1ST March 2012

Access and Equity Inquiry Secretariat
Multicultural Policy Section
DIAC
PO Box 25
Belconnen ACT 2616

Dear Secretariat,

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Re: Submission to the Access and Equity Inquiry

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The Settlement Council of Australia (SCOA) is pleased to provide this submission into the Access and Equity Inquiry. SCOA represents the broad network of nearly 70 settlement agencies around Australia. As advocates and service providers, the sector has a unique knowledge of the realities of the settlement experience, over time, across the country, and among hundreds of different ethno-cultural communities.

SCOA's submission is informed by recent member consultation across Australia which highlights the issues newly arrived communities are facing in relation to accessing services, understanding the concepts of 'access and equity' and receiving equitable treatment in the community.

Key issues covered in this submission are:

- Community understanding of the terms 'access and equity'
- How access and equity is measured, including data collection on access and equity and accountability in relation to access and equity
- Variability in how access and equity is implemented (and understood) across different government departments and geographic locations
- The need to provide training and capacity development in the area of access and equity for the community and front line staff

Concepts of 'access' and 'equity'

Understanding and communicating the concepts of access and equity to community members was an issue which clearly emerged in consultations. It was generally agreed that while the underpinning concepts are understood by all, the language used is currently weighted towards bureaucracy and government.   Simpler, plain English, language would be useful to communicate the concepts to all, including newly arrived and newly emerging communities.   Multilingual resources are also very important.

Clarity of access and equity from concept to implementation was also raised as an issue, whereby high level policy language around access and equity did not always translate to accessible services at the shop-front level. Member agencies reported clients needing to be supported by a worker to access certain services where language barriers limited access, creating the need for an 'advocate' in some situations. This points to a disconnect between policy and program delivery in terms of access and equity.

Greater education, in particular an education campaign, would assist in this area. The education campaign would need to be multifaceted, targeting community members and service providers. A better understanding of rights and responsibilities on both sides of the service equation would improve access and equity outcomes. Members commented that a previous education campaign (in the 80's and 90's) was quite successful, and contributed to long term increased understanding of rights and responsibilities in relation to access and equity.

Members commented that due to lack of capacity development for communities which explicitly supports access and equity agencies can be put in situations where they are speaking 'for' clients, rather than supporting clients to speak for themselves. Agencies work hard to build up client capacity, with empowerment and independence as a key focus.

Authority for Access and Equity

Within the member discussions on the issue it was generally agreed that the authority for access and equity was clear, however it could be strengthened in some areas (see also comments below in relation to strategy, framework and alignment). It is important that access and equity is translated into concrete improvements at a service level. Undertaking this work is the responsibility of all, which would be supported by a clearer focus on access and equity at all levels of government.

Agencies also acknowledged the need for their own services to reflect access and equity principles. This occurs as services and programs are developed, with the orientation to multilingual and multicultural access providing a natural access and equity framework. The issue of intersectional barriers to access (such as disability and gender for example) is one which may need special consideration.

Ensuring access and equity is embedded in all government program guidelines would contribute to improvements, for example programs which target particular demographics (such as youth or the elderly) need to ensure that they include references to (and positive policies about) diversity access to services.

Access and Equity Strategy and Framework

Careful consideration of policy as programs are designed and implemented is crucial to support access and equity for clients from all backgrounds. Training and awareness raising is also important, in particular for frontline staff, to ensure that policy principles are informing daily practice. Diversity in staff composition would also contribute to stronger outcomes in access and equity. As mentioned

above there is a need to ground access and equity language and policy into the sphere of practice, which ties into this issue of macro strategies and frameworks also.

Core services definitely need to be supported to ensure they comply with access and equity policies, in particular in regional areas, where there may be less knowledge and understanding of diversity at a service delivery level. That said we advocate for a whole of government approach where any agency, and any office, can provide full service to anyone in the community.

Performance standards and accountability measures, discussed in greater depth below, would also assist in this area.

Alignment with other Australian Government policies

Access and equity is reasonably well aligned with other government policies, however as mentioned above, stronger links in terms of implementation would strengthen outcomes.

Alignment of access and equity to general government discourse is also important. The ongoing discussions in the public arena about asylum seekers are having an impact on community perceptions, which in turn has a negative impact on access and equity.

Service Delivery, Contracts and Contract Management

Members reported that generally service delivery contracts included access and equity provisions. There was a lack of interpretation and guidelines in relation to implementation of these provisions, where it has been largely left up to the individual agency to develop and implement their own access and equity policy and practice. Agencies are comfortable doing this, however in the event of a larger community education campaign, as advocated for above, it is an area that could be usefully included in discussion and dialogue with the settlement sector. The settlement sector has a great deal of expertise in this area, in terms of service delivery, and in terms of understanding the barriers clients from diverse backgrounds face.

Service delivery is also an area where diversity of workforce within the public service sector, as evident in the settlement sector, would support access and equity. Diversity needs to be reflected at a range of levels within the public service sector, from frontline to senior management, to have the most impact on policy and service development and implementation. Again, one of the main issues here is the translation of high level policy language into successful practice at the service delivery level.

Standards/performance measures

Clear standards and performance measures are vital. A common understanding of performance measures and their implementation is needed in this area. Strengthening access and equity through clear standards would enable agencies to better support their clients in turn. A shared language

around standards between government agencies and the community would facilitate improved accountability.

Settlement agencies appreciated the data they are currently provided with, however disaggregated data on access trends and emerging issues would be very useful to help refine program delivery and resolve access issues as they emerge.   It was noted that it is important that data collection processes and methodologies truly reflect the diversity of the community. A generic 'culturally and linguistically diverse' category is not in itself very useful, and actually may function to blur important differences between groups. It is recognised also that data collection in this area can rapidly become a very complex process.   Data which will be useful to assess success in access and equity can also be found in collating information on who is involved in decision making in communities. As mentioned above diversity in the workforce is one key area, which needs to be matched by diversity in boards and committees.

Access and Equity Report

Reporting is important, contributing to transparency, accountability and understanding of the concepts of access and equity. Connected to the discussion around standards and measures, clear reporting can measure improvements, highlight areas which need greater focus, and focus attention on the issue more generally.

Showcasing best practice is often a good way to share program ideas and strengthen good practice however it is felt reporting should also include practical measurements, as commented on in the section above.

Focus of access and equity reporting

It may be appropriate to focus reporting on a theme, as a way of gradually building on understanding of relevant concepts within access and equity, however this should not be at the expense of the core reporting framework.

Location of Access and Equity Policy and Reporting Responsibility

Discussion on the location of access and equity responsibility within the government centred on ensuring that there is sufficient support for access and equity within the full range of government departments and agencies. It was felt in some states that the state government agency responsible for access and equity did not have the power or authority needed to push through the changes needed at the service delivery level. In these cases access and equity was promoted through trying to 'influence' change, a fairly weak position.   As a whole of government approach, and to ensure that access and equity is supported in implementation as well as policy the Prime Minister and Cabinet, or for states the Premier and Cabinet, could be a useful government location for access and equity policy and reporting. Strong links to the Department of Immigration would need to be maintained, given the historical expertise and connections to the settlement sector.

SCOA is pleased to put forward these comments based on member input to the inquiry. Ensuring access and equity is strengthened is very important to the settlement sector and the clients we support.

Please feel free to contact me should you require clarification or further information on any of the points raised.

Yours sincerely,

Sky de Jersey
Executive Officer

CC: Senator Kate Lundy, Parliamentary Secretary for Immigration and Multicultural Affairs
CC: Karina Sommers, Director, CSM Research, Evaluation and Planning, Settlement Branch