



28 January 2011

The Hon Kate Ellis MP
Minister for Employment Participation and Child Care
Locked Bag 8756
Canberra ACT 2601

cc: Cedric Manen (Chair, SCoA)

Dear Minister

re: submission regarding recommendations on employment service improvements within Job Services Australia (JSA) and the Disability Employment Service (DES) for recent humanitarian entrant arrivals to Australia

I write in response to your letter of 9 December 2010 requesting a submission on how employment services within Job Services Australia (JSA) and the Disability Employment Service (DES) can be improved after the current contract period expires at the end of June 2011. As executive officer of the Settlement Council of Australia (SCoA), the national peak body representing settlement services, our submission primarily focuses on issues relating to the needs of culturally and linguistically diverse (CaLD) background clients, both migrant and humanitarian entrant.

Thank you for the short extension to prepare this submission. It has been difficult to gain advice from all our membership due to the timing although, amongst the input, we have been able to garner feedback from two members (ACCESS and Diversitat) who are JSA providers as well as the MRC in Southern Tasmania which is a recipient of DEEWR innovation funding to work with CaLD communities. Such requests, made in December or for a January deadline, are always difficult for the not-for-profit sector and run the risk (even if wrongly) of appearing to be a strategy to restrict engagement. For these reasons we add our voice to calls that in the future deadlines for community feedback fall between mid-February to the end of November each year.

Findings from various community consultations that have been held over many years by a number of SCoA's member agencies have found that CaLD clients, generally, face a multitude of barriers to employment or to good-quality employment. These include limited proficiency in written and spoken English; restricted access to affordable housing that is close to transport and/or viable employment options; racism, discrimination and related forms of stigmatisation in the workforce (either in gaining employment or experience in the workplace); failure of employers, professional bodies and education institutions to recognize prior learning and qualifications gained outside of Australia, and/or a limited range of Australian-based work experience.

Furthermore, poor knowledge of Australian workplace systems and behavioural norms, laws (including entitlements), avenues of complaint (where assistance from trade unions can play an important role) are all significant problems as are poor knowledge of, or access to, services to support employment transitions, short-term, casualised and seasonal work. Many CaLD, refugee and international student workers suffer poor conditions of employment including those that are either illegal or opportunistically attempt to function outside norms of industrial law (for example, the case of Baiada Poultry Pty Ltd where, in October and December 2010, according to claims that were reported in the media, one worker was killed and others [mainly recent non-English speaking immigrants] exploited and under-paid).

Because CaLD clients come from enormously diverse backgrounds, with a range of skills and life experiences, there are a number of specifically targeted approaches and programs which have been effective. These include individual case management, mentoring systems to support a transition into the workforce, work experience and individualised training, career advice, planning and job search support, assistance from services that advocate and directly liaise with employers on the client's behalf, and English language classes which include employment-specific skills development and client follow-up in the period after employment has commenced.

Generally speaking, the employment support needs of new arrivals entering Australia under the family and skill streams of the migration program need greater responsiveness. In particular, migrants and refugees may be subject to a two-year waiting period, this means the employment services system provides support to migrants and refugees based on their visa sub-class and length of residence. Those migrants who are subject to a two-year waiting period, before they are able to access income support, only receive stream 1 services - this includes adult refugees who may have limited formal schooling and who enter under the family stream of Australia's migration program as well as migrants and refugees with overseas qualifications and skills entering under the family and skill streams.

The nature and extent of support required by skilled migrants and refugees to achieve employment in their occupation varies based on a number of factors including their early access to recognition support services, access to local work experience, the availability of gap-training and their proficiency in English. Some achieve a sustainable employment outcome in their field relatively quickly and with minimal support. Others, however, require more intensive support from personnel with the specialist knowledge and skills to provide quality services in this area. Some specialist migrant skills and qualifications services (such as the Specialist Migrant Placement Officer Program, previously funded by the New South Wales government) are no longer available and employment service providers are poorly placed to deliver these because they lack the staff with the specialist knowledge and skills to deliver such services.

Innovative vocational education and training models to support sustainable employment outcomes for migrants, refugees and disadvantaged job-seekers from non-English speaking backgrounds have been developed over many years. Examples include orientation programs for skilled migrants, access programs for refugee youth and retraining programs for mature age job seekers. In many states, for example, these programs have been developed and run by TAFE institutes in collaboration with community, employers, and other key stakeholders.

These initiatives often provide vocational skills development that are integrated with English language training. They have been very effective in achieving employment and/or further study outcomes for job-seekers from non-English speaking backgrounds. In the past these programs were funded under a migrant dedicated program – the Advanced English for Migrants Program - which was later subsumed into the advanced vocational stream of the Language, Literacy and Numeracy program (LLNP), also funded by DEEWR. As an outcome of the current LLNP tender this stream of advanced provision is no longer provided for.

The link between education and employment is commonly recognised: the lower the level of education achieved, the higher are job-seekers' labour market disadvantages. For many people from CaLD backgrounds, especially recent humanitarian arrivals, those with higher levels of secondary education or above are better placed to describe their education attainment status; those with lower levels of attainment find it incrementally more difficult to do so. AMES Victoria has reported that over 30% of refugee background job-seekers cannot do so, and over 50% of other job-seekers cannot describe their education attainment status. A particular problem with this confusion is that individuals will struggle to assess their standard of English literacy and are, therefore, more likely to over-estimate their capabilities.

A compounding problem is that some CaLD candidates lack literacy in their first language; in some cases their first language is limited to an oral form and cannot be represented in writing, this makes them particularly challenging to assist into the workforce. Furthermore, employment provider staff are not trained to conduct language assessments and can only guess what a client's standard may be; this can lead to significant or continuing employment performance, retention and matching problems.

Young CaLD job-seekers, particularly those who are first generation humanitarian entrants, are likely to have experienced an array of disadvantages either prior to, or after, their arrival. This can include limited (or even no) schooling, poor English competency, few if any qualifications, vocational skills or work experience in Australia. Like Australian born job-seekers, poor job-readiness and a failure to demonstrate a proven employment history is

a significant barrier to finding work – it is just even more challenge for those whose first language is not English. Not only do they lack a work record, they have no actual experience of searching for employment.

Of particular note is the Employment Pathways Program (EPP) which is run through AMEP, funded by DIAC. At present clients who participate on the program are entitled to 200 hours of combined English language tuition, work training and experience (these are primarily humanitarian entrants and some migrants, depending on their visa category). Such trade 'tasters' have allowed participants at Diversitat (based in Geelong, Victoria) to get experience working in horticulture, construction, cleaning services and office administration. This type of training has been very successful with a 41% employment success rate in horticulture and trades post-EPP experience. This is an employment-transition model worthy of particular consideration by DEEWR.

A number of these observations are reflected in feedback from several of our member organisations, the following lists some of the comments member agencies provided to SCoA based on questions we asked about potential improvements to the current provision of employment services.

How can Job Capacity Assessments be improved?

- I. Job capacity assessments made by Centrelink contractors vary wildly in quality. There is a need to introduce a quality assurance program for these assessors and an element of responsibility for decisions made so that any appeals can be directed to the original decision makers.
- II. They can be improved through greater transparency and explaining to clients their purpose and how they will be used to determine the assistance they need. Some clients treat a job capacity assessment like a job interview and may present far better than the reality of their circumstances and actual capacity.
- III. It is essential that job capacity assessors:
 - are culturally competent and have ongoing cultural awareness training in line with new groups of refugee arrivals
 - use professional and trained interpreters
 - consult with the IHSS and AMEP about their client regarding any issues that may affect their capacity to work
 - provide continuing with AMEP as an option for their clients, especially where they speak little English and are still in the HSS
 - ask their clients to bring with them any relevant information which may affect their capacity to work (such as information regarding disability, health and mental health issues) to their JCA interview.
- IV. While many CaLD job-seekers can legitimately be classified as eligible for stream 1 assistance, the Job Seeker Classification Instrument (JSCI) may be misclassifying a large number of CaLD clients. For example, AMES has identified that almost 22% of its caseload receive stream 1 assistance, thus indicating that the JSCI has not been able to accurately assess need and disadvantage, especially amongst humanitarian entrant job-seekers.

What improvements can be made to services for job-ready seekers?

1. Introduction of a broader work experience program and a relocation assistance program to help those job-seekers who wish to move house to an area offering greater employment opportunities.
2. Targeted assistance to link them with suitable pathways, for example, re-engaging with former professions or career planning.
3. Job Employment Services are concerned about employer relations, this equates to providing employers with people: there is little written material that clarifies what they actually *do* for the client (what the client is entitled to and or eligible for). This results in the services having to provide both training on workplace and industrial matters, as well as other forms of formal training (eg: learning to drive or in-house workplace training); often these responsibilities are borne by other organisations such as humanitarian settlement organisations. For example, the MRC of South Australia provides in-house training through work experience for over 300 of its volunteers, through this process it finds approximately 100 jobs each year for this cohort through its partnerships and relations with employer groups; in addition, through its industry networks it finds another 50 jobs per annum for humanitarian entrants. While doing so it receives no re-imburement from government or from Job Employment Services for this work.

4. Reverse marketing programs, such as those in existence at Diversitat which use a social enterprise model and actively promote candidates' life-skills and experiences to prospective employers, are a model which could be replicated more widely.

How can linkages be improved between HSS, AMEP, SGP and vocational and training providers, employers and employment services?

1. Invite these staff to bi-monthly JSA forums, these are organised around Australia on a regular basis by Centrelink.
2. In the past senior DEEWR staff have made commitments that settlement service agencies would be invited to bi-monthly JSA meetings. This may happen elsewhere but in the South East Melbourne region (where a high proportion of the community is of CaLD background) this has not occurred. If this commitment was met consistently across the country it would help improve linkages across these programs while assisting our clients.
3. Effective and strategic networking that aims to build collaborative approaches and utilises complementary services rather than operating in isolation.
4. The nexus between these services is urgently required so as to ensure that the humanitarian *client* is the focus, rather than JEA prioritising *the employer* or the job, which is quite often the case. The need to maximise communication and coordination of services without one provider 'pulling rank' on another will support informed and effective decision making, appropriate preparation of the client, and it will assist the employer to provide a safe and sustainable environment for the worker. The outcome will include an increase in work retention rates for humanitarian entrants and an opportunity for them to enter into sustainable employment when they have completed necessary preparation such as learning English.
5. Collaborative models for HSS, AMEP, SGP and related JSA stakeholder programs vary widely from state to state, in some jurisdictions where geographical proximity is not an issue (such as Tasmania), DIaC actively champion such meetings in partnership with these providers. There is, however, an inconsistent national model for collaboration – set forums to engage stakeholders could help improve linkages between these service providers and should be encouraged.

How can employment participation be increased for mature-age job seekers?

1. By expanding work experience programs to the private sector: at present only not-for-profits can participate.
2. Employment participation could be increased for mature-age job-seekers through a client focused pathway process that accurately identifies a job-seeker's capacity and how this can be built on and/or developed, rather than a focus on a specific model.
3. Through greater recognition that mature age CaLD job seekers with specific experiences and qualifications should not necessarily be expected to travel along a linear career path but may be supported to move into professional positions that are related or linked. For example, engineers could be retrained to undertake technical trades, para-medical staff to work in health administrative roles, graphic designers to do web-based development work etc.

How can employment and participation outcomes be better delivered in regional and remote Australia?

1. Provide housing and training incentives for people to remain in these areas and make the drift to the major cities less attractive.
2. Through a focus on place-based initiatives and individualised services that look not only to build the capacity of job-seekers but their regional and remote communities by responding to industry and employment needs in those areas.
3. SCoA is presently redesigning web-based approaches to share best practice nationally between its membership; using web-based solutions can be a cost-effective and efficient way of sharing knowledge amongst JSA service providers with large cohorts of CaLD candidates.

What improvements might be necessary to strengthen the performance-base of employment providers?

1. Introduce a methodology that increases the cooperative aspects of several providers working in the same labour market.
2. Implementation of consistent and strategic professional development and training within specific client services such as: remote areas, CaLD clients, clients with disabilities and other severe barriers to accessing employment, operational issues in employment services (such as writing resumes, training job seekers and providing career counselling), and greater collaboration with complementary agencies such as settlement services.
3. Increase the competition for specialist services by opening the program to an open-purchase process for groups at risk. It is also important to ensure that providers have good levels of cultural competence; this requires more than having a bicultural worker on staff, but a governance and management ethos which supports strategies that provide equitable services to people who are relatively new arrivals, are of non-English speaking backgrounds, and to people at risk within CaLD communities.
4. Accountability to ensure employment providers adhere to the processes to which they commit when applying for funding; for example, SCoA has been advised of cases where settlement services have entered into partnership with large job employment providers to support client pre-vocational preparation, only to find that after the agency had been awarded a contract the JEA has failed to respond to requests to fulfil the conditions of the partnership arrangement.
5. Training for JSA providers is important. Cross-cultural competency training, as well as greater awareness of issues relevant to CaLD candidates is important, although it cannot really replicate the in-depth expertise found in specialist settlement agencies which also provide employment services. Forthcoming resources, which will be VET accredited, such as the trainers' resource guide and manual for those who work with forced migrants (developed by Margaret Piper and a consortium of settlement service providers, and with which SCoA has been involved) provide good examples of the kind of training resources that may be used for these purposes.

What role can settlement services play in employment initiatives into the next contracts?

1. Settlement services can efficiently identify, early in their case work, those clients who can be best served by specific employment providers.
2. Settlement services are an essential component in employment initiatives and have a great deal to contribute to future contracts. Their wealth of knowledge and experience can be used to collaboratively strengthen the performance-base of employment providers. Settlement services are also uniquely positioned to provide information and support that will assist building job-seeker capacity to gain and maintain meaningful and sustainable employment.
3. Funding from DEEWR in the next tender process should be open to settlement services for:
 - pre-vocational training for clients of refugee background and other CaLD clients at risk
 - in-house training through work experience and volunteer training
 - six month traineeships that may include front-line management training
 - case-work based employment services for specific target groups through an open purchasing process
 - innovations funding to develop alternative employment models, and
 - funded advocacy roles to engage key employment stakeholders such as JCA, JEA's, employers and industry groups (this funding was available through DEEWR to MRCS over a decade ago and proved highly successful in ensuring linkages, coordination and entry into employment).
4. SCoA – representing the settlement service sector across Australia - will collaborate with its members and key organisations such as ACOSS to review the sector and the effectiveness of new service contracts, this can be done through a range of ways including establishing working parties, research, forums and consultations.
5. Skilled migrants cannot access JSA services for the first two years after their arrival in Australia. Government assumes, because migrants have the skills and qualifications for work in an area of workforce demand, that they *will* be actually employed. However, lack of Australian-based work

experience and, in some cases, discrimination, often form barriers to finding employment. For example, the South East Region MRC (Victoria) has a good record of overcoming these problems through employment case managing, industry-based mentoring and finding work experience for skilled migrants who are facing these problems.

Other comments

- The current system of a competitive employment provider market encourages isolation of the players. They are very reluctant to share labour market information and this leads to an inefficient working of the market and often reduces opportunities for our clients.
- An open purchasing process that provides a fee for preparation, purchase of training, work placement and mentoring/mediation through case management will improve access to the employment market for those job-seekers at risk, particularly those of humanitarian background, job-seekers with disabilities and skilled migrants who are facing various forms of discrimination in the labour market. Such an initiative would resource providers that have a vested interest in empowering these job-seekers through training and employment pathways, as well as supporting these workers through mentoring and mediation with their employer in their first few months at work. This approach to case management will support both parties' interests and enhance the relationship between worker and employer.
- Employment services, especially for CaLD clients, could be better linked to regional development, especially matching labour to areas of skill-shortage in rural industries including farming; this may also involve matching with the rural lifestyle, environmental skills and preferences to areas of employment. There is also a strong correlation between transport and access to key labour market opportunities particularly in finding rural, seasonal, lower skilled or shift employment – this is another factor which should be considered more thoroughly by employment service providers.
- Many CaLD clients – skilled migrant, but particularly humanitarian background – locate in areas where accommodation is more affordable. Such locations are often poorly serviced by public transport infrastructure, as a result this makes it difficult for them to continue accessing employment service support. For this reason there is a need for outreach services funding for specialist JSAs so they are able to better support high-need but complex-case clients who are physically remote from their service hub.

SCoA is concerned that generalist one-stop-shops are unlikely to offer the flexibility, expertise or resources that would allow services to provide the targeted assistance for CaLD clients which have proven to support their employment transition. These elements of success are:

1. specialist employment services (see below)
2. specialist assessor staff are better placed to 'understand' (literally and metaphorically) the circumstances, experiences and capacity of CaLD/refugee job-seekers due to more specialised training and experience, thus providing better service. For example, many JSA do not provide the kind of skills-development that CaLD clients need for job-seeking skills and understanding workplace culture in Australia. In generic training programs people from non-English speaking backgrounds often struggle to remember or understand everything they are being taught. This can result in confusion, their literacy levels can decline, and they are more likely to cease receiving the support they need owing to embarrassment or apprehension; this experience can compound mental health-related problems which many humanitarian entrant clients may already experience
3. employers who are committed to respecting or encouraging workforce diversity (for example, through supportive/democratic team processes, diversity training for personnel and managers, flexible work-practices, anti-discrimination and substantive equality initiatives); receptive small business and social enterprises may be particularly receptive to developing more inclusive approaches to the skills offered by CaLD job-seekers
5. individual experience and preferences respected in career planning and pathways to employment
6. a commitment to co-ordinate and collaborate between clients and their communities, education and training providers, employment services and employers (for example, in relation to English language

competency; skills, prior education and qualification recognition; bridging programs; specialist industry training for CaLD workers, and flexible job location placement).

In 2010 the Australian Human Rights Commission completed a review of the human rights issues facing African Australians and found they encountered many problems using employment service providers. These included finding the system complex and confusing with insufficient time available to determine personalised employment pathways or to find employment that matched their skills and interest. Community participants argued that specialist settlement services were best at understanding the issues newly-arrived communities face and, as such, at helping them to find a job (see: http://www.hreoc.gov.au/africanaus/review/in_our_own_words.pdf).

What is true for visibly distinct African clients would appear (from SCoA member organisation experience) to be equally true for other CaLD client groups. A report commissioned by the Refugee Council of Australia: *What Works - Employment Strategies for Refugee and Humanitarian Entrants* (72ff, June 2010, at: http://www.refugeecouncil.org.au/docs/resources/reports/What_Works.pdf) highlights many of the strategies proven to assist CaLD, in particular it notes that specialist employment services, rather than generalists, are more likely to incorporate into their client services:

- personalised case management
- sourcing access to work experience
- continuing support searching for employment, applying for positions, developing interview skills and staying in employment
- advocacy and liaison for their clients with employers
- culturally sensitive explanations and induction to work cultures, behaviours and systems in Australia
- career advice and planning which respects client preferences, skills and experience
- mentoring programs
- post-employment support
- bi-cultural, bi-lingual and culturally competent workers
- advice on how to manage discrimination and racism in both community and employment settings, including working rights, human rights, and avenues of redress.

SCoA would also like the department to consider what can be described as the impact of secondary resettlement on JSA providers. Settlement comes at significant costs to both the Commonwealth as funder, and to those agencies providing settlement services. Individuals, their families, and even segments of communities may relocate (often a small cohort may move, triggering others to follow) this is often driven by issues such as employment opportunities or a desire to co-locate with a larger group of the diaspora community. This can provide many challenges and costs to providers and to society at large, such problems have recurred in states such as Tasmania and can skew the labour market in what is a relative small economy.

Conclusion

To give an honest appraisal of optimal employment opportunities for humanitarian entrants (and CaLD communities more generally) it is important to note how employment is linked to other key determinants of outcomes for both the individuals concerned as well as for the wider Australian society. SCoA understands that this is beyond the specific ambit of your responsibility as Minister, nevertheless, neglecting to mention these issues fails to acknowledge the complex and inter-connected processes effecting the employment-related social inclusion of vulnerable communities and their members.

Access to appropriate, adequately remunerated work where legal conditions of employment are met, provides a pathway to better self-esteem and health generally (these are the social determinants of health), employment helps ensure adequate accommodation, nutrition and social inclusion; it may also impact upon education and training opportunities. The conditions that allow this to occur are not restricted to the industrial setting – employment laws may provide some important protections – but these must be strengthened by a broader normative setting such as committing to other human rights protections (many worker-rights are covered under human rights based conventions and treaties). Australian is the only liberal democracy that has failed to enact

some form of human rights charter (either legislative or constitutional) and the infrastructure of protections against discrimination are woefully inadequate, especially for those who have experienced racially-based discrimination.

In the meantime policies that at least promote some level of general acceptance of standards of social and cultural respect, most notably a national multicultural policy, have still not been enacted: it is no longer sufficient to continue to direct blame for inaction on the Howard Government. The egregious failure of moral leadership on the issue of racism now lies with the current government. Access and equity programs (which are a way to promote substantive equality and social justice) are neglected, further legitimising, through inaction, racism. The recent study by Booth et al (*Does Racial and Ethnic Discrimination Vary Across Minority Groups? Evidence From a Field Experiment*, Economics Letters, Vol.107, No.2, May 2010, [accessed 24 January 2011] at: <http://people.anu.edu.au/andrew.leigh/pdf/AuditDiscrimination.pdf>) illustrates how employers regularly discriminate against job applicants with 'non-Anglo' names, even when their curricula vitae are identical to those who do.

Another ongoing area of systemic failure relates to overseas skills recognition. While the competition policy reform agenda of the 1990s provided significant growth to the Australian economy, deregulation often resulted in the most economically vulnerable paying the cost, especially the low-skill, low-paid, poorly literate workforce. Very often these were migrant and former refugee employees. At the same time powerful and wealthy groups were able to excuse themselves from competition policy; this has meant they have been able to determine the supply rather than the demand side of the employment market. For example, specialist medical colleges have been able to control the supply of specialist by claiming their colleagues with overseas qualifications must be excluded from membership of the colleges, thus removing them from much of the workforce and a viable income in the long-run. What applies in this setting applies across a range of professions, this continues to impact upon thousands of individuals who have come to Australia either freely (as skilled migrants) or under the humanitarian program by using the claims of professional accreditation as grounds for exclusion.

While we acknowledge this issue cannot be addressed simply (public safety and maintaining competency standards are, for example, legitimate grounds to argue against 'open slather' in this area) we do believe it is made more complex than necessary. It is an excuse to maintain protectionist practices and provides no grounds to delay progress on establishing bridging-training programs or reviewing the competency and related standards of overseas-sourced education and vocational training. This is, amongst others, a matter of ethics and national duty-of-care.

Torpor in these areas are, fundamentally, about respecting the rights, responsibilities and agency of individuals. It also carries with it significant costs, the:

- 1) economic costs of racism
- 2) costs (to GDP growth) of a lack of work participation
- 3) community costs of marginalisation and disenfranchisement, and
- 4) security costs of allowing rifts to develop in society and the consequential festering of the resentment of the excluded.

Recommendations:

1. SCoA's membership, generally, holds the view there is room for more consistent streaming of candidates from refugee backgrounds into JSA services (streams 1 to 4). A common recommendation has been that candidates from refugee backgrounds are able to receive the more intensive support that is provided through stream services 3 to 4. Allocation of stream 1 assistance, particularly in cases where clients have experienced torture or trauma prior to their settlement in Australia, is not uncommon but is completely inappropriate for this cohort
2. The JSCI be amended* to better classify CaLD clients (in particular those from humanitarian entrant backgrounds) especially in relation to client work history, English language proficiency, living circumstances, education attainment and vocational qualifications, to ensure they receive the most appropriate stream service

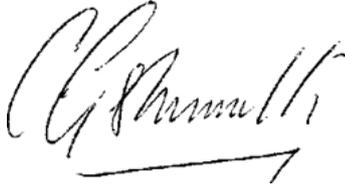
* along the lines proposed by Ary Laufer, AMES General Manager Employment, in correspondence of 3 December 2010 to Stuart Watson NSW State Manager Employment DEEWR; these recommendations have been mirrored in the current submission round by ACCES Services (Brisbane)

3. At present Centrelink refers clients seeking employment to those who they deem to be the appropriate provider. Given that job-seekers from a CaLD background tend to be complex clients they are often inappropriately assessed and 'fall between the cracks' of the employment services system. SCoA recommends that all CaLD job-seekers (whether they have a background of entry into Australia under the humanitarian or migration streams) be automatically referred to a specialist JSA provider for their assessment and support
4. In relation to those candidates with a background of trauma prior to settlement in Australia, there is room for increased co-operation between state and territory health and human services agencies and DEEWR around specialised client support. SCoA strongly recommends that co-operation is improved between these tiers of government for these vulnerable employment service clients
5. Specialist migrant/refugee services are best placed to understand and support newly-arrived communities and to assist humanitarian entrants' and skilled migrants' entry into the workforce. Given they are also more likely to employ people from a range of cultural, racial and religious backgrounds than 'mainstream' employers, this can help build confidence amongst their clients (seeing a culturally/racial diverse 'face' in a service can be a positive experience for those searching for employment). This adds to the argument that settlement service agencies should be the preferred employment providers for these clients
6. Where no specialist JSA services are available, specialist assessors with a background and understanding of humanitarian entrants and skilled migrants should, as a general principle, be allocated by employment service providers to support CaLD clients
7. Social enterprise programs (which function somewhat like a labour hire firm by brokering employment arrangements between a settlement service's CaLD clients and local employers) have been successful in organisations such as Diversitat. However, social enterprise initiatives are often operated at the settlement service *without* specific funding. Given their success, SCoA recommends that a national employment program, to extend these successful social enterprise/employment transition initiatives, should be introduced by DEEWR
8. Specialist training (such as cross-cultural competence, Australia's humanitarian program, the specific needs and issues of refugee/CaLD communities, and skilled migrants who are facing forms of employment discrimination) should be included in Job Search, LLNP and industry-specific training for employment services staff
9. Participants on the DIaC funded EPP through AMEP have been calling for an extension of the program, looking for more hours to increase both their English language and vocationally-based training and experience. The main limitations of the scheme have been its quota of 200 hours per client and the restriction to a single industry/sector 'taste'. SCoA recommends that DEEWR run a similar scheme or works with DIaC to extend the current program
10. The employment services model needs to be amended so as to build greater flexibility into the way migrants and refugees are supported who are subject to the two year waiting period
11. When contracts with JSA providers are renewed there should be some access and equity form of audit to determine whether or not those awarded with contracts have met their obligations to CaLD communities, failure to do so should be met with a range of penalties. In addition, when JSA services fail there needs to be remediation to ensure services are maintained for more vulnerable candidates (for example, as is currently the case in Western Australia)
12. A number of the programs that received funding under the Jobs Fund, which is due to terminate at the end of June 2011, should be sustained (extended or rolled into another DEEWR initiative) at least for the medium term. Contracts with a number of services have helped to build staff teams and expertise, community expectations, employer support and networks; early results have been successful and terminating these initiatives so soon after their commencement would represent a poor investment in outcomes for both clients and employers
13. The Australian government should collaborate with state and territory governments to establish two additional employment-related initiatives for CaLD communities: [1] skilled migrant and refugee employment advisory services that are available to all family and skilled-stream migrants as well as to humanitarian entrants, and [2] an employment and training program available for both under-employed

and unemployed, and for which both family and skilled-stream migrant arrivals subject to the two year waiting period, as well as humanitarian entrants, are eligible.

I hope these comments are of assistance, I would be happy to expand on them further if your department wishes to contact our organisation.

Yours sincerely

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

Conrad Gershevitch

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