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cc: Cedric Manen  
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**re: comments on the Department of Immigration and Citizenship (Diac's) paper on the directions for the Settlement Grants Program (SGP) 2011-12**

The following comments refer to the position of the Settlement Council of Australia (SCoA) regarding Diac's paper on the SGP; this paper was discussed in detail by members of the SCoA board during the week commencing 8 November and many of the comments below reflect these discussions and were subsequently amended and cleared by executive members.

SCoA members were very positive about the SGP paper and recognized the department has made a genuine and strong attempt to reflect the views which have been expressed in past consultations into the document. SCoA is therefore keen to acknowledge that this represents important progress and notes, at the outset, that Australia does continue to provide a high quality settlement program that is well-regarded by international standards; the department is commended for its continuing efforts to maintain this excellent reputation.

The broad division, which is outlined in the paper, into the two service types of orientation and participation in Australian society is considered viable by SCoA. Please note that the use of the word "integration" is not always viewed favorably among community advocates and the department may wish to refer to "inclusion" which aligns the language with the government's broader social inclusion framework. The recommendation that service providers are funded for at least three years is particularly welcome and will help end – for both the department and service providers - onerous grant applications on an annual basis. The funding of ethno-specific organizations is also good news and the one to two year grants appear, generally speaking, fair.

SCoA members, however, did express some concern that definitions in the paper were occasionally vague and should be more clearly explained, such as "an integrated service hub", and "settlement" itself which is still somewhat vague and poorly integrated with other social policy frameworks. Also, the paper includes some sweeping statements which – if generalized and applied – may not work as the department intends. For example, collapsing MRCs to concentrate resources, skills, capacity etc may have some positive benefits but, if this involves an overall shrinking of the pool of available resources (on the justification that economies of scale may involve efficiency savings) then this could be detrimental: it is not a viable trade off.

The five year period after which time it is considered viable to phase out SGP funds for new and emerging communities' settlement also risks being a simplistic formula even if it is accepted that it may be appropriate for the majority of circumstances. Complex cases, low infrastructure groups, communities struggling in high socio-

economic need geographical locations (which is not uncommon given their own limited financial resources and degree of agency) may require assistance somewhat beyond these time limits.

SCoA members support SGP funds for specialist housing services. While it is sensible these are for clearly identified or defined regions, SCoA is concerned there needs to be some services and resources available at the national level for a number of reasons (such as to address community mobility), furthermore, it is unclear how these services will be selected and the conditions under which SGP recipients will work with them; this leaves the arrangements open to confusion or exploitation. Information sessions for clients are also insufficient to address need and more practical assistance is often required.

SCoA members are committed to work with members of small communities, including many of the ethno-specific organisations funded to support low capacity, establishing new communities. It was noted that where such groups/individuals are being mentored they should be allowed to participate in DLaC training programs (such as organizational governance training). Unfortunately this is not offered across all of Australia, for example, our Western Australian board member has advised this is rarely available in his state, for purposes of both equity and outcomes the department may wish to review this issue. While recognizing the role of migration agents, SCoA members note they already provide migration advice for many of their clients. Some of the boundaries between who and how this is available may be restrictive, in this circumstance SCoA would like to see some immigration assistance funding also incorporated into SGP processes in the future.

There are a number of additional points made in the paper which are minor but nevertheless worthy of identifying for reasons of clarity. These include:

- 2(b) “the development of life skills” - this phrase is ambiguous; it would be clearer to state that the intention is to help build those (such as social, cultural and economic) skills in individuals which are more generally relevant to the Australian context
- 2(d) it would be positive to see DLaC working (including with SCoA) to encourage other Commonwealth agencies to accept a greater degree of responsibility to support continued ‘transitional’ programs for CLDB clients beyond the 5 years SGP period (for example, such as Multicultural Mental Health Australia funded by the Department of Health and Ageing)
- 2(e) while SCoA recognizes this is outside its broad areas of interest, nevertheless, it is concerned the views expressed regarding temporary entrants are unclear. There are, among others, significant equity, duty of care and international trade issues here that may impact significantly upon Australia’s national interests – I am happy to elaborate elsewhere
- page 3: the paragraph under the three types of services is confusing, rewording may help to better define the differences and overlap risks
- page 4: under the heading “orientation to Australia”, as well as these aims the department may wish to add the further goal of improving the understanding of rights and responsibilities amongst recipients of settlement services. In the paragraph headed “participation in Australia society”, could a different term to “mainstream Australia” be found? Again, this is not defined and an alternative is needed, it is a contentious phrase used elsewhere in the paper as well
- page 6: while the notion of supporting ethno-specific organisations is fine in principle, it should be acknowledged this is not always straightforward. Communities establishing from regions of endemic conflict based on religious, tribal, racial, political or other differences may appear collectively identifiable to those from *outside* the conflict. This may have the effect of fuelling tensions within the communities in Australia, or excluding some due to apprehensions about certain dominant groups or individuals, this may have unintended negative consequences the department will wish to avoid
- page 6: fifth paragraph – a number of SCoA board members were confused by reference to “...providing social **and other** support to new and emerging communities...” and have asked that the nature of this other support be explained in the next iteration of the paper
- the four dot points (pages 6-7) also raise a number of questions, such as: how are the partnerships to be formalized, funded and reported? How are leaders to be brought together to workshop issues? (this is a resource intensive process with obvious consequences) and why is it always the responsibility of

the excluded, low-capacity and vulnerable to educate, empower and motivate the dominant groups in a social contract? It is recommended these points are reworded to clarify some of these issues

- page 7: service delivery models – SCoA members agree that such models are important and the notion of a 'hub' of co-related services and resources is helpful for all those involved (many MRCs already do so); nevertheless, SCoA would like to see this notion explained further, there was concern that issues such as physical accommodation (which may not always be available) needs to be recognized and flexibility may be needed in interpreting and delivering on such models
- page 7, second last paragraph: while "language and trust" may be a barrier to service providers this continues to be ambiguous. Other barriers are significant such as culture, religion, ethnicity/clan, race and socio-economic disparity (although they could all be variously clustered under the "trust" category, this statement infers the primary factor is linguistic)

I hope these comments are helpful; SCoA recognizes that a number of the issues raised can be elaborated further in the context of forthcoming consultations around the Settlement Framework. If the Department requires any clarification please direct questions to: [eo@scoa.org.au](mailto:eo@scoa.org.au), or leave a message on (02) 8065 5225. I apologise this document is being lodged one working day late, SCoA's annual general meeting coincided with the submission date, hence the delay.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Gershevitch', with a horizontal line underneath.

Conrad Gershevitch  
Executive Officer, Settlement Council of Australia  
15 November 2010