on the Department of Education Early Childhood Intervention Services Continuity of Supports program (DE ECIS CoS).
- The disparity between what families can access through an NDIS plan and the DE ECIS CoS program is substantial. Children with DE ECIS CoS receive fortnightly keyworker services until they start school, while those with NDIS plans can access more intensive, individualised support tailored to their needs, including equipment not funded through DE ECIS CoS. Once children start school, there are limited or no therapeutic supports available for those who are not permanent residents or citizens, aside from what the Department of Education and Disability Inclusion funding can provide.

Clarity of information:

- Unfortunately, for migrant communities, challenges persist even after becoming eligible for services. Regarding NDIS services, the processes to access the scheme can be confusing. Often, the only support offered is translation by phone interpreters and/or brochures.

However, much of the translated information is literal and lacks field testing within the community. It is essential to recognise that accessibility, especially for multicultural individuals with disability, goes beyond mere translation. Complex concepts need to be presented in a way that is easy to understand.

Lack of appropriate translation services:

- Only registered NDIS providers can utilise Language Loop/TIS services. Most private therapy services, which are more widely accessible to families, do not offer interpreting services. This limitation automatically reduces the choice and control available to non-English speaking participants.

Summary of recommendations: improving access to services and the social safety net for newly arrived migrants, refugees and asylum seekers

- Streamline visa processing and reduce wait periods for protection applications and spousal visas to expedite migrants' access to critical services.
- Abolish the NARWP so that all new arrivals can access the Australian safety net without delay.
- Expand eligibility for key services such as NDIS, Medicare and the Child Care Subsidy to extend beyond permanent residents (e.g. to include people seeking asylum and all visa types) to reduce the risk of creating poverty traps.
- Expand availability of translated materials explaining how to access government supports – and verify the accuracy of translations.
- Expand the number of bi-cultural workers by establishing targets for workers from culturally and linguistically diverse (CALD) backgrounds in frontline services and investing in CALD workforce development programs.
- Ensure that essential services such as early childhood education are accessible and affordable to all.
- Include trauma-informed support as a criterion when designing programs.

2. Improving integration and coordination of supports through place-based delivery

Place-based initiatives employ co-design approaches to develop services, programs and priorities in collaboration with communities living in place. This ensures that responses are led by local needs, and the community is actively engaged, heard and invested in ongoing governance. BSL recommends that place-based approaches are prioritised in communities with high numbers of newly arrived families.

Integrate community voice in the design and delivery of services

In BSL's experience delivering place-based services, integrating community voice and ensuring that underrepresented groups are heard can improve outcomes and ensure that support reaches those who need it most. We recommend the following community engagement strategies:

- **Integrate community voice frameworks:** Develop commissioning models that encourage organisations to integrate community voice frameworks into their service design, planning and governance to ensure that systems remain relevant and accessible.
- **Engage underrepresented community members:** Actively seek the input of community members who are less likely to engage with services. Determine their preferences for group engagement or individualised support, ensuring that services meet their unique needs.

Increase coordination between services

Coordination of the services available to support newly arrived families can be a challenge and is often unfunded. BSL recommends two place-based responses help in addressing this challenge:

- **Develop comprehensive settlement action plans:** Develop comprehensive settlement action plans that facilitate early connections with mainstream services. Plans would support individuals during their settlement phase and indicate when they should receive the necessary assistance from Settlement Engagement and Transition Support (SETS) providers.
- **Fund coordination functions, including community connectors:** Allocate funds for coordination functions³ and roles to facilitate connections between settlement services and state-funded services. This helps establish clear pathways to services and support for refugees and newly arrived communities. One approach we have seen succeed is embedding Community Connectors in grassroots community organisations. These connectors can play a pivotal role in assisting new arrivals to establish connections with local communities, including in local clubs and support services. This is particularly vital in regional areas where support services for newly arrived communities may be limited.

Program example: Refugee Child Outreach

BSL's Refugee Child Outreach (RCO) program, is an effective early navigation service that connects with newly arrived refugee families who have children aged 0–8 years. The RCO program offers support to parents while they explore cultural differences and parenting styles in Australia. Services like kindergarten and childcare are often new ideas for families newly arrived in Australia. RCO assists parents to navigate local community resources and supports and access the early years' service system.

Gather data on need and service access

A challenge in the current system is a lack of visibility on where newly arrived families live and what supports they are accessing. An important step to improving access would be to establish data linkage systems capable of identifying cases where newly arrived children are not enrolled in critical services, especially early childhood services.

Feedback loops to inform practice improvement and learning

Tight feedback loops are a core feature of BSL's place-based work. They ensure that lessons from on-the-ground practice inform system and policy design decisions, and vice versa. We do this in several ways, including through local and national communities of policy and practice. A

³ BSL 2019, *Submission to the Review into Integration, Employment and Settlement Outcomes*. <http://library.bsl.org.au/showitem.php?handle=1/11079>

community of practice model tailored to settlement support would strengthen efforts to include newly arrived migrants in Australian society.

- **Establish national communities of practice:** Create national networks of professionals and organisations that promote collaboration across settlement providers and mainstream services. These networks could foster a culture of cooperation and knowledge sharing, particularly in reference to coordination and collaboration between government and non-government entities.
- **Foster locally embedded communities of practice:** Empower grassroots communities of practice that involve multisectoral stakeholders at the local level. These groups will play a pivotal role in shaping community-led service design, aligning local services and optimising resource allocation.

Summary of recommendations: improving integration and coordination of supports through place-based delivery

- Invest in place-based community engagement strategies that enable welcoming communities and approaches that enable citizen voice in community plans, including the voice of people newly arrived in Australia.
- Invest in the role of backbone organisations to ensure a whole-of-community approach to service coordination, pathways to employment and community harmony that promotes the inclusion of all cultural groups.
- Leverage real-time linked data to inform mainstream services of cultural groups joining a regional area so service planning can ensure capacity meets demand, and that service providers are responsive and accessible to cultural groups arriving in a local area.

3. Removing barriers to labour market participation for newly arrived migrants

A major area of focus for the Australian Government should be removing barriers to labour market participation for newly arrived migrants, to improve their integration into Australian society and strengthen economic security and wellbeing.⁴

Recognise overseas qualifications

BSL recommends that government and the National Cabinet collaborate to establish a national framework that better recognises the qualifications, skills and experiences of newly arrived individuals. This will ensure that their potential is effectively recognised and grown, and opportunities to address labour market demands are not overlooked.

⁴ BSL 2017, *A better life. Submission to Joint Standing Committee Inquiry into Migrant Settlement Outcomes*. <http://library.bsl.org.au/showitem.php?handle=1/11079>

Expand social procurement targets

BSL recommends adopting a social procurement approach and implementing quotas for federally funded contract holders to hire individuals from newly arrived communities. This approach encourages businesses to tap into the skills, capabilities and experience of people in newly arrived communities.

Offer employment services that are tailored for new arrivals

Targeted employment services that address a significant gap in the settlement service system have been shown to support the successful transition of newly arrived people into employment and education.

Currently, settlement services and employment agencies are not being equipped to provide employment support that is culturally responsive and tailored to the issues faced by young refugees and other vulnerable migrants.

BSL has extensive expertise in developing and implementing program models that support labour market participation of people of refugee, asylum seeker and migrant backgrounds. These programs include:

Given the Chance

BSL's Given the Chance, (GtC) program is specialised in working with refugees and people seeking asylum as well as other disadvantaged groups to support their entry to the labour market. GtC partners with major employers in diverse industries to provide social purpose labour hire and group training services. These partnerships have flourished especially in Victoria, in response to social procurement provisions in major government contracts. GtC has also trialled and developed bespoke recruitment services for roles with many large private employers, including in the finance and construction sectors. GtC has demonstrated the benefits of targeted employment assistance and the substantial economic and social dividend when this cohort have pathways to employment early in their settlement journey.

Youth Transitions Support

BSL's delivery of the Home Affairs funded Youth Transitions Support (YTS) program demonstrates an innovative targeted employment pathway model grounded in the capabilities approach which can inform the design of Australia's settlement and employment services. The YTS program recognises that despite having fractured educational experiences, young people have valuable capabilities and high aspirations. The YTS program utilises approaches that invest in young people's strengths and harnesses the expertise and resources of services and the local community to enable newly arrived young people to successfully study, work, build businesses and contribute to community life.

Stepping Stones

BSL's Stepping Stones program supports women from diverse backgrounds to recognise their strengths while practicing and improving their English in a social setting that builds skills, networks and social capital. Women set small business and employment goals and work with volunteer mentors to reach their empowerment, financial wellbeing and economic security goals.

Engage employers and local communities in the employment of refugees through a Community Investment Committee model

The BSL Community Investment Committee (CIC) model engages employers and local communities to identify employment, training and small business opportunities. A CIC is coordinated by Lead Partner organisations and led by local champions, bringing together critical stakeholders from services, education and training, employers, government, local council, people with lived experience and community organisations in place.

CICs can be used as a vehicle to work in place to identify the skills and strengths of people of refugee, migrant and asylum-seeking backgrounds. CIC members then provide opportunities in alignment with community needs and aspirations. CIC members may also work closely with employers in the local region to build inclusive and welcoming workplaces. In leveraging the shared commitment of members and government investments, CICs can use real-time data and local expertise to identify barriers and opportunities in employment within multicultural communities and develop strategies that benefit both community members and local employers.

Program example: Kick Start Your Career

A CIC model operating in Hume, an area with high cultural diversity supported the First Jobs Project funded by Department of Home Affairs. Named Kick Start Your Career, the project developed a tailored employment preparation program to ensure participants were equipped with the skills and knowledge to pursue employment opportunities. Young people newly arrived in Australia were able to complete work experience in line with their work aspirations and obtain ongoing employment or undertake tertiary education.

Summary of recommendations: removing barriers to labour market participation for newly arrived migrants

- Establish a national framework for recognition of overseas qualifications and invest in bridging courses to enable efficient and clear pathways for migrants, refugees and people seeking asylum.
- Develop social procurement targets for all federal government contract holders that aim to employ people from newly arrived communities.
- Develop place-based approaches to offer a suite of targeted employment pathways that support newly arrived people to reach their employment and education aspirations.
- Create structures within communities that enable collaborative design of local employment pathways that draw key stakeholders into the design process.

4. Improving communication with people for whom English is not their first language

BSL recommends the Australian Government invests in a range of programs and practices as one way to improve communication with multicultural communities. Ways to address communication skills across multicultural communities include:

- **Easy English language programs:** Establish daily easy-to-understand English language programs for the delivery of local and national news. Ensure accessibility by airing on SBS TV.

- **Digital inclusion initiatives:** Promote and allocate funding for programs that ensure comprehensive digital inclusion for all newly arrived community members. This includes providing access to technology, digital literacy mentoring and training. Importantly, provision of necessary ICT equipment, such as laptops, to families arriving in Australia as refugees should be considered.
- **Enhanced AMEP curriculum:** Revise the Adult Migrant English Program (AMEP) curriculum to cater to individual needs, interests and aspirations. Explore opportunities for learning English through employment programs or on-the-job training. Offer more flexible class times, allowing individuals to work during weekdays.
- **Expanded interpreter training:** Increase the number of trained interpreters across various sectors, including settlement services, family violence services and mental health services. For many of these interpreters specialised training and supervision are often essential, particularly when providing services to individuals facing complex challenges within multicultural communities.

Program example: English classes

BSL offers English classes in the northern areas of Melbourne. Classes are taught by local volunteers who provide opportunities for people from different cultural groups to come together. Classes engage participants in English dialogue through written and verbal activities, poem writing being a favourite. The classes enable people to learn about different cultures and ways of being and belonging in Australia. It is a platform for sharing ideas on how to access resources, networks and supports in a way that expands capabilities.

Summary of recommendations: improving communication with people for whom English is an additional language

- The Commonwealth Government should invest in digital platforms and community-based programs that improve English capabilities and reduce communication barriers across cultures, enabling people to participate and connect.

We thank you for the opportunity to review and provide feedback on Federal Multicultural Framework. We are happy to provide further information and participate development of the framework going forward.



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