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### **FECCA submission regarding the Independent Review of the Australian Public Service (the APS review)**

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](mailto:emma@fecca.org.au) or on (02) 6282 5755.

#### **Recommendations**

FECCA recommends:

- that the APS implement affirmative measures to increase the numbers of employees of CALD background
- that the APS implement affirmative measures to increase the numbers of employees of CALD background in senior executive positions, with a particular focus of women of CALD background
- that the APS collect and publish data about workforce diversity including attraction, retention and promotion of CALD Australians
- that the APS be more proactive in ensuring cultural and linguistic competence form part of the inherent culture of the public service workplace and service delivery
- that citizenship requirements do not unfairly exclude otherwise suitable candidates from employment within the APS by virtue of their immigration status

## **Discussion**

FECCA commends the APS for the establishment of the Secretaries' Equality and Diversity Council. The Council demonstrates commitment by the government to ensure diversity and inclusion within the APS. FECCA commends the work of the Council in devising and implementing diversity strategies including the Gender Equality Strategy, the Commonwealth Aboriginal and Torres Strait Islander Employment Strategy and the APS Disability Employment Strategy, however the absence of a strategy for CALD Australians is of great concern.

FECCA recommends the creation and implementation of a diversity and inclusion strategy that explicitly addresses CALD Australians, including affirmative measures to increase the number of CALD employees across all levels of the APS.

### **Employee diversity in the APS**

In the 2016 Census<sup>1</sup>, 26% of Australians were born overseas and 20% of Australians had at least one overseas born parent. In the same year, 21% of Australians spoke a language other than English at home and there were over 300 languages spoken in Australian homes.

The Australian Public Service should be a reflection of Australian society, to work for, and represent the needs of, all Australians at a Commonwealth level. In order to ensure this, the APS needs to be made up of individuals from a broad cross-section of Australian society and in broadly proportionately representative numbers. This representation needs to be visible across the APS as a whole, across individual departments, and across all employment levels including the senior executive positions.

The most up-to-date publicly available data on employment demographics across the APS indicate that 'the proportion of APS employees who identified as being from a non-English speaking background'<sup>2</sup> is 14 percent<sup>3</sup>. This compares with the figure of 5.4% in 2012-13.

The definition used for the APS data collection in 2012-13 was that 'people from non-English speaking backgrounds are defined as those who were born overseas and arrived in Australia after five years of age and whose first language was not English'<sup>4</sup>. It is not clear which definition was used for the most recent data collection but if the same data collection parameters were used, the reported cultural and linguistic diversity of the APS has increased over the past decade.

Whilst 'non-English speaking background' is one way of capturing data on culturally and linguistically diverse Australians, FECCA argues that utilising nationally consistent data categories are more useful as they provide opportunity for comparing data sets more accurately. Nationally consistent data categories similar to those used by the Australian Bureau of Statistics would provide the APS with a clearer understanding of the representation of CALD Australians in the workforce, and assist in devising targeted strategies to address identified gaps.

FECCA notes that the level of reporting on CALD employees in the APS as part of the 'State of the Service Report' has incrementally diminished in recent years. The 2012-13 report provided specific data on 'Employees from a non-English speaking background', including data on employee engagement and attraction, employee experience, satisfaction and intention to leave. The 2016-17 State of the Service Report, under the 'Representation of diversity in the APS' section, provided limited information on Indigenous Australians and

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<sup>1</sup> <http://www.abs.gov.au/ausstats/abs@.nsf/lookup/Media%20Release3>

<sup>2</sup> <https://www.apsc.gov.au/sites/g/files/net4441f/SOSR-2012-13-chapter-5.pdf>

<sup>3</sup> [https://www.apsc.gov.au/sites/g/files/net4441f/2016-17\\_sosr.pdf](https://www.apsc.gov.au/sites/g/files/net4441f/2016-17_sosr.pdf)

<sup>4</sup> <https://www.apsc.gov.au/sites/g/files/net4441f/SOSR-2012-13-chapter-5.pdf>, p108

people with disability only. FECCA notes with concern that there was no reference to CALD employees in the APS.

FECCA recommends that the APS annually publish data regarding workforce diversity including attraction, retention and promotion of CALD Australians. Data assists in identifying gaps, risks and areas for improvement within the workforce and recruitment policies. Once these have been identified, organisations can create strategies to address them. The publication of data will also assist in ensuring that departments and agencies are accountable for the objectives outlined in their Multicultural Access and Equity Plans, and that diversity and inclusion strategies receive appropriate attention from senior leaders.

### **CALD leaders in the APS**

CALD employees are under-represented in senior leadership positions across business, academia, parliament and government departments and agencies in Australia. While Australian society is incredibly culturally and linguistically diverse, the Australian Human Rights Commission reports that of 124 heads of federal and state departments, less than 2% of leaders have a non-European background.<sup>5</sup>

Evidence suggests that female employees from a CALD background face further difficulties in attaining leadership positions in Australian organisations. A recent report by the Diversity Council of Australia *Capitalising on Culture and Gender in ASX leadership* (2017)<sup>6</sup> found that:

- The number of women ASX leaders from CALD backgrounds is very small: only 15 of all 1,482 CEOs, 44 of all 2,327 senior executives, 188 of all 7,491 directors and 55 of all 1,350 CFOs.
- The percentage of women ASX leaders from CALD backgrounds appears to have plateaued between 2013 and 2015 – for almost all ASX groupings (i.e. ASX overall, ASX 500, ASX 200, ASX 100) and all roles, whether a broad or narrow definition of culturally diverse is used.
- Only 2.5% of all 7,491 ASX directors were women of CALD background, compared to 5.7% who were non-CALD women, 27.8% who were men of CALD background and 64.0% who were non-CALD men.

FECCA argues that Australian women of CALD background are affected not only by a range of gendered employment and economic issues such as the gender pay gap, but also by curtailed opportunities due to their cultural, linguistic and ethnic identities. These become more evident in the more senior employment positions as shown by the ASX leadership data. Whilst FECCA understands that the APS data on women of CALD backgrounds indicates that their participation in mid-level positions is quite good, there is room for improvement with regards senior executive positions, and in ensuring that they are well represented across all APS departments and agencies.

The ability to successfully attract, develop and provide leadership pathways for CALD Australians, should be reflected in diversity of employees at all levels of the APS. Current figures suggest that the APS faces challenges in recruiting, retaining and promoting CALD staff.

CALD Australians who reach leadership or senior positions have career pathways which are facilitated by good mentoring and networking. It is important for people of CALD background in more junior positions within the APS to see employees from similar backgrounds in leadership roles so they know that career advancement and a pathway to the top is *possible*. FECCA encourages the APS to implement a range of measures to ensure appropriate

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<sup>5</sup> Australian Human Rights Commission, 'Leading for Change A blueprint for cultural diversity and inclusive leadership', 2016, available at [https://www.humanrights.gov.au/sites/default/files/document/publication/2016\\_AHRC%20Leading%20for%20change.pdf](https://www.humanrights.gov.au/sites/default/files/document/publication/2016_AHRC%20Leading%20for%20change.pdf).

<sup>6</sup> <https://www.dca.org.au/research/project/capitalising-culture-and-gender-asx-leadership>

mentoring, networking, and career development pathways for people of CALD background, with a particular focus on initiatives for CALD women.

FECCA strongly encourages the APS to become the leader in providing equitable access to career promotion and professional development to employees from CALD backgrounds to ensure that Australia's diversity is reflected in the APS at all levels.

### **Cultural competence**

There is an immense opportunity to encourage and improve cultural competence within government departments and agencies. Cultural competence at the organisational level involves developing systems, policies and processes that foster and encourage cultural and linguistic diversity. Organisations with high levels of cultural competence are able to cultivate diverse workforces, using cultural difference as a strength for more effective decision-making, innovation and adaptability. They also understand the cultural profiles of the communities they serve, and provide services that are representative of, and equitably accessed by, all Australians.

There are a number of ways that the APS can demonstrate commitment to cultural and linguistic diversity and cultural competence across all departments and agencies, including:

- Prioritising cultural competence training as an integral part of workforce development and training
- Allocating funding and resources towards cultural competence training for all staff, including senior leadership
- Prioritising face-to-face or blended learning opportunities over online training programs
- Recognising cultural competence as a valued skill in the workplace and reflecting this in recruitment policies and selection criteria

Cultural competence training is an integral part of fostering diverse and inclusive workforces within the APS. FECCA research suggests that in fast paced and demanding workplaces, cultural competence is often considered an issue of second importance amongst other competing priorities. Additionally, leaders without lived experience often undervalue the need to engage in cultural competence training. However FECCA believes that there is a great opportunity for the APS to provide leadership in this area, ensuring cultural and linguistic competence form part of the inherent culture of the public service workplace and service delivery.

### **Citizenship as a requirement for APS employment**

FECCA understands that Australian citizenship is often required for employment within the APS. This may be part of selection criteria depending on the department or agency, or may arise from the need to obtain a security clearance, for which Australian citizen is compulsory. For residents who are not yet eligible to apply for citizenship, or for those who are beginning their application, the process of obtaining Australian citizenship can take a number of years. This results in the exclusion of strong candidates who are otherwise suitable for APS roles, by virtue of their immigration status. Recent proposals to lengthen the number of years of residency before an individual is eligible to apply for citizenship would have impacted further on the ability of otherwise suitable candidates to take up APS employment opportunities.

FECCA acknowledges that for certain roles within the APS, obtaining Australian citizenship or undergoing a security clearance is a vital part of ensuring the security of the Commonwealth. However, where APS roles do not require contact with sensitive information, FECCA recommends that appropriate potential candidates should not be excluded from applying for a vacancy on the basis that they do not have Australian citizenship. This is in the interest of

ensuring that 'all eligible members of the community are given a reasonable opportunity to apply to perform the duties'.<sup>7</sup>

FECCA recommends that the APS review the appropriateness of citizenship and security clearance requirements for particular roles that may disadvantage those who are ineligible or awaiting citizenship, thus restricting otherwise suitable candidates from gaining employment within the APS.

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<sup>7</sup> <https://www.legislation.gov.au/Details/F2016L01430/Explanatory%20Statement/Text>