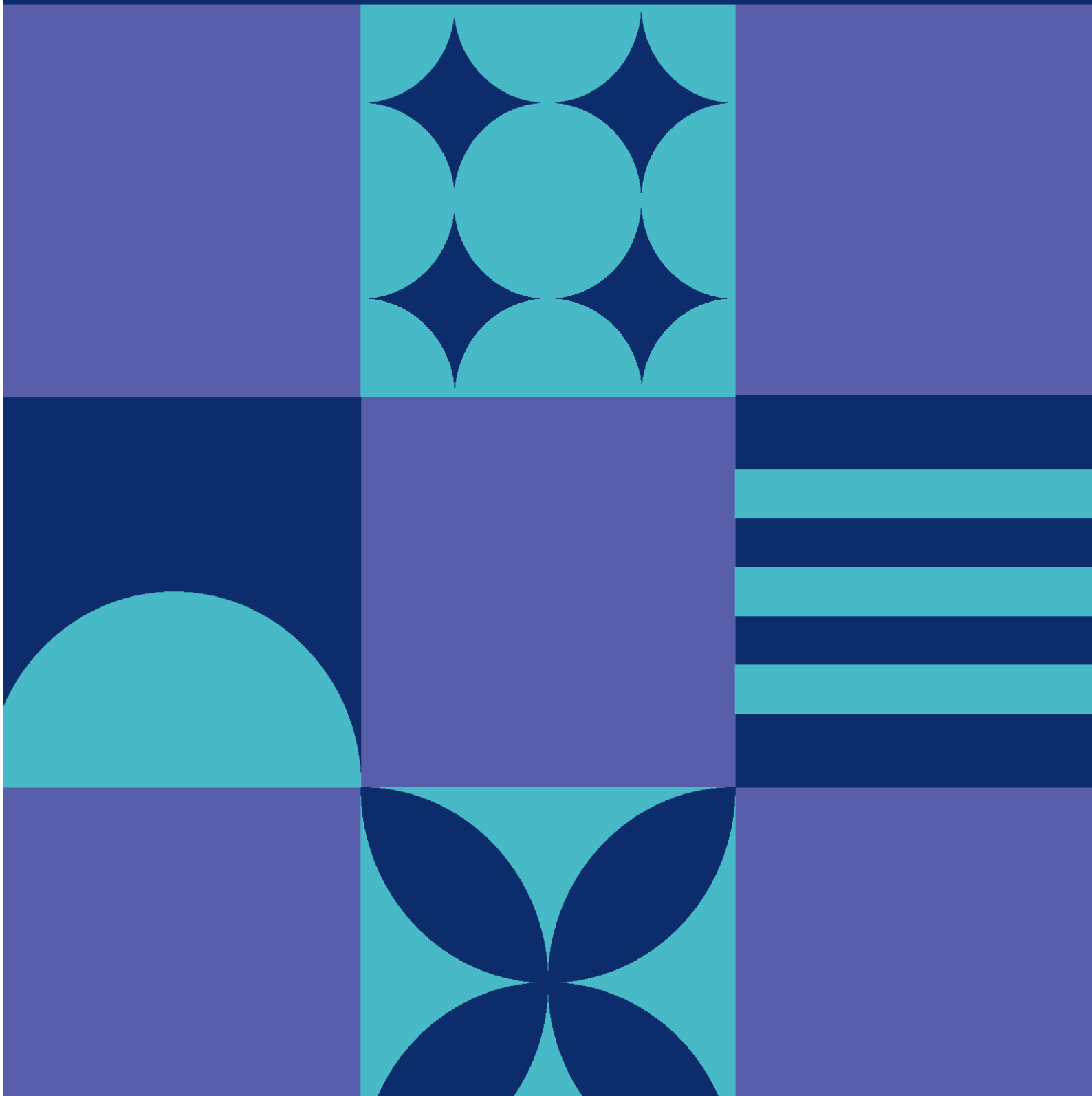


Submission to the Discussion Paper: Australia's Humanitarian Program 2026–27

30 April 2026



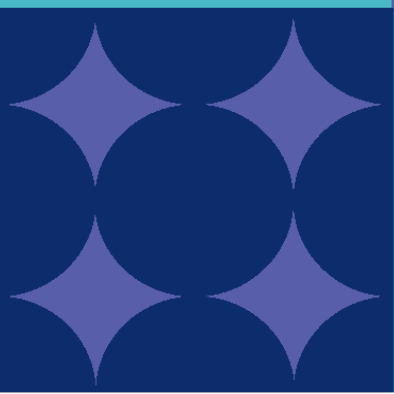


Who we are

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing people from multicultural communities and their organisations across Australia. Through the membership of state, territory, and regional councils, we represent over 1,500 community organisations and their members.

What we do

For 45 years, FECCA has proudly worked alongside culturally and linguistically diverse communities, the broader Australian society, and the government to build a successful, productive, and inclusive multicultural Australia where everyone, no matter their background or how long they have lived in this country, has opportunities to reach their full potential and contribute to the Australian nation. FECCA draws on the lived experiences of the people and their descendants who have migrated to Australia and the expertise of its extensive and diverse membership to develop and promote inclusive, innovative and responsible public policy that reflects the needs and perspectives of multicultural Australia. We are committed to building a strong, innovative and inclusive nation that harnesses its greatest strength, the diversity of its people.



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Who We Are

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing people from culturally and linguistically diverse (CALD) communities and their organisations across Australia. FECCA's strength and legitimacy are grounded in its membership of state, territory, and regional Ethnic and Multicultural Communities' Councils (ECCs/MCCs), which collectively represent more than 1,500 multicultural community organisations nationwide.

Through this federation model, FECCA provides a collective national voice on issues including migration, settlement, workforce participation, skills recognition, social cohesion, and equity. Our member councils are the backbone of FECCA's work, bringing deep, place-based knowledge and strong connections to communities across Australia, and ensuring that national advocacy is informed by lived experience and local realities.

FECCA's policy and advocacy work is further supported by targeted national initiatives that strengthen engagement with specific communities and priority areas, including:

Australian Multicultural Women's Alliance (AMWA) — bringing together the voices and lived experiences of multicultural women. AMWA highlights systemic barriers such as visa insecurity, racism, language and digital exclusion, and challenges in navigating services, with a focus on informing more inclusive policy and program design.

Australian Multicultural Health Collaborative (AMHC) — a national initiative that provides leadership, coordination, and advice on multicultural health, bringing together stakeholders across sectors to improve access and equity, address systemic barriers, and support better health and wellbeing outcomes.

These initiatives operate under FECCA's governance and contribute to its broader mission of advancing inclusion, equity, and participation. All policy positions and submissions are made by FECCA as the national peak body, informed by its members and these engagement mechanisms.

What We Do

For over 40 years, FECCA has worked with its affiliate member Ethnic and Multicultural Communities' Councils (ECCs/MCCs) across the states and territories, and in partnership with multicultural communities, governments and stakeholders, to support a successful, productive and inclusive Australia. FECCA draws on lived experience, community-level evidence and policy expertise to promote inclusive, evidence-based public policy that reflects the realities and contributions of multicultural Australia.

Our work is grounded in the principle that migration and multiculturalism are nation-building, and that inclusive systems — particularly in employment, skills recognition and settlement — are essential to Australia's productivity and long-term economic success and social prosperity.

Foreword

FECCA, welcomes the opportunity to provide this submission to inform the Australian Government's consideration of the *Australia's Humanitarian Program 2026–27 Discussion Paper*. This submission draws on the collective expertise and community insights of FECCA's membership and stakeholders.

Australia's Humanitarian Program remains a critical expression of international responsibility-sharing¹ and a cornerstone of the country's commitment to protection and inclusion. The policy settings under consideration will have significant implications not only for those seeking protection, but also for the communities and systems that support their settlement and long-term participation in Australian society.

This submission focuses on ensuring that the Humanitarian Program remains protection-focused, fair, and sustainable, while also being agile and responsive to emerging trends in migration. It emphasises the need for implementation approaches that are equitable, accessible, and attuned to the realities of culturally and linguistically diverse (CALD) communities. This includes recognising the central role of language access, cultural safety, community connection, and well-resourced settlement systems in achieving successful outcomes.

It reflects the insights of FECCA's member Ethnic and Multicultural Communities' Councils (ECCs/MCCs) and their extensive community networks across Australia. As peak bodies in each state and territory, these councils represent and support a wide range of multicultural community organisations, enabling FECCA to draw on their collective expertise and on-the-ground experience to articulate a national perspective. Their experience captures the realities of accessing protection pathways, navigating complex systems, and rebuilding lives in a new country, and highlights the critical role multicultural organisations and community leaders play in supporting newly arrived humanitarian entrants, facilitating access to services, building trust, and strengthening social cohesion.

FECCA welcomes continued engagement with the Department to ensure that Australia's Humanitarian Program evolves in a way that upholds human rights, strengthens settlement outcomes, and supports a cohesive and inclusive Australian society.

Executive Summary

This submission builds on FECCA's previous submission to the 2025–26 Humanitarian Program and reflects ongoing engagement with multicultural communities, service providers, and stakeholders across Australia.

At a time of record global displacement and increasing pressure on humanitarian systems, Australia's Humanitarian Program must remain **protection-focused, fair, agile, and**

¹ UNHCR (2020). Burden and responsibility sharing. Retrieved April 27, 2026, from <https://globalcompactrefugees.org/sites/default/files/2020-05/GRF%20Fact%20Sheet%20-%20Burden%20and%20Responsibility-Sharing.pdf>

sustainable, while ensuring that settlement systems are adequately resourced to support long-term inclusion and social cohesion.

FECCA's central position is that the key challenge is not only how many people Australia resettles, but **how equitably and effectively the system can adapt to address barriers to access and settlement**, enabling full participation in civic life in Australia.

This submission is informed by:

- FECCA's migration principles²
- FECCA's 2025–26 Humanitarian Program submission³
- ongoing consultations with multicultural communities through FECCA's affiliate member Ethnic and Multicultural Communities' Councils (ECCs/MCCs) across the states and territories
- FECCA's broader policy platform on human rights, anti-racism, and multicultural governance⁴

FECCA's position is that Australia's Humanitarian Program must:

- remain **protection-focused and fair**
- uphold **family unity and human dignity**
- ensure **equitable access and strong settlement outcomes**
- be grounded in **community partnership and lived experience**
- be **agile and responsive to emerging issues**

Key Recommendations

The following recommendations summarise FECCA's position in response to the key questions outlined in the Discussion Paper. They provide a high-level framework to guide the future direction of Australia's Humanitarian Program, drawing on the detailed analysis and evidence presented in the sections that follow.

At their core, these recommendations reflect FECCA's view that the key challenge is not only the scale of the program, but how effectively it is designed and implemented to ensure equitable access, strong settlement outcomes, and meaningful participation in Australian civic

² FECCA (2022). A Fair and Inclusive Society Migration Principles. Retrieved April 7, 2026, from <https://fecca.org.au/wp-content/uploads/2022/12/FECCA-Migration-Principles.pdf>

³ FECCA (2025). Submission to the Australia's Humanitarian Program 2025-2026 Discussion Paper. Retrieved April 7, 2026, from <https://fecca.org.au/updates/submission-to-the-australias-humanitarian-program-2025-2026-discussion-paper/>

⁴ FECCA (2025). Governing for an inclusive and prosperous multicultural Australia. Retrieved April 7, 2026, from https://fecca.org.au/wp-content/uploads/2025/03/FCA_4088_Election_Platform_Report_WEB_FA3.pdf

life. They are grounded in the community insights of FECCA’s membership and stakeholders, alongside policy evidence and the considerations addressed in response to Questions 1–5.

Taken together, they aim to strengthen Australia’s role as a leading resettlement country, underpinned by core humanitarian values and a commitment to human rights, equity, and inclusion, as highlighted below:

- Maintain 20,000 places as a **minimum baseline**, with a pathway to future growth
- Develop a **clear and consistent emergency response mechanism**, including dedicated or flexible visa pathways, to enable timely, equitable responses to emerging international crises
- Preserve a **strong offshore protection focus**, with the Refugee stream as the core component
- Retain a **meaningful Special Humanitarian Program (SHP)** allocation to support family unity
- Remove structural barriers to SHP family sponsorship to **ensure equitable access to family reunion pathways**
- Reform the Community Support Program (CSP) to be **fairer, faster, and genuinely additional**
- Ensure settlement systems are **sustainably funded, culturally responsive, and accessible**
- Embed **language access, system navigation support, cultural safety, and community partnership** as core features of the system
- Recognise and **sustainably fund multicultural and community organisations** as core delivery partners within the humanitarian system
- Strengthen **transparency, data, and accountability**, particularly for CALD communities
- Adopt a **whole-of-government approach** linking humanitarian policy with settlement, social cohesion, and international responsibility-sharing

Australia’s Humanitarian Program must remain anchored in **human rights, anti-racism, and inclusion**, while being responsive to global need and domestic realities.

The following sections provide a detailed response to each of the Discussion Paper questions, expanding on the recommendations above and outlining the evidence, policy rationale, and community perspectives that underpin FECCA’s position.

Background and context

Introduction

In 2026, the global humanitarian landscape is defined by escalating crises, deepening displacement, and a widening gap between need and response. According to the United Nations, over 239 million people worldwide now require urgent humanitarian assistance and protection.⁵ At the same time, forced displacement has reached historic levels, with an estimated 117 million people forcibly displaced globally, including tens of millions of refugees unable to return home due to conflict, persecution, and instability.⁶

This reflects not only the continuation of long-term conflicts but also the emergence of new and compounding crises. Protracted wars, political instability, climate-related disasters, and economic shocks are converging to drive unprecedented levels of displacement. Recent geopolitical developments, including the escalation of conflict in Iran, have reportedly displaced up to 3.2 million people internally, with cascading impacts on already vulnerable refugee populations. These impacts extend beyond immediate humanitarian needs, contributing to global instability through rising energy prices, currency depreciation, and disruptions to supply chains, including fertilisers and food systems.⁷

Despite the scale of need, durable solutions—particularly resettlement—remain extremely limited, with global resettlement places meeting only a fraction of demand. At the same time, humanitarian funding is declining, as traditional donor countries reduce contributions even as needs increase.⁸ Rising operational costs linked to inflation, supply chain disruptions, and energy prices are placing additional strain on already stretched systems. Together, these dynamics are widening the gap between need and response, placing greater responsibility on resettlement countries such as Australia to contribute meaningfully to international protection efforts.

Australia has historically demonstrated the capacity to respond to displacement crises through targeted and scaled intakes. Following the Tiananmen Square protests, approximately 42,000 Chinese students were granted permanent visas, and during the Kosovo War, around 4,000 Kosovar refugees were offered temporary Safe Haven Visas. More recently, the expansion of the humanitarian intake in 2015 demonstrated Australia's ability to scale its response during periods of acute global need.⁹

⁵ United Nations (2026). Crisis and Emergency Response. Retrieved April 7, 2026, from <https://www.un.org/en/global-issues/crisis-and-emergency-response>

⁶ Ibid.

⁷ Council on Foreign Relations (2026). The Iran War is Breaking Global Humanitarian Aid Efforts. CFR, 12 March 2026. Retrieved April 7, 2026, from <https://www.cfr.org/articles/the-iran-war-is-breaking-global-humanitarian-aid-efforts>

⁸ Refugee Council of Australia (2025). LEADING WITH PURPOSE: HOW AUSTRALIA CAN BENEFIT FROM GROWING REFUGEE RESETTLEMENT. Retrieved April 7, 2026, from https://www.refugeecouncil.org.au/wp-content/uploads/2025/08/RCOA-Submission-on-the-Humanitarian-Program-2025-26-Final.pdf?utm_source=chatgpt.com

⁹ Henderson, A. (2015). 'We will give people refuge': Tony Abbott pledges to help Syrian asylum seekers as Labor requests intake boost'. ABC, 7 September. Retrieved April 7, 2026, from <https://www.abc.net.au/news/2015-09-07/tony-abbott-pledges-syrian-refugees-will-get-refuge/6755280>

However, in the current context, Australia's Humanitarian Program is operating under increasing domestic and structural pressure. The Government has committed to maintaining a program of 20,000 places for 2026–27, encompassing both onshore and offshore components.¹⁰ While this provides continuity, it does not align with the scale of global displacement or increasing domestic demand.

The Department's discussion paper highlights that there are now approximately 274,000 applicants on hand, including more than 246,000 offshore applicants, indicating a substantial and growing backlog. Processing times are extensive, in some cases exceeding 3,000 days, contributing to prolonged uncertainty and compounding trauma for applicants.¹¹

At the same time, Australia's settlement infrastructure is under increasing strain. Key pressures include housing shortages and affordability constraints, rising cost-of-living pressures, uneven service availability across regions, and increasing demand for health, mental health, education, and social services.¹²

These dynamics highlight a central issue for the Humanitarian Program: **The challenge is not only the size of the program, but how effectively, equitably, and sustainably the system operates.**

Key Emerging Issues

Current settings suggest a growing imbalance in how Australia responds to displacement. From 2022 to 2023, the primary countries of origin for humanitarian arrivals were Afghanistan (8,045 people), Iraq (2,108), and Myanmar (1,902), reflecting ongoing and protracted crises.¹³ At the same time, the program is experiencing growing pressure from increasing onshore protection claims, while offshore resettlement places remain constrained, resulting in significant and persistent backlogs.¹⁴

This imbalance is contributing to significant backlogs and reduced system responsiveness. Many applicants face waiting periods, reinforcing uncertainty and undermining timely processing expectations. In practice, system bottlenecks and oversubscription have resulted in increased reliance on temporary arrangements, contrary to stated policy objectives.

The impacts of these constraints are not evenly distributed. Delays and limited access to protection pathways disproportionately affect the most marginalised individuals, including

¹⁰ Department of Home Affairs (2026). Discussion Paper: Australia's Humanitarian Program 2026-27. Retrieved April 7, 2026, from <https://www.homeaffairs.gov.au/reports-and-pubs/PDFs/2026-27-humanitarian-program-discussion-paper.pdf>

¹¹ Refugee Council of Australia (2025). Resolving uncertainty: How to address the situation for people without a solution. Retrieved April 7, 2026, from <https://www.refugeecouncil.org.au/wp-content/uploads/2025/04/Resolving-uncertainty-brief-2025.docx.pdf>

¹² FECCA (2025). Governing for an inclusive and prosperous multicultural Australia, p. 14.

¹³ Department of Home Affairs (2023). Australia's Offshore Humanitarian Program 2022-23. Retrieved April 7, 2026, from <https://www.homeaffairs.gov.au/research-and-stats/files/australias-ohp-2022-23.pdf>

¹⁴ Department of Home Affairs (2026). Discussion Paper.

women fleeing gender-based violence, people with severe trauma or mental health conditions, and members of LGBTQIA+ communities. Those without access to legal representation or community support are particularly vulnerable to falling through systemic gaps.¹⁵

At a system level, settlement capacity presents a critical challenge. While Australia has well-established settlement services, these systems are under increasing pressure due to program constraints, delays, and changing intake profiles. Ensuring access to housing, employment, healthcare, and community support remains essential to successful integration, yet without adequate investment, there is a risk that systems may become overstretched.

Consultations with FECCA's affiliate member Ethnic and Multicultural Communities' Councils (ECCs/MCCs) across the states and territories, drawing on their extensive engagement with multicultural communities, highlight persistent structural barriers to access. These include language barriers, limited availability of interpreters, lack of culturally appropriate information, and complex, fragmented service systems. In practice, access is often dependent on informal support networks, particularly multicultural community organisations, which play a critical but often under-recognised role in bridging gaps between individuals and systems.

The Community Support Program (CSP) illustrates both the potential and limitations of current approaches. While designed to expand pathways through private and community sponsorship, the program has become oversubscribed and constrained, with processing times extending up to eight years. The program has paused new applications, and reviews have found that it does not operate as a genuinely additional pathway, instead risking duplication of existing intake.¹⁶

Key Organisation Positions

Against this backdrop, key stakeholders have called for a recalibration of Australia's humanitarian response.

The Refugee Council of Australia has highlighted a global trend of declining resettlement places and humanitarian funding, arguing that Australia must play a stronger leadership role. Central to its position is the need to reorient the Humanitarian Program toward protection needs and align more closely with priorities identified by the United Nations High Commissioner for Refugees. It also advocates for expanding complementary pathways and developing a genuinely additional community sponsorship model.¹⁷

Similarly, Amnesty International Australia has emphasised the urgency of expanding Australia's humanitarian intake and aligning policy settings with human rights obligations. Amnesty

¹⁵ Vitiello, R. (2024). Historic Moment as AAT and Fast Track Finally on the Scrap Heap. Asylum Seeker Resource Centre, May 29. Retrieved April 7, 2026, from <https://asrc.org.au/2024/05/29/historic-moment-as-aat-and-fast-track-finally-on-the-scrap-heap/>

¹⁶ Department of Home Affairs (2019). Investing in Refugees, Investing in Australia: the findings of a Review into Integration, Employment and Settlement Outcomes for Refugees and Humanitarian Entrants in Australia. Retrieved April 7, 2026, from <https://www.homeaffairs.gov.au/reports-and-publications/reviews-and-inquiries/inquiries/review-integration-employment-settlement-outcomes-refugees-humanitarian-entrants>

¹⁷ Refugee Council of Australia (2025). LEADING WITH PURPOSE, p. 3.

recommends increasing the offshore Humanitarian Program to 30,000 places annually and redirecting resources away from offshore processing and detention toward community-based alternatives and durable protection pathways.¹⁸

Amnesty's position is informed by documented concerns regarding offshore processing in Nauru and Papua New Guinea, including prolonged detention, limited access to services, and significant mental health impacts. It argues that these practices are inconsistent with Australia's obligations under the 1951 Refugee Convention.

Additional recommendations include targeted intake quotas for specific populations, such as Rohingya refugees as well as creating 20,000 additional places over four years for Afghan refugees, particularly those at risk of forced return from Iran and Pakistan, reflecting a shift toward more proactive and needs-based planning.

Emerging Policy Directions and Tensions

These perspectives highlight several key policy tensions shaping the current context.

A central tension lies between maintaining a capped program size and responding meaningfully to escalating global need. While fiscal and political considerations influence program settings, there is increasing pressure for Australia to expand its intake and demonstrate leadership in international responsibility-sharing.

Another key tension concerns the balance between onshore and offshore components of the program. The growth in onshore claims risks crowding out resettlement opportunities for offshore refugees, potentially limiting access for the most vulnerable individuals who are unable to reach Australia independently.

There is also ongoing debate regarding the role of community sponsorship and complementary pathways. While these approaches offer potential to expand capacity, their effectiveness depends on whether they operate as genuinely additional pathways rather than substitutes for government-funded resettlement.

Finally, broader questions remain regarding the alignment of Australia's humanitarian and migration policies with its international legal and moral obligations. This includes the use of detention, the outsourcing of protection responsibilities, and the adequacy of settlement support.

Overall, the current humanitarian context is characterised by rising need, constrained resources, and increasing system complexity. For Australia, this presents both a test and an opportunity to recalibrate its Humanitarian Program in a way that is responsive, equitable, and aligned with international commitments, while ensuring that systems are sustainable and capable of delivering meaningful protection and long-term settlement outcomes.

¹⁸ Amnesty International (2026). Submission to the Department of Treasury: 2026-27 Pre-Budget Submissions. Retrieved April 7, 2026, from <https://www.amnesty.org.au/submission-2026-27-pre-budget-submissions/>

Response to Questions

Response to Question 1: Program Composition

FECCA supports a Humanitarian Program that remains firmly **protection-focused**, while also recognising the importance of family unity, community connection, and sustainable settlement outcomes.

Building on the context outlined above, the key issue is not the scale of need itself, but how program settings are structured to respond to it effectively within a constrained system. The United Nations High Commissioner for Refugees (UNHCR) has consistently emphasised that resettlement should prioritise those with the greatest protection needs, including individuals without access to safe or durable solutions in their region of origin.¹⁹

Within a capped program of 20,000 places, FECCA considers it essential that the **Refugee stream remains the backbone of the offshore component**. This stream provides a critical pathway for those with the highest levels of vulnerability, including UNHCR-referred cases, women and girls at risk, and individuals facing acute protection threats. Preserving a strong Refugee allocation is therefore fundamental to maintaining the integrity and purpose of the program.

The **Special Humanitarian Program (SHP)** plays a distinct and equally important role. Evidence from both Australian and international research shows that **family reunion significantly improves settlement outcomes**, including mental health, labour market participation, and long-term integration. Family separation, by contrast, is associated with prolonged trauma, economic hardship, and reduced participation.²⁰ Maintaining a meaningful SHP allocation is therefore not only a humanitarian imperative, but also a key enabler of successful settlement and social cohesion.

The **Community Support Program (CSP)** should continue to operate as a **complementary pathway**, rather than as a substitute for core protection streams. Findings from the Shergold Review and broader policy analysis indicate that, in its current form, the CSP has struggled to operate as an additional pathway and has at times risked displacing places that would otherwise be allocated through the Refugee or SHP streams. A reformed CSP should therefore be carefully calibrated to support, rather than undermine, the broader humanitarian framework.

Taken together, FECCA supports a program composition that includes:

- a **majority Refugee allocation**, reflecting Australia's protection obligations
- a **credible and meaningful SHP allocation**, supporting family unity and community-linked pathways

¹⁹ UNHCR (2025). UNHCR Projected Global RESETTLEMENT NEEDS 2026. Retrieved April 8, 2026, from <https://www.unhcr.org/sites/default/files/2025-06/projected-global-resettlement-needs-2026.pdf>

²⁰ Choumanivong, C., Poole, G. E., & Cooper, A. (2014). Refugee family reunification and mental health in resettlement. *Kotuitui: New Zealand Journal of Social Sciences Online*, 9(2), 89-100.

- a **small, well-designed CSP**, operating as a genuinely complementary mechanism

In addition, FECCA notes ongoing policy discussions regarding the relationship between the onshore and offshore components of the Humanitarian Program. There is merit in considering whether the current numerical link between these components should be revisited. A more distinct approach—where onshore protection operates as a demand-driven system, and offshore resettlement is structured through planned intake—could support a more responsive and equitable framework. The Refugee Council of Australia has long advocated for the **separation of these programs**, with the full quota of places in the existing Humanitarian Program dedicated to offshore resettlement, and the onshore program becoming demand-driven.²¹ This approach could help address processing backlogs, reduce prolonged uncertainty for applicants, and ensure that offshore resettlement places remain focused on those with the greatest protection needs.

At the same time, FECCA notes that a number of key stakeholders have proposed targeted increases in intake to address specific crises. In this context, FECCA sees merit in exploring more structured and consistent mechanisms for responding to emerging international situations. This could include the **development of dedicated or flexible emergency visa pathways**, enabling timely, agile, and equitable responses to crises such as those in Afghanistan, Sudan, and Gaza. A more predictable and transparent framework would support both fairness and public confidence, ensuring that responses are guided by clear principles rather than ad hoc decision-making. This approach reflects a broader shift toward more proactive and needs-based planning within the Humanitarian Program.

Finally, FECCA reiterates that the current program size of 20,000 places should be understood as a baseline, not a ceiling. Rather than viewing program size and composition as separate questions, there is an opportunity to consider how both can evolve together over time. This could include a planned and staged approach to growth, aligned with settlement capacity, system readiness, and emerging international protection priorities.

In this context, future expansion should be guided by clear principles—maintaining a strong protection focus, preserving equity across pathways, and ensuring that any increase in places is matched by adequate investment in settlement systems.

Response to Question 2: SHP Priorities and Sponsorship

FECCA supports a prioritisation framework within the SHP that is **transparent, humane, and grounded in vulnerability, family unity, and equity**.

International evidence and UNHCR guidance consistently highlight that resettlement prioritisation should focus on those facing the greatest risk, including individuals exposed to

²¹ Refugee Council of Australia (2023). Breaking the link between onshore protection and offshore resettlement. Retrieved April 28, 2026, from <https://www.refugeecouncil.org.au/breaking-the-link/>

violence, discrimination, or prolonged displacement. Within this context, FECCA supports prioritising:

- immediate and close family members of people in Australia
- women and girls at risk
- people with disability, including those requiring ongoing support and services, noting the importance of ensuring access to systems such as the NDIS and monitoring any potential impacts of recent changes to eligibility settings
- individuals in protracted displacement situations
- people experiencing compounded disadvantage, including discrimination based on ethnicity, religion, gender, or language
- children without parental care, including orphans from conflict-affected and war-torn contexts
- emergency and urgent protection cases requiring rapid resettlement
- populations affected by major global crises, including those from regions experiencing acute or escalating humanitarian need.

Family reunion is a particularly critical component of this framework. Research demonstrates that **family presence is one of the strongest predictors of successful settlement**, supporting emotional wellbeing, housing stability, employment outcomes, and social participation.²² Conversely, prolonged family separation has well-documented negative impacts on mental health, including increased rates of anxiety, depression, and social isolation.

FECCA also supports maintaining a **broad and inclusive approach to sponsorship eligibility**, including individuals, families, and community organisations. Restricting sponsorship to those with greater financial capacity risks reinforcing inequities and excluding communities that may have strong social support networks but fewer economic resources.

In this context, FECCA notes that significant barriers remain to SHP family sponsorship for refugees who arrived onshore. FECCA's position, as outlined above, emphasises prioritisation grounded in equity and family unity. Currently, refugees who arrived in Australia by boat after 13 August 2012 are entirely ineligible to sponsor family members under the SHP, even where they have become Australian citizens. In addition, SHP applications sponsored by holders of protection visas granted onshore (whether arriving by plane or boat) are deemed the lowest processing priority. These settings make it extremely difficult, and in many cases effectively impossible, for people who sought refugee protection on arrival to Australia to reunite with their family members, unless they are able to access alternative migration pathways that involve significant financial costs, such as Partner visas under the Family Migration Program.

²² Liddell, B. J., Batch, N., Hellyer, S., Bulnes-Diez, M., Kamte, A., Klassen, C., ... & Nickerson, A. (2022). Understanding the effects of being separated from family on refugees in Australia: a qualitative study. *Australian and New Zealand Journal of Public Health*, 46(5), 647-653.

These policy settings are a remnant of the ‘deterrence’ framework that ought to be abandoned, particularly as the government has moved to grant permanency to people who arrived by boat in 2012–2013 and were subjected to the failed ‘Fast Track’ refugee assessment process.²³ This issue has also been raised in advice provided by the Human Rights Law Centre in correspondence with FECCA.²⁴ Addressing these barriers would better align the SHP with its core humanitarian objectives and support more equitable access to family reunion.

At the same time, FECCA recognises the growing role of community sponsorship and complementary pathways in supporting government objectives, including expanding safe and regular pathways, strengthening settlement outcomes, and enhancing community engagement and social cohesion. Evidence from initiatives such as the Community Refugee Integration and Settlement Pilot (CRISP) demonstrates that well-designed models can deliver strong integration outcomes and mobilise significant community capacity to support newcomers.²⁵

Community sponsorship can also contribute to broader system goals, including diversifying settlement locations, supporting workforce participation, and strengthening the social licence for humanitarian migration through direct community involvement.²⁶

Importantly, FECCA does not support a shift toward **greater settlement responsibility being placed on proposers**. Evidence from both Australian and international community sponsorship models shows that while community involvement can enhance settlement outcomes, it cannot replace the role of government-funded services. Over-reliance on proposers risks:

- increasing inequity across communities
- placing undue burden on families and volunteers
- effectively privatising aspects of humanitarian settlement

Rather, **community sponsorship should be understood as a complementary mechanism** that, when well-designed, can expand capacity and strengthen outcomes, provided it operates within a clear partnership framework with government.

Government must therefore retain primary responsibility for ensuring that settlement support is sustainably funded, accessible, and equitable, **while investing in and enabling community sponsorship models that are additional, well-regulated, and aligned with broader humanitarian objectives**.

²³ ASRC (2024). Briefing paper - People failed by Fast Track. Retrieved April 28, 2026, from <https://asrc.org.au/wp-content/uploads/2024/09/Briefing-paper-People-failed-by-Fast-Track.docx.pdf>

²⁴ Human Rights Law Centre, email correspondence with FECCA, April 2026.

²⁵ Community Refugee Sponsorship Australia (2025). How Community Sponsorship Can Support Government Objectives in 2025 and Beyond. Retrieved April 8, 2026, from <https://refugeesponsorship.org.au/wp-content/uploads/2025/06/How-Community-Sponsorship-Can-Support-Government-Objectives-2025-Beyond.pdf>

²⁶ Ibid.

This includes ensuring that sponsorship pathways are genuinely additional to the core humanitarian intake, reducing financial barriers to participation, and providing appropriate support and training to community groups involved in settlement.

Response to Question 3: Settlement Services

FECCA's central position is that **efficiency must not come at the expense of equity**. While timely processing and streamlined systems are important, they must not overlook the human dimension of humanitarian migration. Behind every visa application is a person—often someone who has experienced significant trauma, displacement, and loss. Failing to account for these realities risks creating systems that are efficient in form but inequitable in practice. An approach that balances efficiency with fairness, flexibility, and responsiveness is essential to avoid systemic barriers and ensure that those most in need are able to access protection and rebuild their lives with dignity.

Evidence from settlement research consistently shows that **early access to appropriate support is critical to long-term outcomes**, including employment, health, and social participation.²⁷ Reducing or poorly targeting settlement services may produce short-term cost savings, but leads to higher long-term costs through poorer integration outcomes.²⁸

In practice, FECCA's engagement with its member organisations and stakeholders consistently highlights the real impacts of **insufficient or delayed settlement support, particularly in the early stages following arrival**. These include unmet basic needs, difficulties navigating services, and increased vulnerability to social and economic exclusion. In some cases, a lack of appropriate support can contribute to longer-term challenges, including disengagement from education and employment systems and, in more severe instances, contact with the criminal justice system.

In this context, it is important to recognise that settlement outcomes are directly linked to the level and timing of investment. While the Discussion Paper refers to a 'context of finite resources', there is merit in considering how existing funding is allocated across the broader migration and protection system. A more balanced approach—**prioritising early settlement support and reducing reliance on high-cost deterrence measures**—would strengthen both humanitarian outcomes and long-term social and economic participation.

A key priority is ensuring that support is **targeted to those with the greatest need**, including people with disability, survivors of trauma, individuals with low English proficiency, and those facing structural barriers to participation.

²⁷ Cheng, Z., Wang, B., Jiang, Z., Taksa, L., & Tani, M. (2021). English skills and early labour market integration: Evidence from humanitarian migrants in Australia. *International Migration*

²⁸ Settlement Council of Australia (2024). Estimating the impact of the Australian settlement sector – Initial findings from the literature. Retrieved April 8, 2026, from <https://scoa.org.au/wp-content/uploads/2024/05/DAE-SCOA-LiteratureFindings-FINAL.pdf>

Language access is a particularly critical issue. Research across multiple sectors, including health and social services, demonstrates that **limited English proficiency is one of the strongest predictors of reduced access to services**.²⁹ However, language proficiency alone does not guarantee access. We consistently hear that limited understanding of Australia's support systems and essential services remains a significant barrier, even for those with some level of English.

Without systematic language support — including interpreters, translated information, and culturally appropriate communication — alongside efforts to support the enculturation and navigation of Australia's systems (such as education, welfare, and health), individuals are less likely to engage with services, more likely to experience poor outcomes, and more likely to rely on informal and potentially inadequate support networks.

FECCA therefore emphasises that language access, alongside support to navigate and understand Australia's systems, must be treated as **core service infrastructure**, rather than optional add-ons.

In addition, there is strong evidence supporting the role of **bicultural workers and community-led navigation models**. These approaches improve trust, enhance service uptake, and support more effective engagement, particularly for newly arrived communities. As highlighted in FECCA consultations, many individuals rely on informal community networks to navigate systems, indicating a gap in formal service design.

Settlement services must also be **place-based and responsive to local conditions**.³⁰ Regional and rural areas often face service scarcity, limited housing, and reduced access to specialised support. A uniform funding model cannot address these disparities effectively.

Finally, there is a need for stronger **data, transparency, and accountability**, particularly in relation to CALD communities. Disaggregated data on service access, outcomes, and barriers is essential to identifying inequities, informing targeted and tailored interventions, and strengthening evidence-based policy responses.³¹

Response to Question 4: Community Support Program (CSP)

FECCA agrees that the CSP requires **significant reform**.

Current evidence indicates that the program is:

²⁹ FECCA (2025). Pre-Budget Submission 2026–2027: Investing in Communities for a Fair, Inclusive and Productive Multi cultural Australia. Retrieved April 8, 2026, from <https://fecca.org.au/updates/pre-budget-submission-2026-2027/>

³⁰ AHURI (2022). Understanding the lived experience and benefits of regional cities. Retrieved April 8, 2026, from <https://www.ahuri.edu.au/sites/default/files/documents/2022-05/AHURI-Final-Report-377-Understanding-the-lived-experience-and-benefits-of-regional-cities.pdf>

³¹ FECCA (2020). IF WE DON'T COUNT IT... IT DOESN'T COUNT! Towards Consistent National Data Collection and Reporting on Cultural, Ethnic and Linguistic Diversity. Retrieved April 8, 2026, from <https://fecca.org.au/updates/if-we-dont-count-it-it-doesnt-count-2/>

- heavily oversubscribed and associated with long processing delays³²
- financially inaccessible for many applicants and sponsors
- not functioning as a genuinely additional pathway

As noted in policy reviews, including the Shergold Review, the CSP has not consistently met its original objective of expanding resettlement capacity, and in some cases risks duplicating or displacing existing humanitarian pathways.

A redesigned CSP should be guided by principles of **fairness, accessibility, and complementarity**. It should:

- operate alongside, not instead of, core humanitarian streams
- significantly reduce financial barriers and improve accessibility
- introduce more flexible, sustainable, and accessible funding arrangements, such as community-based or pooled sponsorship models
- significantly shorten processing times
- support a broader range of applicants, rather than focusing narrowly on “job-ready” individuals
- ensure that cost does not become a proxy for eligibility

The current cost structure of the CSP presents a significant barrier to equitable access. The combination of visa application charges, administrative fees, financial assurance requirements, and upfront settlement costs places the program out of reach for many individuals, families, and community organisations.³³ This creates a risk that access to the program becomes determined by financial capacity rather than protection needs, family connections, or community support. In this context, the CSP risks functioning less as a humanitarian pathway and more as a market-based mechanism.

In terms of applicant attributes, a redesigned CSP should prioritise individuals and families based on vulnerability, family connections, and capacity for long-term settlement, rather than narrow economic criteria. This includes people with strong community or family links in Australia, those facing heightened protection risks, and individuals who may benefit from community-based support to rebuild their lives.

While employment pathways can support integration, international evidence shows that successful settlement depends on a broader set of enabling conditions, including access to education, stable housing, social networks, and meaningful participation in community life. These factors highlight the importance of a whole-of-community approach, particularly in rural and regional areas, where local engagement and support structures play a critical role in

³² Department of Home Affairs (2025). Community Support Program (CSP). Retrieved April 8, 2026, from <https://immi.homeaffairs.gov.au/what-we-do/refugee-and-humanitarian-program/community-support-program>

³³ Vogl, A. (2025). The Expansion of Community Refugee Sponsorship: Principles for Sustainability and Australia’s Community Support Program in Review. *Refugee Survey Quarterly*, 44(4), 524-545.

shaping settlement outcomes.³⁴ Evidence from these contexts shows that positive outcomes are driven by strong community engagement, local leadership, and inclusive environments that enable newcomers to build sustained relationships and a sense of belonging.

A balanced approach to applicant selection would therefore better align the CSP with its humanitarian purpose while still supporting positive settlement outcomes. FECCA does not support a model that prioritises applicants primarily on the basis of economic capacity or immediate labour market readiness, as this risks undermining the humanitarian purpose of the program.

International evidence suggests that successful community sponsorship models are those that:

- operate in partnership with government
- include strong regulatory oversight
- are integrated with formal settlement services
- recognise diverse pathways to integration, including education, care roles, and community participation

A reformed CSP should therefore adopt a partnership-based delivery model, ensuring that community involvement enhances, rather than replaces, formal support structures. This collaborative approach would support stronger settlement outcomes, maintain the integrity and intent of Australia's humanitarian program, and help identify and mitigate emerging risks.

Response to Question 5: Broader Reforms

FECCA supports a broader reform agenda to ensure the Humanitarian Program remains **fair, effective, sustainable, and aligned with Australia's international obligations**.

First, it is essential to maintain a **rights-based approach to protection**, consistent with Australia's commitments under the 1951 Refugee Convention and its 1967 Protocol. Policy settings must prioritise fairness, due process, and protection outcomes, rather than deterrence-based approaches, including reconsidering policies that externalise protection responsibilities or rely on offshore processing arrangements, where there are ongoing concerns regarding compliance with international law and human rights standards. Access to timely and transparent decision-making processes, procedural fairness, and safeguards against policies that may undermine protection obligations or shift focus away from those most in need are critical to maintaining system integrity.

Second, there is a need to address **prolonged visa insecurity**, which has been shown to negatively impact mental health, employment, and social participation. Temporary and uncertain visa arrangements can create long-term instability for individuals and families, limiting

³⁴ Radford, D., Tan, G., Hetz, H., Krivokapic-Skoko, B., & Hassani, A. (2025). A whole-of-community approach: local community responses to refugee settlement–integration in rural Australia. *Australian Geographer*, 56(1), 83-103.

their ability to plan, invest in education or employment, and fully engage in community life. Providing pathways to permanency is critical to enabling long-term integration and cohesion.

Third, complementary pathways — including labour mobility and education pathways — should be expanded where they are **ethical, accessible, and genuinely additional**, rather than substituting core protection pathways. These pathways can provide important opportunities for safe and regular migration; however, they must be designed to avoid privileging those with greater economic or educational capital at the expense of individuals with higher protection needs. Clear safeguards are required to ensure that complementary pathways enhance, rather than dilute, the integrity and intent of the Humanitarian Program.

Fourth, there is a need to embed **anti-racism and cultural responsiveness** across humanitarian and settlement systems. Evidence from national frameworks and research highlights the ongoing impact of systemic racism and discrimination on access to services, employment opportunities, and broader participation outcomes.³⁵ Addressing these barriers requires more than policy commitments—it necessitates targeted investment in culturally responsive service delivery, workforce capability, community-led initiatives, and accountability mechanisms to monitor and respond to inequities.

Fifth, FECCA strongly supports a **whole-of-government approach**, linking humanitarian resettlement with:

- settlement policy
- social cohesion strategies
- development aid
- international diplomacy

A coordinated approach is essential to ensure that Australia's domestic policies are consistent with its international commitments, and that settlement outcomes are supported through integrated and forward-looking policy design.

Finally, FECCA emphasises the need to invest in **community infrastructure**. Multicultural and community organisations play a critical role in:

- building trust
- facilitating access to services
- supporting system navigation
- strengthening social cohesion and participation

These organisations are often the first point of contact for newly arrived individuals and provide culturally safe and trusted spaces that enable engagement with services and institutions.

³⁵ Commonwealth of Australia (2024). Towards fairness: A multicultural Australia for all. Retrieved April 8, 2026, from <https://www.homeaffairs.gov.au/multicultural-framework-review/Documents/report-summary/multicultural-framework-review-report-english.pdf>

Despite this, they are frequently under-resourced and engaged in ad hoc ways. A more sustainable and effective approach would recognise and fund community organisations as essential partners in program design and delivery, embedding them within the broader humanitarian and settlement ecosystem rather than positioning them as peripheral actors.

Conclusion

Australia's Humanitarian Program sits at the intersection of global responsibility and domestic system capacity. In a context of unprecedented global displacement, increasing geopolitical instability, and mounting pressure on humanitarian systems, maintaining current policy settings is unlikely to deliver outcomes that are either equitable or sustainable. As this submission has outlined, **the key challenge is not only the scale of the program, but how effectively it enables access to protection, supports timely processing, and delivers meaningful and positive long-term settlement outcomes.**

The evidence presented throughout this submission demonstrates that Australia's Humanitarian Program is operating within a system under strain. Growing backlogs, prolonged processing times, and increasing demand are intersecting with pressures on housing, services, and community infrastructure. These dynamics are not isolated issues; they are interconnected and cumulative. Without deliberate and coordinated reform, there is a real risk that the system will continue to reproduce inequities, prolong uncertainty for applicants, and weaken both settlement outcomes and social cohesion.

This includes ensuring that policy settings do not inadvertently create structural barriers to access, that protection responsibilities are not externalised in ways that undermine human rights obligations, and that investment across the system is aligned with long-term settlement and participation outcomes.

A central theme emerging from this submission is that the effectiveness of the Humanitarian Program depends on how well its different components integrate and align to function together. Program composition, access pathways, settlement services, and community support structures must be understood as part of a single, integrated ecosystem. Policy decisions in one area inevitably shape outcomes in another. For example, delays in processing not only affect applicants but also increase pressure on settlement systems; similarly, insufficient investment in settlement services undermines the long-term benefits of humanitarian intake. A system-wide perspective is therefore essential.

Critically, the effectiveness of these reforms depends on recognising and strengthening the role of **multicultural and community organisations as essential system partners.**

As outlined throughout this submission, organisations such as FECCA, its affiliate member organisations across all states and territories, and its stakeholders within the broader multicultural sector play a unique and indispensable role in:

- **bridging the gap between policy and lived experience**
- supporting individuals to **navigate complex systems**

- providing **trusted, culturally safe entry points** into services
- and strengthening **community connection, participation, and social cohesion**

In many cases, these organisations are not supplementary to the system — rather, they function as “**government arms**” in practice, forming an integral part of how the system operates. They play a critical role as trusted intermediaries between communities and services, particularly for individuals facing language barriers, low system literacy, or limited trust in formal institutions.

However, this role remains under-recognised and under-resourced. A sustainable and effective Humanitarian Program must therefore move beyond viewing community organisations as stakeholders, and instead recognise them as **core delivery partners**, requiring stable funding, meaningful engagement, and inclusion in policy design and implementation.

Ultimately, Australia’s Humanitarian Program must continue to reflect the country’s commitment to **human rights, fairness, equity, and inclusion**, while adapting to evolving global and domestic pressures—recognising the need for fair processes alongside equitable outcomes.

A cohesive and inclusive Australia is not achieved through policy intent alone. It is built through systems that are accessible, equitable, and grounded in lived experience — systems that can work for everyone, in practice, not just in principle.

FECCA looks forward to continuing to work in partnership with the Australian Government to ensure that the Humanitarian Program remains responsive and effective, and supports participation in Australia’s civic life and shared values.



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