



13<sup>th</sup> December 2012

## **SCOA Submission on Integrated Service Delivery Framework**

SCOA represents a broad network of nearly 80 settlement agencies around Australia. SCOA's consultation with members and our research into the area have informed the preparation of this submission on the proposed Integrated Service Delivery Framework (ISDF). The ISDF represents an important development in the service delivery framework for asylum seekers living in the community on bridging visas.

### Executive Summary:

SCOA's consultation on the ISDF highlighted the settlement sector's concern that work rights are not included within the current provisions for bridging visa holders. The settlement sector has many questions about the development of the ISDF as a model, and in particular the need for strong links from the ISDF to the settlement sector for those who receive a permanent visa.

The settlement sector is aware that the ISDF will be supporting a client group which have a high range of needs and particular vulnerabilities related to the nature of their 'pending' visa resolution status. The complexities of this necessitates a strong communication campaign surrounding entitlements and services within the ISDF to mitigate any potential confusion.

Consistency of service standards between programs such as the ISDF and HSS, and clarity of information about programs will ease transition issues, both for the start of the ISDF and for clients exiting out of the ISDF with successful visa outcomes.

In SCOA's submission detailed attention is given to the policy parameters of the ISDF from the perspective of the client cohort and the specifics of service delivery. The issues surrounding client vulnerability, and equipping the ISDF to provide the necessary support will require careful consideration. Successful implantation and transition will be supported by a change management approach which includes the establishment of clear communication protocols and pathways with all involved parties and the community.

The submission also puts forward suggestions on client support needs based on the settlement sector's experience in supporting clients post resolution of their visa status. Family reunion is a key priority for clients. Re-learning their environment through the lens of a permanent visa, and the wider access to services, is a settlement focus for clients in this situation.

The importance of clear referral pathways has been highlighted in the experience of the settlement sector, and is a relevant factor to consider in the development of the ISDF.

In our consultation on the ISDF consistent themes emerged:

- Clarity of information on the ISDF, visa conditions and associated service eligibilities is vital. The area has been the subject of much change and intense political debate which has resulted in confusion for service providers, communities and clients in relation to conditions and proposed service delivery arrangements in particular.
- Concern about the impact of the lack of work rights for bridging visa holders who arrived post 13<sup>th</sup> August. The settlement sector is concerned about the potential for an underclass to develop, the negative impact of being unable to be productive and contribute to society, and for people to be pushed into exploitative situations. These concerns relate to and amplify the concerns held for what is already well acknowledged as a particularly vulnerable group of people. Community support for clients may be impacted as they may be perceived as not contributing to society by choice rather than as a condition of their visa.
- The need for strong integration with settlement services for those who are ultimately successful in obtaining a permanent visa. As the model stands it is internally integrated, but lacks integration with services upon exit from the program.

#### **Implementation issues & challenges:**

The examination of potential ISDF implementation issues and challenges was undertaken from the perspective of the clients and the range of needs and vulnerabilities they may present, and in relation to service delivery issues which may arise in implementing the ISDF.

The range of issues and challenges presented by this cohort of clients includes:

- Increased complexity on a range of fronts, including visa type and eligibility for services. Client's existing vulnerability and trauma related to their experiences in fleeing and seeking asylum will be exacerbated by limited access to services and support.
- The impact of lack of work rights on client well-being and capacity to contribute to their own support will be far reaching, affecting clients adversely, and impinging on community attitudes to clients. The potential for an underclass of people to develop living in institutionalised poverty has been raised as a concern.
- The detrimental impact on clients of the focus by the community and politicians in an environment with ongoing debate about asylum seekers and the discussion of deterrence frameworks
- Many clients in this group are isolated from their family, and as such experience additional psychological pressures, and thus family reunion is a priority. Family reunion is not possible while refugee status determination is in progress, and can be significantly delayed upon resolution of status. This is a significant factor which can affect client mental health and wellbeing, particularly in light of the length of processing time.

There are a range of service delivery issues presented by the ISDF, which include:

- Confused and blurry lines with other cohorts regarding eligibility of services

- A lack of referral pathway options to other services, which in turn creates a stronger need for a one stop shop, and thus necessitates some possible duplication of services
- The intersection between federally funded services, state government services and the settlement framework may complicate service delivery.
- The benefit of strong connection to settlement services for those that get permanent visas, integration needs to continue beyond the ISDF framework itself. The model could be improved through making explicit the connections to settlement (where appropriate), including referral pathways and warm handovers of clients.
- Service delivery principles in an environment of deterrence where there may be not much choice for clients, where client empowerment is constrained by their visa conditions.
- Agencies may find the ISDF poses constraints and ethical dilemmas in providing services within a framework which includes conditions which contradict agency mandates or principles
- The ISDF includes a wide variety of services and client groups. Agencies will need to develop comprehensive service delivery models for each group to cover their unique needs.
- The restrictions experienced by this group of clients will put added pressure on community services provided by NGOs given that clients will have limited access to mainstream services.
- It is recommended that the ISDF include a nuanced and comprehensive approach to case management to support clients through what is a complex process

#### **Successful implementation and transition:**

Consultations on ideas to support successful implementation and transition to an ISDF included the recommendation that a change management approach be taken, particularly during the start of the program, with the focus on clear information to all involved (clients, community and service providers).

Experience from previous programs also highlights the importance of clear communication between DIAC and service providers on referrals, including numbers and accurate information about clients.

Consistency of service standards and access to support, for example in relation to standards of accommodation, will also contribute to the success of the ISDF. Current experience is that there can be different standards of accommodation between Community Detention and the Humanitarian Settlement Services. While client's conditions and eligibility upon receipt of permanent visas are not yet clear, this is an area of consideration to support consistent client outcomes and expectations.

#### **Client support post resolution of status:**

In addition to the questions raised in the call for submissions from DIAC SCOA sought input from the settlement sector on their experiences and issues which have arisen for clients who have been granted a permanent visa within Australia. While it is acknowledged that these issues will not be universal, awareness of them may support the development of the ISDF and the interconnections of the ISDF with settlement for those that achieve permanent visas.

A consistent and urgent need for all granted permanent visas is for family reunion, this is important in itself, and supports client transition from insecurity to security. Clients who gain permanent visas are in an environment where they need to re-learn their environment and related services as a permanent resident, given that their access to services will have increased considerably, and include services that were previously barred due to visa conditions.

**Integrating referral pathways between services and programs:**

The settlement sector has experience in coordination of referral pathways between services and programs, given the range of agencies settlement workers regularly connect with. This experience may also be useful for the ISDF. Referral pathways are strengthened when there is clarity of information and responsibility, and funding for coordination, relationship building and communication pathways. The absence of clarity of responsibility can result in clients and services being get shuffled between agencies and programs, resulting in service gaps and cracks.