



Settlement
Council
of Australia

Submission:

**Senate Inquiry into Australia's
engagement in Afghanistan**

Settlement Council of Australia

January 2022

The Settlement Council of Australia acknowledges the traditional custodians of the land on which we operate, the Ngunnawal people. We also acknowledge the traditional custodians on the various lands on which migrants and refugees settle across Australia, and on which our sector operates.

We pay our respects to Elders past, present and emerging and celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to our lands and waters.

About the Settlement Council of Australia

The Settlement Council of Australia (SCoA) is the peak body representing the vast majority of settlement agencies across Australia providing direct services and support to people of migrant and refugee backgrounds.

Our members include organisations large and small, who are committed to the successful settlement of migrants and refugees across the country. Their services range from greeting new arrivals at the airport, through to assisting them to secure housing, learn English, make social connections, access services and find their first job. Australia's settlement services are recognised as being among the best in the world.

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Introduction

The Settlement Council of Australia is the peak body representing organisations that support Australia's migrants and refugees. We welcome the opportunity to provide this submission to the *Inquiry into Australia's Engagement in Afghanistan* (the Inquiry).

SCOA is providing this submission in relation to the following two key points on which the Inquiry has sought further information:

- the capacity, suitability and delivery of settlement programs and support services for Afghans who have arrived in Australia; and
- updates on Australia's humanitarian visa intake from Afghanistan and visa processing issues.

Given the focus of the Inquiry's request is on Afghans who have arrived in Australia, this submission focuses on Afghans who have arrived in Australia through the evacuation effort. There are a range of other issues affecting Afghan diaspora communities living in Australia which are beyond the scope of this submission. The majority of our submission focuses on settlement programs and support services, though we do raise some issues in relation to visa processing – specifically in relation to family reunion, as this directly affects the evacuees.

In summary, we commend the Australian Government's evacuation of Afghan nationals, and recognise the positive humanitarian impact of saving so many lives in such a short period of time. We witnessed extraordinary support for Afghan evacuees from all parties – the Australian Government, the settlement sector, Afghan diaspora communities, former defence personnel, and the broad Australian public. All involved did the best they could to support Afghan evacuees considering the difficult circumstances and significant constraints within which all were operating. Notwithstanding this humanitarian achievement, we make some recommendations for improving Australia's capacity to respond to similar emergency situations, and to support a larger intake of refugees. Consideration of these recommendations would support Australia to commit to a much larger humanitarian intake from Afghanistan, which we urge the Australian Government to do in light of the crisis in Afghanistan and Australia's longstanding involvement in Afghanistan.

Overview of available settlement support

Australia has a range of settlement programs, funded by the Australian Government, that support the settlement of refugees. These programs work alongside other programs, and Australia's broader social infrastructure and communities to support newly arrived refugees to establish their lives in Australia. Their main programs related to settling Afghan evacuees are outlined in summary form below. SCOA's members include providers of all the below programs.

Humanitarian Settlement Program (HSP)

This program supports humanitarian entrants and other eligible visa holders during their initial settlement, providing them the skills and knowledge required to become self-reliant and active members of the community. The types of support provided may include assistance to learn English, gain employment, access education and training, sourcing short term accommodation and providing connections to local community groups and activities.

Typically, a HSP case manager meets a newly arrived refugee at the airport, and works closely with them to identify and support their settlement needs over an 18 month period. In relation to the Afghan evacuees, HSP providers have had the most engagement with this group and have been responsible for case management of their overall settlement.

Settlement Engagement and Transition Support (SETS)

Humanitarian entrants and other eligible visa holders are eligible for the SETS program for up to 5 years. The SETS program aims to encourage humanitarian entrants and other eligible visa holders to address their settlement needs, improving social participation, economic wellbeing, independence, personal well-being and community connectedness. The program comprises of two components: SETS – Client Services, which provides information and assistance to access mainstream and other relevant services; and SETS – Community Capacity building, which helps new community groups and organisations support their specific communities towards increasing the social participation, economic and personal well-being of community members.

Adult Migrant English Program (AMEP)

The AMEP is a free service to help eligible migrants and humanitarian entrants with low English levels to improve their English language skills and settle into Australia. Those eligible can access unlimited hours of English classes until they reach the level of vocational English.

Additional support package for recent arrivals from Afghanistan

On 14 October 2022, the Australian Government announced new funding of \$27.1 million over two years to support recent evacuees settle in Australia. The package includes:

- Support to community organisations to support new arrivals
- Specialist legal services to support evacuees to transition from 449 visas to permanent visas
- Support to navigate skills recognition and education pathways
- Mental health support to Afghan refugees and communities

Responding in crisis

SCOA welcomes the Australian Government's evacuation of over 4,000 individuals from Afghanistan in August 2021. The rapid implementation of the 449 visa and related processes is commendable, and through implementing this process quickly, many lives were saved. We further welcome the Government's decision to ensure all evacuees, irrespective of visa status or whether they were a citizen, were eligible for support through the Humanitarian Settlement Program. While below we provide several recommendations for how support to Afghan evacuees can be improved moving forward, and for planning for future intakes, we should not lose sight of the humanitarian impact of this evacuation process.

Afghan evacuees who arrived in Australia arrived in circumstances that are unique and different to other refugees. Ordinarily, refugees would flee to a third country and then apply for resettlement. Once accepted, they are given detailed information about what to expect, and what life in Australia is like. This provides some preparation for the settlement journey ahead.

In contrast, the Afghan evacuees have come to Australia directly from a state of conflict. In ordinary circumstances, clients would have undertaken health checks overseas, attended a basic program of orientation about what to expect of life in Australia, and had time to pack their belongings. None of this was possible in the circumstances. The journey to Kabul airport and leaving Kabul airport was deeply traumatising, and was immediately preceded by significant fear, anxiety and persecution. On arrival in Australia, the arrivals were isolated for two weeks in

hotel quarantine. Upon release from hotel quarantine, many found themselves entering straight into COVID-19 lockdowns. During this time, the arrivals became the focus of intense media attention, and many journalists, members of the public, and others sought to contact them. This experience is distinct from the resettlement experience of most humanitarian entrants who arrive in Australia.

Few resettlement countries have the level of comprehensive settlement support available on arrival offered by Australia. Australia's settlement infrastructure is among the best in the world, and by having this long-standing infrastructure in place, it could be rapidly mobilised to support Afghan evacuees.

The efforts to support newly arrived Afghan evacuees have been extraordinary, particularly from HSP providers who have primary responsibility for supporting their settlement. Thousands, upon thousands of extra hours of work beyond what is required in funding contracts have been invested by staff working in the HSP program across Australia since the arrival of Afghan evacuees. In NSW, which received approximately a quarter of the arrivals, staff in the program recorded 14,000 hours of additional work above and beyond what was required in the funding contract within 3 months of commencing settlement of the evacuees. Staff nationally were working at all hours of the night – some staff were arriving at Hotel Quarantine to meet clients at 3:30am. In Melbourne, three additional short term accommodation facilities were utilised to house up to nearly 3000 individuals and 300 long term properties have been sourced – the equivalent of finding housing for an entire small country town. Tens of thousands of items of clothing were purchased for clients who had left with nothing but the clothes on their backs. All of the providers have expended substantial funds servicing needs of clients that have been out of the ordinary course of business and beyond the scope of contracted services.

These achievements are all the more phenomenal when considering the circumstances – a largely scaled back program due to COVID-19; and operating within quarantine and lockdown rules. The impacts of each of these are outlined in further detail below.

Scaling up rapidly

Since March 2020, the HSP providers had been forced to scale back their capacity significantly due to the COVID-19 pandemic. The program previously received approximately 18,750 clients annually, however between April 2020 and June 2021 only approximately 700 clients arrived.¹ This profoundly affected the baseline capacity of the program, as the program operates on a fee for service model where the majority of funding is paid per service provided to individual client or family.

Due to substantially reduced funding for the program, many staff employed in the HSP had to be let go. Other staff found work elsewhere due to the uncertainty. In November and December 2020, SCOA undertook a survey which asked how staffing levels were affected by COVID-19. We found 24% of respondents indicated that the number of FTE employees had decreased over the previous 12 months as a direct result of the COVID-19 pandemic.² The effects were

¹ "Still Left behind: Stranded Refugees and Residents on Temporary Visas Must Be Part of Australia's Re-Opening Plan" (Human Rights Law Centre), accessed January 18, 2022, https://static1.squarespace.com/static/580025f66b8f5b2dabbe4291/t/6193790d31825105593e7995/1637054742951/HR21_11_Travel+Restrictions_A3.pdf.

² "State of the Sector 2020" (Settlement Council of Australia, 2021), <https://scoa.org.au/wp-content/uploads/2021/06/State-of-the-Sector-2020-FINAL-REPORT.pdf>.

particularly acute for providers of the HSP program, compared to other settlement programs that did not operate on a fee for service model. Comments from respondents indicated a further reduction in staffing during 2021 was likely to be due to the continuing pandemic. This came to bear over 2021 for several of the HSP providers. For example, one provider said that in the week prior to the arrival of the evacuees, they had made 50 staff members redundant.

Against this backdrop, suddenly in August 2021, the HSP providers were faced with one of the largest and most sudden intakes of clients in the history of the program. The providers had incredibly short notice of new arrivals. In some cases, they were notified of arrivals just 2 hours before they were set to arrive. Providers had little notice to allow them to source short term accommodation, furnishings, groceries, clothing, arrange airport pickups, interpreters, and other immediate needs. This would be a challenge even when the program was operating at regular capacity and was made all the more challenging by the program having been weakened in the months prior to the evacuation.

Quarantine and COVID-19 lockdowns

Settlement, like many other social services, is best delivered through human interaction and individual guidance. Due to border requirements at the time, all Afghan evacuees arrived into hotel quarantine, preventing settlement providers from engaging face to face with clients. Further, quarantine locations were not necessarily aligned with locations where clients would ultimately settle. This meant many clients were unable to establish initial rapport with their case manager upon arrival in Australia. While these factors were inevitable in the circumstances, they posed additional challenges to settlement.

In Victoria and NSW, where the vast majority of evacuees settled following hotel quarantine, clients arrived into COVID-19 lockdowns. This made every stage of settlement infinitely more complex. For example, in many areas, there were restrictions on the distance that could be travelled, making it difficult for teams to do the travel between suburbs necessary to fully furnish houses, purchase clothing, purchase culturally appropriate food and other items, take clients to appointments, and other tasks. While settlement services had resumed face to face operations, many allied services and offices were closed or operating remotely making it difficult to coordinate services and needs provided by other mainstream providers.

COVID-19 had a significant impact on supply chains, stock levels, and whether retail shopfronts were operating, further making it challenging to obtain the goods needed. A task as simple as going to a retailer to purchase an item for a client, turned into complex negotiations with large companies on how to get urgent supplies for Afghan evacuees.

The spread of COVID-19 and levels of transmission created additional risk for providers in facilitating volunteer support, or linking clients with other forms of social support. Whereas Australians, including members of Afghan diaspora communities, were enthusiastic to engage with clients and provide support – this was often either not possible within COVID-19 restrictions, or high-risk due to levels of COVID-19 transmission.

Current settlement challenges

The settlement progress of Afghan evacuees is promising. A survey conducted by AMES Australia found Afghan refugees evacuated to Australia overwhelmingly feel safe, supported and optimistic about their futures. More than 91 per cent of survey respondents said they felt

'welcome and supported' after arriving in Australia; and more than 94 per cent said they felt safe. Asked whether they felt optimistic overall about their future in Australia, more than 90 per cent said they did.³

Notwithstanding the overall positive experience of settlement, there are some challenges that require specific attention. These are outlined below.

Family reunion

Many Afghan evacuees who have arrived in Australia have unfortunately been separated from immediate family members overseas. Where families are separated, this becomes the immediate focus and priority of the client, affecting progress in their settlement journey. It is impossible for a client to feel settled until they are reunited with immediate family members.

Out of desperation to be united with their families, some clients are spending significant time asking any individual or service that might possibly be able to support them for advice, hoping for a favourable answer. However, due to arriving on a 449 visa, there is little certainty about the pathway forward for reuniting with families. A clearer pathway for family reunion and clear advice on how family reunion will be facilitated would provide some assurance to clients, and assist them in focusing on other aspects of their settlement journey in the interim.

Recommendation 1: The Australian Government should provide clear advice and messaging on the pathway for family reunion for 449 visa holders separated from immediate family.

Housing

The majority of those arriving will be on income support payments, at least initially. The inaccessibility of housing for those reliant on income support has been extensively documented.⁴ This is an ongoing challenge for some providers, depending on their location and the availability of affordable housing in the relevant settlement location. Some regional areas, which were more affordable prior to COVID-19, have become unaffordable due to an increase in working from home arrangements which have seen many moving to regional locations.

Compounding the general unaffordability of housing for those on low incomes, has been the fact that, at the time of writing, those arriving on 449 visas are not eligible for bond assistance loans in some jurisdictions. Ordinarily, clients of the HSP program would be eligible, however as they are not permanent residents, some jurisdictions preclude access to some of their services and supports. Paying for bonds and advance rentals is a significant expense and not realistic for those who have arrived in Australia with few (if any) financial resources.

Many of the solutions to housing accessibility for refugees require addressing housing affordability in a more general sense. Making the market more accessible to those on low

³ "Evacuated Afghan Refugees Feel Safe and Welcome – Survey," *AMES Australia* (blog), December 2, 2021, <https://amesnews.com.au/lead-story/evacuated-afghan-refugees-feel-safe-and-welcome-survey/>.

⁴ "Housing Affordability," Australian Institute of Health and Welfare, accessed January 18, 2022, <https://www.aihw.gov.au/reports/australias-welfare/housing-affordability>.

incomes generally, will assist refugees to enter the housing market. However, there are couple of measures worth considering in the specific context of Afghan refugees.

First, we have seen a huge outpouring of community goodwill for Afghan evacuees, with many wanting to contribute but unsure how. Housing is an area where there is a particular value add for Australians who own investment properties to contribute to the settlement of Afghan refugees.

Recommendation 2: Mechanisms to support increased access to affordable housing should be explored, including through considering how offers of community goodwill can be leveraged, and engaging in more comprehensive settlement planning for future settlement.

Second, insofar as consideration is being given to further larger intakes of refugees, careful consideration should be given to settlement planning together with providers, allied services, states and territories, and local governments. This way, locations where there is more affordable housing and other suitable infrastructure can be identified, and refugees can be settled in those locations. With foresight, local services and stakeholders can also plan for housing and other needs. This is discussed further below in relation to a recommended larger intake of Afghan refugees.

Tertiary education

As mentioned previously, many of the Afghan evacuees who have arrived are highly skilled, well-educated and enthusiastic to start studying or working in their respective professions. However, due to being on a 449 visa, they are currently treated as international students for the purposes of university education. This effectively precludes them from engaging in tertiary education unless they can obtain a scholarship. Amendment to the rules to allow 449 visa holders to access FEE-HELP loans and commonwealth supported places would allow them to move forward with their settlement journeys sooner.

Recommendation 3: The Australian Government should ensure 449 visa holders are eligible for HECS/HELP loans.

Better equipping the HSP to respond to emergencies and changing needs

The nature of clients engaged in the HSP, as well as the circumstances in which they arrive, mean the program must expect the unexpected. In recent years, there have been a number of out of the ordinary events that have required adaptation and change in the program. This has included the additional intake of 12,000 Syrian and Iraqi refugees, bushfires, COVID-19, and the Afghan crisis. However, a lack of emergency preparedness in the program, fluctuating funding reliant on client numbers, and limited flexibility inhibit the extent to which the program can easily adapt to these circumstances. While providers have been able to manage these changes nonetheless, adjustments could be made to the program to make adapting to extraordinary events smoother.

Unfortunately, the drivers of global conflict are increasing, and global and local crises are likely to occur much more frequently.⁵ This reality has forced many parts of our social infrastructure to turn their minds to disaster management. The events of the past two years (including bushfires, COVID-19, and the Afghan crisis) require a similar reorientation in our settlement infrastructure.

Emergency planning and disaster management

The HSP is well suited to being mobilised in situations of crisis or emergency, and was therefore able to successfully support evacuees from Afghanistan. However, the HSP model and contract does not provide a clear plan that could be activated in a state of crisis or emergency. Embedding clearer emergency management plans within the program would ensure the HSP is better placed to respond to any future emergencies of a similar nature. Such a plan would provide clear roles and responsibilities, and a clearer authorising environment for HSP contractors to operate beyond the usual scope of the contract to respond to extraordinary circumstances. We note the submission by Red Cross Australia further elaborates on improvements that can be made to ensure the HSP is best placed to respond in emergency contexts in future. As noted above, in the current global climate, crises such as these are likely to increase in frequency and it is therefore necessary that relevant programs and stakeholders are prepared.

Stable funding

Ongoing funding allowing a greater level of baseline capacity in the HSP is essential to better enable the HSP to respond to changing needs within the program, and emergency circumstances. This would ensure a certain baseline of skilled staff can be maintained, maintenance of a pool of casual staff that can be used for surge capacity, volunteer management to leverage community goodwill, relationship building, a minimum stock of housing supply, and other basic activities that provide a foundation for the program to quickly and efficiently pivot when needed. While the range of foundational activities is diverse, two especially pertinent factors are outlined here to illustrate how fluctuating funding limits the program – staffing levels, and relationship building.

Settlement work is a specialised skill set. It requires a high level of cultural responsiveness and understanding of the refugee journey, among other skills. However, it is not an occupation for which there is any established university or vocational qualification. Rather, it takes time and investment in employees to develop the expertise and skill required to perform the job. The loss of these employees greatly impacts the capacity to deliver high quality settlement support. The constantly fluctuating levels of funding limit the extent to which providers can recruit and retain permanent, skilled, staff. Ideally, there would be greater capacity within the program to retain permanent skilled staff. In addition, there should be capacity to retain and manage a pool of casual staff who receive regular training and can support unusual surges in service delivery.

Constantly fluctuating funding further affects the depth and breadth of relationships that providers can maintain. It is too late in the midst of a crisis to start building relationships. Those relationships must already be in place in order for them to then be mobilised quickly. In relation to the Afghan crisis, providers mobilised a wide range of relationships across areas as diverse

⁵ United Nations High Commissioner for Refugees, “Global Trends in Forced Displacement – 2020,” UNHCR, accessed January 18, 2022, <https://www.unhcr.org/statistics/unhcrstats/60b638e37/global-trends-forced-displacement-2020.html>.

as health, education, transport, housing, diaspora communities, the private sector, and many many others. These relationships were critical to servicing the needs of new arrivals quickly.

Investing in maintaining networks and relationships is resource intensive, and a resource burden that is generally not well recognised in funding agreements as it often cannot be directly tied to any particular achievement, but indirectly enables a range of achievements across programs. The need for deep relationship building is not adequately recognised in the existing HSP program, as the funding model is mostly focused on payment for services delivered to individual clients or cases. This, like other activities in the program, is not an activity that takes place in relation to any individual client, but for the benefit of clients as a collective.

Increased flexibility in the program

The HSP funding model is highly rigid. Providers deliver services in accordance with a set schedule of payments which is highly prescriptive. This includes specific payments for certain appointments, sourcing housing, enrolments in essential services, meeting clients at the airport and others. The nature of client work however, is that it is impossible to capture the possibilities of what may be useful to a client at a particular point in time within a set schedule of payments. HSP clients come from a diverse range of contexts, cultural backgrounds, and life circumstances and their settlement needs are equally diverse.

Within this particular cohort, there have been a number of unique needs that are not well captured by those anticipated in the schedule of payments. As discussed above, most clients arrive with their basic belongings so do not need to be provided with much clothing, however this cohort have arrived with few personal belongings. Essential registrations are a much quicker task when essential services are operating face to face services, and the additional hours required during COVID-19 for this task are not recognised in the payment system. Due to the high-profile nature of the evacuation, and some of the evacuees, demands were placed on service providers to respond to media requests and those seeking to be put in touch with evacuees. The list of out of the ordinary tasks that were completed is endless.

While there is scope to negotiate additional services with the Department, greater flexibility should be embedded into the contracts so that providers have the authority to act to meet the needs of clients, without needing to consider whether the cost will be accepted by the Department, or whether the organisation has the resources to bear the cost outside of the contract.

Recommendation 4: The funding model of the HSP should be reviewed to ensure greater stability and flexibility in the program.

Greater capacity to scale other essential services

It was not only HSP providers who had to scale up swiftly to support settlement of new arrivals, but a larger network of infrastructure that supports settlement. This includes essential services such as Medicare, Centrelink, schools (including specialised classes for refugee children), the Adult Migrant English program, torture and trauma services, refugee health services, and a range of others. The experience of the HSP providers was that capacity to scale up quickly varied among services, with some able to respond more quickly than others.

With COVID-19 lockdowns and Services Australia offices not operating face to face, essential registrations such as Medicare and Centrelink were especially challenging. Delays in obtaining Medicare cards, healthcare cards, and income support further affected the settlement process for clients. Insofar as the Government turns its mind to future intakes of Afghan refugees, we recommend clear plans be put in place to ensure allied services that work alongside HSP to support settlement can scale up their operations accordingly. This is discussed further below.

We can, and should, support a large intake of Afghan refugees

While recognising the sector has faced limitations in supporting Afghan evacuees, it should be noted that they have in fact scaled up to support their settlement. The fact remains, Australia has successfully welcomed over 4,000 Afghan evacuees. While there have been some challenges, and there are lessons that can be taken forward into future resettlement efforts, the settlement of Afghan evacuees has been successful overall. Australia, and our settlement infrastructure, is capable of settling many more Afghan refugees – especially if the recommendations made in this submission are considered.

Immediately following the fall of Kabul, SCOA asked its member organisations whether the sector had the capacity to support an intake of at least 20,000 Afghan refugees, as has been called for by many other advocates. The overwhelming response was yes – and in fact, the sector would be prepared to settle many more than 20,000 refugees.

The sector has settled large additional intakes of refugees before. In 2015, Australia initiated a special program to resettle 12,000 additional refugees from Syria and Iraq. Australia has a long tradition of responding decisively and generously to humanitarian crises, as further demonstrated by special intakes of Albanian Kosovars in 1999 and Vietnamese refugees following the Vietnam war. As a nation and as a sector we have the experience and capabilities for such an undertaking.

It is not just the settlement sector that stands ready and willing to support a large intake of Afghan refugees. The broader Australian community, as evidenced in many submissions put to this Inquiry, are enthusiastic to welcome and support Afghan refugees. Many community members provided extensive support to HSP providers to support the settlement of new arrivals – including donations, time and funding. The support from the broader community was so great, that it was more than could be used by the HSP providers at that time. However, it shows that there are great resources in the community that can be leveraged to support a higher intake of Afghan refugees.

Afghan diaspora communities have also proven to be an immense resource, ready and willing to support evacuees to settle in Australia. Many are employed by or volunteer with settlement service providers, and are critical in ensuring the sector provides tailored, and culturally responsive support. In addition, various Afghan community groups have volunteered to assist those who have arrived in practical ways, and have provided extensive social support.

Recommendation 5: The Australian Government should commit to an intake of no less than 20,000 Afghan refugees.

The enormity of the present crisis in Afghanistan and the threat it poses to life and freedom

cannot be underestimated and warrants an increased humanitarian intake similar to that which has been extended in previous crises. This is especially so considering Australia's long involvement in Afghanistan. The obligation to provide additional humanitarian resettlement to Afghan refugees has been recognised by Canada and the United Kingdom with each committing to taking 20,000 Afghan refugees.

To further support the effective settlement of such an intake, we recommend the arrival of refugees be preceded, insofar as is practical, by comprehensive settlement planning. This would involve not only engaging with HSP providers, but also allied services, other government agencies (such as Services Australia), state and territory jurisdictions, local governments and local community groups. Such a process allows government to identify which locations have infrastructure, including affordable housing, that best supports new arrivals. It would also allow the goodwill of community groups to be fruitfully directed to gaps and ensures these groups add value to the settlement journey. Finally, it ensures various stakeholders can more smoothly scale up their operations. While none of this was possible for the Afghan evacuees, there is an opportunity to do this for a future large and planned intake of Afghan refugees.

Recommendation 6: The Australian Government should conduct comprehensive settlement planning for a future large intake of Afghan refugees, including the following:

(a) Considering the extent to which allied services need to scale their operations, and supporting them to do so; and

(b) Identifying suitable settlement locations, and any steps that need to be taken to prepare those locations for settlement.

Summary of recommendations

Recommendation 1: The Australian Government should provide clear advice and messaging on the pathway for family reunion for 449 visa holders separated from immediate family.

Recommendation 2: Mechanisms to support increased access to affordable housing should be explored, including through considering how offers of community goodwill can be leveraged.

Recommendation 3: The Australian Government should ensure 449 visa holders are eligible for HECS/HELP loans.

Recommendation 4: The funding model of the HSP should be reviewed to ensure greater stability and flexibility in the program.

Recommendation 5: The Australian Government should commit to an intake of no less than 20,000 Afghan refugees.

Recommendation 6: The Australian Government should conduct comprehensive settlement planning for a future large intake of Afghan refugees, including the following:

(a) Considering the extent to which allied services need to scale their operations, and supporting them to do so; and

(b) Identifying suitable settlement locations, and any steps that need to be taken to prepare those locations for settlement.