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Human Services Inquiry
Productivity Commission
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Reforms to Human Services

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 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.

Request for information 2: Greater user choice

As outlined in FECCA's initial submission, the quality, level and accessibility of information about services must be improved and provided in formats and forums that reflect the diversity of the population. This will assist users to exercise informed choice.

In order for users to exercise informed choice, consumers need to be supported through individual advocacy in competitive markets. This can increase a consumers' ability to exercise choice and control. As suggested by FECCA in our initial submission, an effective advocacy framework plays a key role in empowering individuals to be proactive self-advocates, assisting individuals to navigate through the services available to them and educating them of rights, entitlements and complaint mechanisms.

FECCA encourages adopting an approach whereby organisations specialising in providing advocacy services for people from non-English speaking backgrounds receive additional funding to account for the costs associated with developing capacity to provide culturally appropriate advocacy services, for example, staff training and offering language services.

Importantly, advocacy services must extend beyond the initial stage of planning and provide assistance to the consumers to identify the most suitable service providers for them, change their chosen service provider if the consumer is not satisfied with the services rendered, lodge complaints and participate in community, and cultural events to ensure that they are fully and actively engaged in the community.

Quality of information is vital in providing greater user choice. It is vital to employ a number of information provision mechanisms including use of ethnic newspapers and radio.

Information should also be provided in other languages where practical through interpreters and translated documents. It is important for the Government to develop certain minimum quality standards in relation to translations, particularly relating to accuracy and cultural appropriateness of the language used in the translated materials.¹

Request for information 3: Introducing greater competition and contestability

Competition and contestability can reduce the ability of small organisations to successfully tender/apply for funds, to meet the operating criteria required for market-oriented systems and to reach the necessary number of consumers quickly to maintain a sustainable operation. This can be particularly detrimental to 'niche' providers such as ethno-specific organisations that service particular communities. When processes are too complex or do not put enough emphasis on relevant expertise, smaller ethno-specific organisations can be replaced by larger, mainstream organisations that might not have the requisite cultural competency. Consumers of services must be assured that all services available meet a minimum standard in relation to cultural competency in service delivery.

Ongoing education, training and support for small service providers, in particular ethno-specific services, in relation to competing in the current consumer directed care model, will provide the much needed assistance to sustain the service provider.

Often, smaller community organisations are not aware of the options such as developing partnerships or entering into auspicing arrangements with other more established organisations or service providers. For example, the NDIS Information, Linkages and Capacity Building Framework has developed a 'toolkit' to assist organisations to apply for funding, which provides detailed information in relation to partnerships and collaborations.²

The time between the announcement of a grant/tender round and the deadline for applications is often very short, making it difficult for organisations to explore possible opportunities for formal collaboration. Extending this period would allow greater opportunity for organisations to develop and agree upon a collaborative application.

Request for information 4: Government stewardship arrangements

Consumer oriented models cannot rely consumer demand and market mechanisms alone to develop sufficient quality, choice and breadth of services. Thus, Government should implement appropriate regulations with stringent oversight powers to safeguard the rights of the consumers. Users should also have access to advocacy services, to ensure that they have the appropriate support to communicate to service providers their needs. Robust appeal and complaints processes are crucial to ensuring that users get access to the services that they need, and to drive systemic change if providers are consistently denying customers access to service for which they are eligible.

Co-payments can be effective in some areas if they are appropriate for example, a co-payment towards an educational course can encourage individuals to be invested in successful completion of a course of study. Co-payments are not effective or equitable

¹ See further: FECCA, *Translating Documents for Community Use: Getting it Right*, <http://fecca.org.au/wp-content/uploads/2017/01/Translating-Documents-for-Community-Use-getting-it-right.pdf>

² NDIA, *NDIS ILC Toolkit, Partnering and collaborating*, accessible at: <https://ilctoolkit.ndis.gov.au/grants/partnering-and-collaboration>

where they impede access to critical services such as health, disability, welfare and crisis services.

A number of rules should be established to support effective service delivery, including:

- Quality frameworks
- Effective complaints processes
- Multicultural access and equity requirements

Where an appropriate body already exists, government should adequately resource existing bodies to monitor and oversee these frameworks. Where such a body does not exist government should establish new independent bodies.

It is crucial that government monitoring, evaluation and feedback functions, include the collection and disaggregation of data on factors such as:

- country of birth;
- main language spoken at home;
- religious background (where applicable);
- ethnicity; and
- English language proficiency

This data can be cross-referenced with other indicators including gender, age, income, and migration status. Better collection and disaggregation of data can provide valuable insights into who is accessing services and gaps in access, and inform the development of policy and responsive services.

End of life care

Request for information 18: Potential for greater competition, contestability and user choice in end-of-life care

In a climate where culturally appropriate care under the current home and residential care for older people from CALD backgrounds is scarce or inadequate, additional choice and competition in end of life care for older people from CALD backgrounds is an admirable but unlikely medium or short-term goal. Many people from CALD communities are not aware of the palliative care supports available to them and do not plan the end of life needs. Projects such as “compassionate communities” movement, through the aged care providers, promotes and integrates social approaches to dying, death and bereavement by building community capacity around end-of-life care and support.³ Projects of this nature should be made more accessible to people from CALD backgrounds.

Service providers who are capable of catering for the cultural, linguistic and religious needs in end of life care both in home care and residential care settings are already in short supply. Further, terminology used in this context including, contestability, competition and the like, may be culturally inappropriate and may deter people from seeking further information in relation to the end of life care.

³ See further: *Aged care providers central to community-led palliative care: expert*, accessible at: <http://www.australianageingagenda.com.au/2017/02/10/aged-care-providers-central-community-led-palliative-care-expert/>

With regards to how best to coordinate care, people from CALD backgrounds have multiple diverse characteristics that overlap and alter their specific needs and how they access and interact with services including palliative care. In some CALD communities, important health decisions are made by the family as a unit, including the patient who is receiving end of life care. Due to cultural norms and practices, in addition to the primary carers, caring responsibilities are borne by other family members as well. Thus, consideration will have to be given to the role of the family when coordinating end of life care services. Such coordination can be done through the support of an independent advocate.

Commissioning family and community services

Request for information 28: How commissioning arrangements influence the effectiveness of service delivery, with particular regard to users with complex needs, such as CALD Australians who require access to multiple services

As highlighted in FECCA's previous submission, people from CALD backgrounds need additional supports in navigating the system of service delivery. They often look to cultural community groups, community and religious leaders for information, advice and support to connect with services, and to negotiate service changes as their needs and requirements change. Engaging the community groups to educate them about the service models and available supports, and funding them to provide culturally appropriate advocacy services will be beneficial to many people from CALD backgrounds.

Newly arrived migrants and refugees are usually not familiar with Australian support systems and service mechanisms. Multicultural and settlement organisations, as the first point of entry for new immigrants into mainstream Australian society, play a significant role in helping transition migrants from their home countries to Australian life, and this is of key importance for fostering their latent contributory powers.

Ethno-specific organisations should be resourced to help new arrivals and community members, as a supplement to settlement services. FECCA also notes that there should be capacity for organisations *outside* the settlement space including organisations working on family violence, employment and housing to collaborate with settlement service providers, to provide holistic support for multicultural communities.

In addition to helping people navigate the system, an effective communication mechanism that caters for specific needs including language needs of the diverse communities must be in place to inform the support recipients about the policy and regulation changes that affect the services they receive.

Request for information 30: How to improve government processes for commissioning family and community services

The type of service and intended service users should be taken into account when determining the type of funding arrangement. Where the intended service users are predominantly from vulnerable groups, or will be best serviced by niche providers, block funding will be more appropriate.

Request for information 31: Implementation of reforms to improve arrangements for commissioning family and community services

Government should use a variety of methods to improve the planning and delivery of human services, including:

- Population data
- Service use data, to identify who is currently using services and whether there are any gaps in access
- Consultation with community members and groups about their experience accessing services, and what issues are concerning their communities
- Consultation with service providers to discover their observations about service needs and delivery

FECCA thanks the Productivity Commission for this opportunity to provide input into the reforms to human services inquiry process.