

28 September 2018

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Senate Education and Employment Committees
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FECCA submission regarding the appropriateness and effectiveness of the objectives, design, implementation and evaluation of jobactive

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations.

FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from diverse cultural and linguistic backgrounds are given proper recognition in public policy.

FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind.

FECCA would welcome the opportunity to expand on this submission as required. For enquiries please contact FECCA CEO Dr Emma Campbell at emma@fecca.org.au or on (02) 6282 5755.

Recommendations

FECCA recommends that the government:

- Support job service providers to engage with their diverse client bases and to provide a tailored response to their needs, including through the provision of cultural competence training, engagement of bilingual and bicultural workers and understanding additional barriers to employment faced by CALD, migrant and refugee jobseekers

- Ensure that the employment services model emphasises locating job opportunities which are appropriate to the individual's experience, skills, qualifications and aspirations in order to yield the best long-term solution to joblessness
- Support employers so that they are sufficiently equipped with the skills needed to manage diverse workplaces including offering cultural competence training opportunities for staff, and support in designing Multicultural Access and Equity Plans
- Develop a national multicultural employment strategy that incorporates a whole-of-government approach addressing a range of issues including racism and discrimination in the workplace, worker exploitation, immigration status and employment, education, training and employment services
- Consider and address the negative impacts of stringent mutual obligation requirements and rigid job search requirements for both job seekers and employers, particularly those that disproportionately impact on women who are most likely to be responsible for the (unpaid) care of children and other family members.

Discussion

The appropriateness and effectiveness of the objectives, design, implementation and evaluation of jobactive, with specific reference to:

a) The nature and underlying causes of joblessness in Australia

Research suggests that migrants and refugees represent some of the most educated, driven and entrepreneurial members of our society¹, who are eager to contribute to Australia through meaningful employment. However CALD Australians, in particular those recently arrived as migrants from new and emerging communities or as refugees, face a number of barriers to obtaining employment.

FECCA's research has highlighted some key challenges including:

- difficulties obtaining recognition of skills, qualifications and experience earned overseas
- lack of Australian qualifications or work experience
- English language proficiency, including employer discrimination with regards to accent
- experiences of discrimination, prejudice or racism
- lack of networks for seeking and securing employment.

Broader research supports FECCA's findings, especially with regards racism and discrimination in recruitment and promotion processes. For example, candidates with names linked to specific ethnicities need to apply for considerably more job vacancies before being short-listed for an interview. As compared with applicants with Anglo-Celtic names, Aboriginal and Torres Strait Islander people must submit 35 per cent more applications, those with Chinese names must submit 68 per cent more, Italian names require 12 per cent more and 'Middle Eastern' names 64 per cent more applications². Other reports indicate that Australians of migrant background are forced to use strategies that de-emphasise racial or cultural background, for example: Anglicising their name and omitting overseas work experience or qualifications – even if relevant to the application³.

¹ CGU, Migrant Small Business Report (2018), available at https://www.cgu.com.au/migrantsmallbusiness/assets/CGU_Migrant_Small_Business_Report.pdf.

² Crawford School of Public Policy, 'Job hunt success is all in a name', 4 March 2013, available at <https://crawford.anu.edu.au/news-events/news/104/job-hunt-success-all-name>.

³ Kosny, A., Santos, I. & Reid, A. Int. Migration & Integration (2017) 18: 483; Booth, A. L., Leigh, A., & Varganova, E. (2012). Does ethnic discrimination vary across minority groups? Evidence from a field experiment. *Oxford Bulletin of Economics and Statistics*, 74(4), 547–573.

Experiencing these barriers, often in combination, means that many people from CALD backgrounds can find themselves unemployed, or employed in lower-skilled and low-paid jobs. The inability to have overseas professional qualifications recognised or to find acceptance in the Australian job market means that many migrants take jobs below their skill level – a phenomenon termed ‘occupational skidding’ by the renowned demographer the late Professor Graeme Hugo of the University of Adelaide⁴.

There is concern in many CALD communities that young CALD job seekers are channelled into insecure employment by employment services – notwithstanding the job seeker’s skill level and experience. This concern has been frequently expressed by CALD community members in FECCA’s annual Access and Equity consultations across the country. It was of particular concern for new and emerging communities who felt that young people’s experiences with job service providers were demoralising and could have longer-term impact by limiting their future professional development opportunities.

b) The methods by which Australians gain employment and their relative effectiveness

CALD Australians who may lack local work experience and the social and professional networks that others might turn to in locating suitable employment, have to rely on job service providers as a conduit to employment opportunities.

Employment services can play an essential role in assisting job seekers from CALD backgrounds to overcome challenges related to skills recognition, lower English language proficiency, lack of local professional networks, and familiarity with Australian workplace cultures and employment systems.

The effectiveness of service delivery depends on a job service provider’s ability to adequately engage with its diverse client base and to provide a tailored response to their needs. When working with CALD Australians, jobactive providers who are most effective are able to work with cultural awareness, work effectively with interpreters, understand the impact of migration on the employment journey and needs of a migrant jobseeker, and can work positively with employers to reduce barriers around overseas qualifications/experience and discrimination in hiring practices.

The lack of appropriate job service providers for CALD Australians can mean that some individuals, in their desperation to find paid employment, accept inappropriate working conditions (exploitative, unsafe or illegal). Unfortunately, these jobs are often located through word-of-mouth within cultural or linguistic communities where an employer’s understanding of a job seeker’s migration journey, a shared language (other than English) and culture, and a recognition of overseas experience, skills and qualification, makes them vulnerable to predatory labour practices. This is not an appropriate or desirable alternative to the provision of culturally sensitive and equitable job service provision.

c) The extent of consultation and engagement with unemployed workers in the design and implementation of jobactive

FECCA has found that CALD Australians are often critical of many job service providers’ lack of understanding of diverse job seekers, including their cultural backgrounds, circumstances, existing skillsets and what their migration journey means for their ability to find employment in

⁴ Hugo, Graeme, *Economic, Social and Civic Contributions of First and Second Generation Humanitarian Entrants*, First Report to the Department of Immigration and Citizenship, May 2011.

Australia. This lack of awareness and cultural competence translates into client dissatisfaction with the service and inadequate support.

Community members have shared with FECCA instances where jobseekers with low English proficiency and poor digital literacy have been directed to a web search engine or newspaper to look for employment opportunities. They explained that this was despite the service provider having difficulty communicating in English with their client – evidence that language support services were crucial, and that the client required additional or intensive assistance in navigating the process to finding employment. Stories such as this can circulate in CALD communities generating distrust of job service providers (specific providers or in general).

Community members have also shared with FECCA instances where job service providers have failed to discuss work history, and experience/skills acquired in the home country of migrant or refugee jobseekers. Cultural competence requires that job service providers understand that jobseekers from overseas may come from countries with different certification or accreditation systems, and to also recognise the value of skills that may have been acquired without a formal certification.

These instances indicate that the design and implementation of jobactive does not adequately reflect the specific needs of CALD jobseekers.

d) The ability of jobactive to provide long-term solutions to joblessness, and to achieve social, economic and cultural outcomes that meet the needs and aspirations of unemployed workers

FECCA is concerned by reports that some job service providers only assist individuals who are perceived as easy to place into work. Many CALD jobseekers have complex needs which require additional resources, effort and energy to successfully place them in employment⁵.

Migrant and refugee job seekers may have skills and qualifications that are not recognised in Australia. Many CALD Australian, migrant and refugee job seekers find themselves deskilled or underemployed as part of their engagement with employment services⁶. FECCA believes that an employment services model that emphasises locating job opportunities which are appropriate to the individual's experience, skills, qualifications and aspirations is likely to yield the best long-term solution to joblessness.

FECCA's research indicates that while CALD populations are increasing, employers are not sufficiently equipped with the skills needed to manage diverse workplaces. Helping employers to provide welcoming workplaces for CALD employees is likely to result in greater job satisfaction and well-being for both employers and employees. Supporting job service providers to offer cultural competence training opportunities for staff, and support in designing Multicultural Access and Equity Plans would also help to improve long-term employment solutions for CALD jobseekers.

More broadly, in order to improve outcomes and services for disadvantaged CALD, migrant and refugee job seekers, FECCA recommends that the Australian Government develop a national multicultural employment strategy that incorporates a whole-of-government approach⁷. The strategy should address a range of issues including racism and discrimination

⁵ Per Capita, 'Working it Out: Employment Services in Australia' (2018), p38, available at <https://percapita.org.au/wp-content/uploads/2018/09/Working-It-Out-FINAL.pdf>.

⁶ Ethnic Communities' Council of Victoria (2014), 'Work Solutions: Improving Cultural Diversity and Inclusion in the Workplace', available at http://eccv.org.au/library/FULL_REPORT_ECCV_Work_Solutions_Discussion_Paper_Feb_2014.pdf.

⁷ Refugee Council of Australian and Fairfield City Council, 'Not working: Experiences Of Refugees And Migrants With Jobactive, August 2017, available at <https://www.refugeecouncil.org.au/wp-content/uploads/2017/08/Jobactive.pdf>.

in the workplace, worker exploitation, immigration status, education, training and employment services.

e) The fairness of mutual obligation requirements, the jobactive Job Plan negotiation process and expenditure of the Employment Fund;

Unrealistic mutual obligation requirements can at times, impact the ability of migrant job seekers to manage job readiness and family commitments while also looking for employment. Job seekers are required to attend jobactive appointments that may conflict with English language learning or other commitments including childcare or family support – this means that migrant and refugee job seekers must choose between supporting their families, improving their job readiness and finding sustainable employment.

The negative impacts of stringent mutual obligation requirements and rigid job search requirements for both job seekers and employers should be considered and addressed. This conflict of obligations disproportionately impacts on women who are most likely to be responsible for the (unpaid) care of children and other family members.

i) The funding of jobactive, including the adequacy of the ‘outcome driven’ funding model, and the adequacy of this funding model to address barriers to employment;

FECCA argues that an employment services framework which emphasises job placement (placing job seekers in jobs for varying time periods as measure of success of service) as opposed to responding to the job readiness of job seekers significantly disadvantages CALD Australian, migrant and refugee job seekers. A framework which focuses on job readiness would result in processes and outcomes which are individualised and tailored to the specific needs and circumstances of individual job seekers.

For some individuals a successful outcome as part of an engagement with employment services would be participation in English language courses, for others it might be ensuring the translation of an overseas qualification or participation in professional body registration processes. For CALD Australian, migrant or refugee job seekers it is important that they are not punished for failing to meeting unrealistic compliance or mutual obligation requirements. In particular, FECCA is concerned that arbitrary time limits around access to services do not realistically or equitably support CALD Australian, migrant and refugee job seekers to successfully (re)enter the Australian workforce.

j) Alternative approaches to addressing joblessness.

FECCA believes that improving the cultural competence of job service providers through appropriate cultural competence training would help to address joblessness for CALD jobseekers. Providers who understand the complexities and specialised needs of CALD job seekers are better equipped to assist them in successfully securing employment. Initial assessment by job service providers should recognise additional barriers faced by CALD job seekers and provide services to improve job readiness.

Services could include:

- English language proficiency for job skills. For example, some individuals may speak well but not write well or vice versa – tailored English language training could be provided to address skills gaps
- development through further education and training, including job specific training that meets the needs of employers and matches the skills and aspirations of job seekers
- support with transport, housing, driving tests, childcare, family violence, clothes and other key barriers that impact the ability to find sustainable employment

- subsidies provided to migrant and refugee jobseekers to assist with the significant financial outlay required to have relevant overseas qualifications and training recognised in Australia
- tailored support in resume writing, selection criteria and interview skills
- access to interpreters and bilingual workers.

FECCA has provided a detailed submission to The Next Generation of Employment Services discussion process which includes broader analysis of the role of job service providers in assisting CALD Australians to find employment⁸. The Committee may find that submission useful to consider with regards an evaluation of jobactive in the broader context for CALD Australian jobseekers.

⁸ <http://fecca.org.au/wp-content/uploads/2018/08/FECCA-Submission-Regarding-Employment-Services-Discussion-Paper.pdf>