

19 May 2017

Department of Immigration
and Border Protection
6 Chan St, Belconnen
Canberra ACT 2617

Submitted via email: humanitarian.policy@border.gov.au

Submission to Discussion Paper: Australia's Humanitarian Programme 2017-18

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 linguistically diverse 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.

Key message

FECCA supports any increase in Australia's humanitarian intake. The Community Support Program (CSP) represents a creative initiative in this area. However, FECCA is concerned that programs like the CSP will be undermined by perceptions that they are designed as a revenue stream, rather than a genuine attempt to augment Australia's humanitarian efforts. Whilst the CSP is a positive development, the costs associated and the inequity of access require examination.

Further, FECCA is concerned that these programs are purported to provide additional pathways for entry, but in fact form part of the proposed numbers of humanitarian intake. In this sense the programs detract from the Government's commitment because they provide for proposing organisations or individuals to assume some of the Government's responsibility rather than augment it. FECCA emphasises that it supports the CSP, but submits that any process for entry through these programs should be in addition to, rather than forming part of, Australia's core humanitarian intake. Further, consideration should be given to broadening the geographical reach of the programs, reducing the cost and examining ways of extending the benefits to the most vulnerable applicants.

Federation of Ethnic Communities' Councils of Australia

FECCA House, Unit 1, 4 Phipps Close, Deakin ACT 2600 • PO Box 344, Curtin ACT 2605

 02 6282 5755  admin@fecca.org.au  www.fecca.org.au  @iFECCA

ABN 23 684 792 947

At all times Australia's primary consideration should be the fulfilment of its legal and moral obligations to the international community. The humanitarian intake program is an opportunity for Australia to demonstrate its commitment to maintaining its role as model global citizen. Caution should be exercised in pursuing any approaches that infringe upon or conflict with that primary consideration. Assisting the most vulnerable is and must remain Australia's first priority.

Encouraging private entities to engage more with humanitarian entrants to ensure better outcomes in terms of employment and self-sufficiency may require consideration of a range of incentives. Increasing the extent to which government helps promote the benefits of refugee settlement may be a key measure in enhancing community engagement with the process.

Recommendations

- **The number of places available for the Community Support Program should be allocated in addition to the proposed expansion of Australia's Humanitarian Programme to 16,250 places in 2017-18 and to 18,750 places in 2018-19.**
- **The costs associated with the Community Support Program should be reduced.**
- **The number of organisations registered as Approved Proposing Organisations (APOs) should be expanded to ensure that potential applicants are not disadvantaged by geographic location, whilst ensuring that the Organisations are equipped to provide a consistent and sufficiently high level of support.**
- **Provide incentives and acknowledgement for business demonstrating diversity in their workforce to include humanitarian entrants.**

Additional pathways and places for humanitarian entry

The Community Support Program is a unique opportunity in that it builds on the relationship that exists between the local community and the refugee arrival. It encourages broader local involvement, develops social capital and facilitates support organisations to work with non-traditional partners. In this sense it is a very positive development.

The Department of Immigration and Border Protection (DIBP) Discussion Paper notes that 1000 places have been allocated for this program.¹ FECCA is concerned that the 1000 places DIBP refers to are to form part of the core number nominated for humanitarian entrants rather than operating additionally. The effect of this is twofold. First, it broadly normalises the notion that settlement of humanitarian entrants is a responsibility to be borne by specific individuals or organisations, rather than the nation as a whole. Second, it prioritises individuals who are able to establish community ties and the necessary funds. By definition this disadvantages further the most vulnerable of applicants.

If the places allocated for the CSP were specifically recognised as being addition to the core humanitarian stream, it would be clear that this program provides opportunities for those with the capacity to do more. It can be seen as an additional means of bolstering the number of displaced and traumatised persons to whom Australia can offer assistance.

The Canadian Models

¹ Department of Immigration and Border Protection *Discussion Paper Australia's Humanitarian Programme 2017-18*, 12[3].

The Canadian Government provides for a number of pathways to humanitarian entry in which private entities can be involved. Some of these include opportunities for private entities and government to absorb the cost cooperatively.² It is the view of FECCA that consideration should be given to developing similar models domestically. This will ensure that organisations wanting to contribute to increasing humanitarian entry but unable to absorb the total costs involved with the CSP are provided with an option. FECCA stresses that these options should not be considered as a means of displacing the costs of settling existing numbers of humanitarian entrants, rather another option for Australian businesses and organisations to contribute additionally.

Costs

It is FECCA's view that the costs associated with the CSP are prohibitive. Bonds, administrative costs, visa fees and associated expenses currently total in excess of \$30,000.³ These charges render the scheme beyond the scope of all but the most well-resourced and connected of applicants.

If the Commonwealth is interested in having more businesses, private and community organisations and individuals taking an increased role in the sponsorship and settlement process reducing the costs significantly would provide clear incentive.

Expansion of the APO model

There are currently five organisations granted status as APOs.⁴ Whilst these organisations have generally ensured positive engagement between proposing organisations and their broader communities and have generally ensured high levels of support, their reach is limited.

To ensure that there is equitable access to the program, consideration should be given to expanding the number of organisations appointed as APOs. In doing so, care should be taken to ensure that rural and regional areas are not precluded from participation. This means not only expanding the number of organisations but the geographic reach of those organisations. Rural and regional areas can derive enormous benefit from well-managed humanitarian settlement.⁵ Communities in regional areas should be supported to build capacity to participate effectively in the CSP.

Further, care should be taken in ensuring that any expansion of the program does not lead to the appointment of organisations ill-equipped to provide the necessary levels of support. Any expansion of the program must require organisations to demonstrate sufficient levels of community engagement and expertise in working cooperatively with networks of service providers to create a holistic approach to settlement.

APOs should also be funded to engage legal service providers to ensure that applicants and the proposing agencies are given the opportunity to obtain advice regarding the compliance, merit and formalities of any application.

Encouraging, Acknowledging and Incentivising private sector participation

² Canadian Immigrations and Citizenship *Blended Visa Office-Referred Program – Sponsoring refugees* <http://www.cic.gc.ca/english/refugees/sponsor/vor.asp> and *Joint Assistance Program – Sponsoring refugees with special needs* <http://www.cic.gc.ca/english/refugees/sponsor/jas-who.asp>

³ Law Institute of Victoria *Community Support Programme Submission* <https://www.liv.asn.au/getattachment/4ee132b7-d56d-4fec-a279-b15216e60bd9/Community-Support-Programme-Discussion-Paper-June-.aspx>

⁴ Community Proposal Pilot, 2017, *Community Proposal Pilot* <https://cpp-apo.net/>

⁵ Vasey, K., and Manderson, L. 'Regionalizing Immigration, Health and Inequality: Iraqi Refugees in Australia' *Journal of Administrative Sciences* Vol 2 (2012) [47]-[62]

It is important to acknowledge that settlement for migrants requires a whole-of-community approach. This is particularly so in relation to refugees and other displaced persons. FECCA recognises that Australia as a nation has often been an example to the world in welcoming refugees. However a combination of global events and increasingly negative rhetoric has reduced support for, and understanding of, the circumstances of refugee and humanitarian entrants. It is FECCA's view that a concerted campaign at the Commonwealth level would help to address this. Involvement 'from the private, educational and community sectors to assist humanitarian entrants to secure stable employment and achieve self-sufficiency' will only improve as broad support for humanitarian intake improves. In many ways government at a federal level has a unique opportunity to build that support. In the language it uses when referring to refugee and asylum seekers, government frames the public's perception. The Commonwealth, as the administrator of refugee intake is uniquely placed to chart an entrant's journey from arrival to settlement. Sharing some of the positive stories in this process encourages the community not only to see humanitarian entrants as victims in need of protection and assistance, but assets with the potential for great contribution. The 150 Stories Project⁶ provides an instructive example for how to undertake such tasks. This project seeks to celebrate the diversity and richness of experience that includes the contribution of refugee arrivals by promoting stories of individual experience.

Notwithstanding the above, FECCA remains aware that positive messaging alone may not be sufficient to improve the employment outcomes for refugee arrivals. In this regard incentivisation and acknowledgement may be required to encourage business to do more. How best to do this may require further examination but business is likely to respond to measures that provide financial incentive to diversify their workforces to include more employees from refugee backgrounds. Further reputational advantages achieved through some system or scheme for public acknowledgement of businesses who achieve levels of diversity which include humanitarian arrivals should be explored. This is particularly important in the case of larger employers who have the capacity to absorb any costs associated with additional training and investment in such employees. It is also important because larger entities have the capacity to undertake larger recruitment programs. This has the combined benefit of demonstrating broadly the benefits of employing humanitarian arrivals, thus enhancing community perception. Particular consideration should be given to a scheme that allows for recognition of entities that demonstrate humanitarian arrivals employed in senior and executive roles. Again this demonstrates the benefits of filling those roles in such a way and also demonstrates to humanitarian entrants that the pursuit of meaningful and well-paid employment is one which Australia rewards.

Conclusion

FECCA believes that Australia should constantly be striving to do more to settle displaced persons through its humanitarian intake program. This is particularly so in relation to global events that have created extraordinary numbers of displaced persons. The Community Support Program is an excellent example of initiatives that achieve this goal. It must however be delivered in ways which enhance Australia's efforts. Accordingly places allocated for CSP entry should be an addition to, rather than within, the core of Australia's humanitarian intake program.

The costs involved should be managed in such a way so as not to deter interest by committed, but less well-resourced, organisations and individuals. Further geographic expansion of the program should ensure broad access but consistent and effective support.

In attracting community participation in the broader process of settlement, including employment, the government should consider utilising its unique position to celebrate

⁶ Canadian Race Relations Foundation 'Our Canada-150 Stories' <http://www.crrf-fcrr.ca/en/our-canada/150-stories>

refugee arrivals and their contribution. The government should also consider how to best incentivise financially and acknowledging publically organisations committed to creating employment outcomes for new arrivals, including those from the humanitarian stream.

FECCA appreciates the opportunity to contribute to the national conversation on humanitarian intake and would welcome any opportunity to provide comment. In this regard please contact the FECCA secretariat at emma@fecca.org.au or call our offices on (02) 6282 5755.

Thank you