



Settlement
Council
of Australia

15 December 2022

Select Committee on Workforce Australia Employment Services: ParentsNext

Dear Committee,

I write to provide some brief comments in relation to the ParentsNext program. While I do not make any firm recommendations, I provide the below observations based on our network's experience working with migrant and refugee women to assist the inquiry in its considerations. The Settlement Council of Australia will be making a fuller submission in relation to the broader Workforce Australia program in the coming months.

The Settlement Council of Australia is the peak body for migrant and refugee services. We have 115 member organisations nationally, the majority of which deliver settlement services funded by the Department of Home Affairs. Our network also includes a number of small, volunteer based ethno-specific associations. Several of our member organisations deliver Workforce Australia services and the ParentsNext program. Our network includes a broad base of people with a mix of lived experience and professional insight with a great deal of overlap between the two as migrants and refugees make up the majority of the settlement sector workforce.

General comments on ParentsNext as relating to migrant and refugee women

The overall policy intent of the ParentsNext program is generally sound. However, the policy framework should include a stronger recognition that caring responsibilities are work (albeit, unpaid work). The value of unpaid caring work may be more strongly valued in particular cultures, and this can be undermined by the current policy framework of ParentsNext. Nonetheless, parents of young children do require a different and more flexible engagement than is presently available through the Workforce Australia system.

The primary challenges of the ParentsNext program relate to the Targeted Compliance Framework (TCF). We make the following observations in relation to the TCF:

- The TCF should have greater flexibility. We understand that there was a greater level of flexibility in the trial that preceded the current program.
- There should be no compulsory engagement before the youngest child is 2 years old ideally, and certainly no sooner than when the youngest child is 1 year old. This aligns with the average period of parental leave, noting cultural norms may mean this is longer for many migrant and refugee women.
- Anecdotally, there appears to be a lack of consistency in how discretion is applied, and providers may be able to provide greater flexibility than is afforded to many women.
- While greater flexibility and discretion is required, there should be a limit on the gravity of consequences allowed to eventuate recognising that the workforce has limited cultural competence and case management qualifications. We note that while there are a small handful of providers that deliver ParentsNext alongside services for migrants and refugees and therefore can be particularly responsive, the majority of

migrant and refugee women engaging with the program are not referred to such providers.

Should compulsory engagement remain a feature of the program?

The challenges outlined above in relation to the TCF lead to the question of whether compulsory engagement should remain a feature of the program. It has been put to SCOA that removing compulsory engagement would result in missed opportunities to engage with many migrant and refugee women who otherwise would not engage in the program. This is certainly true – there are many migrant and refugee women who otherwise would not engage and for whom compulsory engagement has led to a positive outcome.

However, the potential benefit of engagement needs to be weighed against the potential harms, many of which have been extensively outlined in other submissions. The likelihood of a positive outcome is dependent on the skills and responsiveness of the workers delivering the service. This can be highly variable. For migrant and refugee women the likelihood of a mainstream provider not being responsive to their needs is even higher.

Viewed in this light, compulsory engagement may not be proportionate given the harms experienced by many women. However, if compulsory engagement with ParentsNext were to be replaced with compulsory engagement with the main Workforce Australia system, this would be an even worse outcome for parents, as this would result in an even less flexible and more punitive approach.

Ideally, the ParentsNext program would adopt a more flexible approach. This could include requiring compulsory engagement for an initial appointment (or the first several appointments), leaving the discretion with the individual participant from that point forward to assess whether engagement in the program is of benefit to them. Guidelines on the exercise of discretion could also be adopted with a greater weighting on flexibility and being more understanding of competing priorities.

ParentsNext, DFV and migrant and refugee women

I note there has been some discussion of the ParentsNext program being a useful DFV intervention, particularly for migrant and refugee women. The program is not fit for purpose as a DFV intervention. If the policy intent is to address DFV, then there are a wide range of evidence-based interventions to address DFV in migrant and refugee communities that have yet to be funded and supported which are more worthy of investment. For example, there is ample evidence supporting the need for ethnic and faith communities to be better equipped to respond to disclosures of violence, given they are common sites of disclosure (likely more common than employment service providers). Investing in ParentsNext as a response to DFV would be a less effective mechanism than investing in other gaps in the DFV response system.

Importantly, it is critical to recognise that if a woman is in a violent relationship, compulsory engagement in ParentsNext does not end the violence. Nor does engaging in education or obtaining employment. If the woman remains in the violent relationship, the partner may continue to be violent, and may turn to financial abuse and control if she starts earning an income. At the same time, the abusive partner may not take on any of the caring responsibilities, leaving the woman worse off – she is having to work without benefitting from the income, while also taking on all the same caring responsibilities.

Another scenario is that the partner may still prevent engagement with ParentsNext despite the compulsory engagement. If this results in having payments suspended, the woman is effectively punished for the actions of the abusive partner.

In these scenarios, and others, the compliance framework does not support a woman to leave a violent relationship, rather it replaces one form of coercion and control with another.

This is not to say that ParentsNext cannot make a positive contribution towards addressing DFV in society. The primary usefulness of ParentsNext in relation to DFV is two-fold. First, its general contribution to improving gender equality by increasing access to employment. Access to an independent income provides women experiencing DFV with more choices and options.

Second, ParentsNext can be a point of contact for violence to be either disclosed actively by the participant, or otherwise identified by the provider. This is a secondary and incidental function in the same way as many other social programs have this function.

For migrant and refugee women, active disclosures are less common. Identifying violence requires particular skills, strong rapport, and a high level of cultural competence. The absence of this can lead to no response, or a harmful response to a disclosure of violence. There is extensive literature on the need for cultural responsiveness to ensure migrant and refugee women benefit from opportunities to disclose violence. In light of this, access to culturally tailored ParentsNext services is a prerequisite for realising this secondary function.

I hope the above assists the Committee in its inquiry. Should you wish to discuss these matters further, you can contact me at sandra.wright@scoa.org.au or on (02) 6282 8515.

Your sincerely,

A handwritten signature in black ink, appearing to read 'Sandra Elhelw Wright', with a stylized flourish at the end.

Sandra Elhelw Wright
Chief Executive Officer