



DEPARTMENT OF HOME AFFAIRS – COMMONWEALTH COORDINATOR-GENERAL FOR MIGRANT SERVICES

NEXT STEPS TO IMPROVE AUSTRALIA'S SETTLEMENT AND INTEGRATION OF REFUGEES

The National Refugee-led Advisory and Advocacy Group (NRAAG) is a refugee-led entity that aims to create spaces, platforms and strong voices led by former refugees, people from refugee-like backgrounds and people seeking asylum in key decision-making tables, policy, public and media discourse. NRAAG aims to inform key policies, service delivery, campaigns, research, and key initiatives affecting the lives of its constituents with a range of partners and allies. NRAAG's steering committee is composed of highly engaged individuals who are connectors, drivers and experienced in leadership, advocacy, and policy.

The Refugee Council of Australia (RCOA) is the national umbrella body for refugees, people seeking asylum and the organisations and individuals who work with them, representing over 180 organisations. RCOA promotes the adoption of humane, lawful and constructive policies by governments and communities in Australia and internationally towards refugees, people seeking asylum and humanitarian entrants. RCOA consults regularly with its members, community leaders and people from refugee backgrounds, and this submission is informed by their views.

NRAAG and RCOA are pleased to share this joint submission to the Department of Home Affairs discussion paper on Next Steps to Improve Australia's Settlement and Integration of Refugees. The end of the current tender allows the Australian Government to re-design settlement services in order to achieve a holistic and integrated system. Settlement services need to be redesigned to be holistic, flexible, and able to be tailored to the individual needs of participants. Red-tape and unnecessary reporting obligations need to be reformed, in favour of an approach which trusts the expertise of settlement services, and measures successful settlement outcomes, rather than discreet tasks.

The vital role that refugee-led organisations play in the settlement journey needs to be recognised, supported and funded. Specific funding should be set aside to strengthen refugee-led organisations and to support the work they do. Likewise, further funding should be provided to enhance wider community involvement in the settlement journey in order to increase community awareness and support for the humanitarian program and achieve better integration outcomes.

Housing is currently facing a nationwide crisis, with newly arrived refugee communities hit hardest. We need to develop urgent and innovative responses to this crisis in order to support newly arrived communities into sustainable long-term accommodation. Health support is also vital, with people with complex health needs not being given adequate funded settlement support in order to address on-arrival issues and link in with mainstream health services. The complexity of our health system means that newly arrived refugees need support to navigate this system.

Finally, our submission reflects on the experience of the Afghan evacuation and subsequent settlement process, and highlights some lessons learnt for going forward. Together, these issues demonstrate a need to ensure long term, flexible and individualised funding for the refugee support sector to best meet the diverse needs of newly arrived refugee communities.

1 Opportunity for a new settlement services review

- 1.1 The upcoming re-tendering process allows the Department of Home Affairs to re-design settlement services in order to achieve a holistic and integrated framework across all programs. The current model has developed through a range of overlapping programs, without a clear and broad overarching framework. Settlement is a complex, multi-faceted and non-linear process. The needs and support of new arrivals will vary widely. A new settlement system will recognise diverse and individualised services that address the unique needs of new arrivals.
- 1.2 In particular, the following principles are key for developing the next iteration of Australian settlement services, as outlined by the Settlement Council of Australia:
 - A person- centred approach which recognises individual experiences and needs, as well as family and community connections;
 - Needs-based eligibility where migrants and refugees can receive settlement support if they need it, regardless of visa or the length of time they have been in Australia;
 - A flexible model that recognises no two settlement journeys are the same, and trusts the individual service user together with their settlement worker to make sound decisions about the best way to support their settlement journey.
- 1.3 As such, we recommend that the Department of Home Affairs take this opportunity to further develop a new settlement program system, in consultation and co-design with settlement services, refugee-led and community based organisations and peak bodies.

Recommendation 1 The Department of Home Affairs undertake a consultation and co-design process to re-design settlement services in Australia

The Department of Home Affairs should consult with and develop a co-design process with settlement services, refugee-led and community based organisations and peak bodies to re-design settlement services in Australia to better meet the needs of refugee communities.

2 Role of refugee organisations in delivering settlement support

- 2.1 Refugee-led community organisations have an important role in supporting the successful settlement of humanitarian entrants and providing culturally appropriate assistance to people seeking asylum and refugees. This important work is often done in a voluntary capacity and may not be visible to those outside the community. Whilst the structures, purpose and activities of refugee-led organisations vary across and within communities, there are several similarities. We define a refugee-led community organisation as any group, association or structure that is created by refugee and humanitarian entrants for the benefit of their own self-defined cultural community. In this way, they are different from settlement services that are formed to provide social services for refugee communities, although the two may not be mutually exclusive.¹
- 2.2 Refugee led organisations have a unique understanding of the culture, heritage and challenges their community members experience in Australia. During recent consultations with refugee communities, we heard many examples of how refugee led organisations were first responders, mobilising their deep community networks to find solutions to key settlement challenges such as employment and housing. One example given was of the support the Afghan community in western Sydney provided to recent evacuees from Afghanistan. Despite

¹ The Strength Within: The role of refugee community organisation in settlement, (2014)
https://www.refugeecouncil.org.au/wp-content/uploads/2018/12/1405_StrengthWithin_accessible.pdf

their efforts, settlement providers were experiencing challenges finding longer term accommodation for the new arrivals. These challenges included high rental prices, lack of housing stock in the preferred suburbs and landlords unwilling to rent their property to tenants without a rental history. Housing was found immediately following an announcement made by a refugee led Afghan organisation to its networks. Lease negotiations were then completed by the settlement provider.

...We give them food, we find them accommodation, find them jobs. We did an announcement to the community with three major needs. ..So what we did (with the) announcement with the community if you have a property for rent, please let us know, and we will organise through that and we can do a contract for six months or three months. And if you're not happy, you can change that. But for at least for the first three, six months, you know, be flexible, and if you can, also give discount. So we found (a home for) so many people through that.

- 2.3 A similar approach was used to find employment for recently evacuated Afghan arrivals. In addition, employers from the community understood that their new employees would not have a car, so organised for a colleague to take them to work each day. These are just two examples of how the knowledge and motivations of refugee communities contribute to finding solutions to the diverse challenges their communities face. It also demonstrates how these organisations work alongside funded settlement providers and complement their work.
- 2.4 The past 2 years of the coronavirus pandemic has shown that the connections within culturally diverse communities enable them to communicate effectively with their own communities. This effective communication goes beyond language, and includes understanding of the audience, the cultural norms, communication platforms to utilise and direct access to networks to collect and disseminate information and resources. The existing structures within these communities are easily mobilised to provide psychosocial and practical support that enhances settlement outcomes.
- 2.5 Refugee-led organisations are often volunteer run and reliant on small grants or donations to fund their operations. Despite their significant role, few receive core funding for their work. Instead, they are often recipients of small project-based grants which at times do not cover all the project expenses. A service provider at a recent consultation noted the inequity in financial resourcing of refugee-led organisations and funded services

... refugee community organisations play an important role in resettlement and (that) large organisations... can't do our work alone. And we can't expect community leaders and community volunteers to pick up the slack while we are being paid for the work that we do here.

- 2.6 Larger funded organisations cannot work alone, they need to work side by side with refugee-led organisations to support the psychosocial wellbeing of humanitarian entrants. In addition, refugee led organisations play an important role in building trust and acting as a bridge to mainstream services. Their understanding of the cultural context, ability to communicate in language and access in both formal and informal settings supports the building of trust and use of services.
- 2.7 Participants in consultations hosted by RCOA and NRAAG stressed the importance of resourcing refugee-led organisations. This investment should include the allocation of a portion of the SETS funding to refugee-led organisations following a competitive application process. This would support and further enable their unique role and ensures that refugee led

organisations are properly resourced for their work. Moreover, it also recognises that lived refugee experience contributes to effective programs and service delivery.²

- 2.8 A commitment to enhancing the capacity of these organisations (if needed) to deliver services should also be included in the funding. Capacity strengthening support in the form of mentoring and training will ensure refugee led organisations are prepared and positioned as equal partners in settlement support. This also supports changing the narrative of refugees being seen as clients or beneficiaries of aid and support only to being viewed and acknowledged as service providers and leaders as well.
- 2.9 Further, the importance of maintaining the independence of refugee-led organisations in settlement support was stressed in recent consultations. Consultation participants sighted multiple examples of unsuccessful partnerships with larger service providers. They stressed the importance of independent mentoring by organisations who are not competing for the same funding.

Meaningful Refugee Participation in Settlement Services

- 2.10 In 2019, the Australian Government became a signatory to the Refugee Participation Pledge. As a signatory, it agreed to proactively work towards meaningful inclusion of refugees in decision making processes. The pledge defines meaningful participation as:

*When refugees — regardless of location, legal recognition, gender, identity and demographics — **are prepared for and participating in fora and processes where strategies are being developed and/or decisions are being made** (including at local, national, regional, and global levels, and especially when they facilitate interactions with host states, donors, or other influential bodies), in a manner that is ethical, sustained, safe, and supported financially.³*

- 2.11 The Refugee Participation Pledge was developed by the 'Global Refugee-led Network, a coalition of refugee led constituencies in North America, Latin America, Europe, Africa, Middle East and North Africa. It was developed in response to the lack of engagement and involvement of refugees in strategising, funding and implementation of policies and programs that influence their lives.
- 2.12 There is a need for the government to develop and implement concrete actions that reflect its commitments in the Refugee Participation Pledge. Barriers to meaningful inclusion of lived refugee experience in the strategic, funding, implementation and review processes of settlement programs must be removed. Inclusion must go beyond consultation and include representation and access to at strategic levels.

² Global Refugee-led Network, Meaningful refugee participation as transformative leadership: Guidelines for concrete action, 2019.

³ Global Refugee-led Network, Meaningful refugee participation as transformative leadership: Guidelines for concrete action, 2019, page 7

Recommendation 2 Set aside specific and adequate funding for refugee-led organisations

The Department of Home Affairs should set aside a specific funding pool for refugee led organisations to apply for delivery of settlement support programs. Only refugee led organisations should be eligible to apply for this funding.

Recommendation 3 Fund capacity strengthening for refugee-led organisations

The Department of Home Affairs should fund independent capacity strengthening support for refugee led organisations to support their delivery of settlement services.

Recommendation 4 Enact the Refugee Participation Pledge

The Department of Home Affairs should enact the Refugee Participation Pledge to ensure refugees are meaningfully engaged in the development, delivery and review of settlement policy and services.

3 The need for an individualised and flexible settlement program

- 3.1 A key recommendation many in the refugee sector have been highlighting for years is the need to ensure settlement services are flexible in order to cater for the individual and specific needs of newly arrived refugees. The current funding model requiring multiple funding points for KPIs has turned settlement services into a checkbox activity, rather than address to the unique circumstances of each individual.
- 3.2 Settlement services need to be redesigned to be holistic, flexible, and able to be tailored to the individual needs of participants by adopting a person centered approach. Some individuals may arrive with high level of English language ability and education, and therefore able to enter to workforce easily. Others may need a lot more time and support. Settlement contracts need to recognise this. This can be achieved by increasing flexibility in contracts to response to the unique needs of individuals, families and communities. This would also see red tape removed by doing away with the 'checkbox' approach to contracts and instead focusing on client goals and outcomes.
- 3.3 To this end, time limits to access settlement services need to be removed, recognising that the settlement process is a journey, and many people may need support beyond the current program time limits. While many people may not need such long-term support, others may need more. Settlement services should be trusted and funded to provide the support which is needed, rather than being restrained by existing limits. As such, settlement services should be provided on a needs-basis, rather than a strict time limit.
- 3.4 This would see HSP services continue passed the current 18-month time limit, and SETS continue beyond the current five-year time limit. However, it would also mean that those who no longer need support may have the discretion to exit the program quicker. This also does not necessarily mean that additional resources may be required to assist people for longer. For example, some new arrivals may just need more time to settle into Australia life before they start fully engaging with some services, and others may need support on a more discreet basis. This means that people may engage with settlement services during different parts of their settlement journey, with various levels of intensity. As settlement services move towards an individual needs-based approach, case workers will be able to assist people according to their own individual journey and timeline.
- 3.5 Likewise, visa criteria is also an arbitrary category which is does not recognise that refugees may arrive in Australia via a variety of visa pathways. For example, many refugees utilise the Partner, Orphan Relative and Parent Visas to come to Australia. Others may arrive on skilled visas or student visas. Other still, as we have seen with the response to the Ukrainian Crisis,

may enter of Visitor Visas. The restriction of settlement services to those holding a humanitarian visa leaves those who are refugees without vital support, and undermines successful settlement and integration outcomes. Eligibility should be expanded to all people from a refugee background, regardless of visa subclass. Settlement services are able to assess whether someone on a non-humanitarian visa would be of a refugee background via a short interview. This should equally apply to refugees and people seeking asylum who are on bridging visas, in community detention, or who do not currently hold a visa.

- 3.6 Finally, the type of settlement support services provided to individuals needs to be flexible, to respond to the unique needs of each individual. The current restrictions on the type of support that some programs are able to provide does not serve the policy goal of providing holistic and needs-based support. For example, one service provider highlighted how they are not able to provide employment support under SETS, as this was the responsibility of Jobactive – even though the current provider in their area did not adequately support newly arrived communities (an issue we have heard across the country):

In SETS contracts we're not allowed to duplicate services of a jobactive, but our clients don't get appropriate services from a job active like they don't get access to an interpreter... The jobactive services operate on a system where they're paid per employment placement. So, if they've got a person that's got a lot of barriers to employment, like a refugee who's got some mental health concerns, health issues, language barriers, they tend not to provide them with the support that they would give to somebody else because they think they're going to get this person into a job a lot easier than they will this person. So this person is neglected. Many times, they're not given access to an interpreter. So what chance have they got when they go to a jobactive? So why not give more resources to SETS so that they can actually provide employment services for newly arrived community members?

Recommendation 5 Remove time limit of access to settlement services, in favour of a needs-based approach

Eligibility for settlement services should not be bound by a time limit, but instead assessed on a need-based approach. This would see HSP services extend based the current 18 months, and SETS be extended passed the five-year time limit.

Recommendation 6 Extend eligibility to all people with refugee backgrounds

Eligibility for settlement services should be extended to all people from a refugee background, regardless of their visa status or visa subclass.

Recommendation 7 Broaden the types of support that settlement services provide to enable bespoke and individualised support

Funding for settlement services should be broadened to include a variety of settlement supports that newly arrived refugees need, to ensure settlement services can provide individualised and bespoke support on a needs-basis.

4 Ensuring sustainable and consistent funding

- 4.1 The COVID-19 pandemic highlighted longstanding issues with funding for settlement services. The border restrictions imposed due to the pandemic saw significant reductions in the arrival of humanitarian entrants. This had a significant impact on the sustainability of settlement services, which are paid on a fee-for-service arrangement. Without new arrivals, settlement services were not paid, and had to reduce staffing and other resources. This resulted in the

loss of experienced and long-term staff, many of whom had to find employment outside the sector.

- 4.2 This created a number of issues when settlement services were expected to suddenly increase capacity in order to respond to the emergency evacuation of people from Afghanistan. Further resources and additional time was needed to recruit and train new staff, after qualified and experienced staff were made redundant only months before. As one service provider recently explained:

The other thing I think with HSP is that, especially using the example of Afghans and the Ukrainians, is that we don't get enough notice provided to us to prepare for arrivals. So it appears as if HSP providers are not responding to the needs of refugees, especially as we are face of the programme. But in reality, we haven't had any lead time. COVID exacerbated that... A lot of providers actually had to let go of their staff... So our capacity to respond quickly becomes quite challenging.

- 4.3 This experience highlights the need to ensure ongoing, long-term funding for settlement services in order to remain sustainable and viable, and be able to respond to fluctuations in settlement numbers, including being able to ramp up in response to emergency circumstances.
- 4.4 As emphasised by SCOA, long-term funding, tied to clear longer-term outcomes and an annual planning process is needed to ensure sustainability of the sector. It is also about trusting experienced settlement services to provide the type of support that is needed, rather than opting for a check-box type KPI model which created unnecessary red tape. This not only recognises the expertise and experience of settlement services, but also allows for an individualised approach to settlement services (discussed above).
- 4.5 RCOA has also previously raised the ongoing issue of competitive tendering in settlement services, which has required skilled and experienced settlement services to compete with each other for funding. This often leads to organisations or consortiums having to compete to provide the cheapest program, resulting in reduced services for refugee communities. Rather than a competitive tendering process, the Department should consider ways to ensure long-standing and experienced settlement services are funded. As one service provider noted:

[The tendering process] is really inefficient for because it was quite a lengthy process to put together the application to spend all those months coming up with ideas about what you would kind of support we would do, negotiating, developing a budget... Where if the government did come along and said, 'okay, we've identified a need in this area. We've got this amount of money. We're going to work with all of you service providers to deliver this service. Let's come up with an idea together rather than this competitive process that creates so much of inefficiency. It's a waste and it doesn't enable us to learn either from existing programs

- 4.6 Furthermore, funding should be re-aligned to measure settlement outcomes, rather than the current check-list type approach. Funding should be commensurate with the outcomes expected of providers and allow providers to service the full extent of needs in their local areas. Current funding levels are inadequate to achieve sustainable long-term settlement outcomes. As recommended by SCOA, reporting should be tied to meaningful outcomes and data indicators, based on consultation with migrant and refugee communities and service providers, and reporting burdens should be proportionate to service delivery work. The current system of reporting is overly complex, tedious, and time-consuming, which takes away resources from actually support clients. As one settlement service recently noted:

[SETS] has a system of scoring and you have to score each client based on the needs they've presented. And if those needs have been met and the scoring is done through satisfaction goals met...That scoring we have to do every two months to ensure we have all clients scored by end of six months. So that is time consuming for our case officers. Yeah, they have to be scoring every eight weeks.

- 4.7 Funding should be re-designed to reduce this red tape, and instead trust and support settlement services to do what is best for the community.

Recommendation 8 Ensure long-term sustainable funding for the sector

Funding for settlement services should be re-designed to provide ongoing, sustainable and long term contracts which give settlement services the ability to plan for and respond to emerging issues, and allow experienced and skilled staff to be retained.

5 Improving communication and co-ordination

- 5.1 A key area for improvement is the need to improve communication and co-ordination between services and governments, especially co-ordination across federal, state and local services. For example, local councils and state services need to be informed on incoming settlement numbers in advance to ensure adequate planning levels. This has been an issue which RCOA has been raising for years, but has been exacerbated with recent arrivals from Afghanistan and Ukraine.
- 5.2 Likewise, communication to settlement services and other services also needs to be improved. Information from DHA needs to be better communicated to services in a timely way, so that appropriate coordination for participants can be planned. This needs to happen on a participant/family level, so that adequate supports can be arranged before a person arrives, and on a local area level, so that the community can prepare and ensure adequate services before new arrivals settle in these areas.
- 5.3 The Department needs to ensure that communication is provided well in advance to local services across a range of areas so that staffing and resources can be prepared in advance.

Recommendation 9 Ensure timely and effective communication

The Department of Home Affairs should improve communication to settlement services, local council, states and other community services about settlement planning and arrivals, to ensure timely delivery of services on arrival.

6 Rural and regional settlement

- 6.1 In the past decade, the Federal Government has directed the settlement of refugees and humanitarian entrants in regional areas, especially those without family links in metropolitan areas. This policy has considerably increased the proportion of humanitarian entrants settled directly in regional areas, from 6% in 2001 to 14% in 2011,⁴ and then to 38.6% in the 2019-20 financial year.⁵

⁴ Feist, H. Tan, G. McDougall, K. Hugo, Graeme. (2014). *Enabling Rural Migrant Settlement: A Case Study of the Limestone Coast*. Hugo Centre for Migration and Population Research, available to download here, page 8.

⁵ Department of Home Affairs (2021), *Discussion Paper: Australia's Humanitarian Program 2021-22*, <https://www.homeaffairs.gov.au/reports-and-pubs/files/2021-22-discussion-paper.pdf>, p.6.

- 6.2 RCOA has had a longstanding focus on regional settlement of refugees and over the past few years, undertook research on regional mobility, including direct refugee settlement and secondary movement of refugees to regional areas. From 2017 to 2019, we conducted multiple consultations with service providers and refugee communities in regional areas across Australia to understand the factors that need to be considered to achieve successful settlement.
- 6.3 Suitable employment opportunities and housing affordability were two of the key factors people nominated as contributing to the retention of refugees in some of the regional locations, as well as the reasons for secondary migration from metropolitan areas.
- 6.4 Conversely, the reasons why some regional areas fail to attract or retain a refugee population include a lack of proper infrastructure and services (especially in the areas of education and physical/mental health), isolation, and the absence of a welcoming and inclusive environment. While some refugees might continue to live in those areas despite these challenges and because of employment, these factors mean the regional areas will fail to retain this population when the employment opportunities decline.
- 6.5 These findings and observations clearly show the importance of a place-based approach to refugee settlement in regional areas. Once a regional location has been identified as a primary settlement location, its suitability needs to be constantly reviewed, as situations inevitably change. As part of this review, the advice of the settlement sector and regional communities, the local circumstances such as housing affordability, infrastructure, employment opportunities and their suitability, and support services need to be regularly monitored and evaluated. For example, extreme weather conditions such as drought or flooding may affect the availability of employment in areas such as agriculture, and housing affordability may change or health infrastructure in a community may deteriorate.
- 6.6 In the 2021-22 Humanitarian Program Discussion Paper, the Australian Government has reaffirmed its commitment to increasing regional settlement, creating a target of 50% of humanitarian entrants to be settled in a regional location by 2022.
- 6.7 However, this target and this commitment need to be considered in the context of the changed reality of many of traditional regional settlement locations. There has been significant population movements from metropolitan areas to some of these regional locations during the COVID-19 pandemic. This has affected the availability and affordability of rental accommodation in those areas. The return of more than 500,000 Australians since the start of pandemic may have also contributed to a decline in rental availability in some regional areas.
- 6.8 Our member organisations have highlighted issues related to accommodation costs and availability in regional areas as one of their most significant concerns. They reported that in Hobart and in parts of regional Victoria, the cost of rental accommodations has tripled and there are few housing vacancies.
- 6.9 Concerns were also raised about the service capacity in some of the regional areas, as there have been no recent arrivals and the finalisation of older caseloads have resulted in a reduced capacity of the providers and their inability to quickly scale up. As the Federal Government has traditionally focused on settling 'unlinked' refugees in regional areas (those without an identified family link in a metropolitan area), the capacity of service providers to support them in navigating life in Australia is of added importance.
- 6.10 The concerns relayed to RCOA and NRAAG about the cost and availability of accommodation have also been reflected in media reports and published research in recent months.

6.11 In its most recent Rental Affordability Snapshot, based on a survey of over 74,000 listings, Anglicare Australia concludes that compared to 2020, every single household type is worse off as the rental prices across Australia continue to rise. The report found that 0%, or just three rentals, are affordable for a single person on a JobSeeker payment. For a couple living on the Age Pension, only 2% of rentals were affordable.⁶ The report highlights the challenges in regional Australia, stating:

The Snapshot shows that affordability in regional areas has crashed over the past year, challenging the myth that country areas offer an affordable reprieve from the city. It seems that people flocked to regional areas when they had the opportunity to work flexibly, putting unprecedented pressure on regional housing markets. ...and each of the regional areas we surveyed saw dramatic declines in the number of listings overall.⁷

6.12 Research from National Housing Finance and Investment Corporation published in April 2021 but with data up to June 2020 shows that rental affordability in Hobart is similar to Sydney, with both cities not having any affordable rental accommodation for the bottom 40% of income earners.⁸ Indications are that the housing situation in Hobart has deteriorated further since June 2020. The situation is the same in some other regional settlement locations like the Gold Coast or Coffs Harbour, where a vacancy rate of 0.5%⁹ in both towns is driving up the cost of rent.

6.13 We still believes that, if they are well-supported, refugees settling in regional Australia can bring about economic, social and cultural benefits to the area. With a higher percentage of working age people than other migrant groups and higher birth rates, refugees can reinvigorate regional areas. They have a strong sense of community engagement and can improve the quality of life for those in regional areas. Multiple successful examples of regional settlement support this. However, the above challenges highlight the importance of an ongoing review of the suitability of those locations as local situations change.

6.14 The challenges relating to housing availability and service capacity have not affected all regional areas equally. The Government must undertake an urgent review of the regional settlement locations to assess the changes and pause the settlement of refugees in areas that are facing significant challenges. As mentioned, the majority of the refugees settled in regional areas are unlinked and therefore, have weaker community support and connections. This makes it much harder for them to overcome complex challenges that have even overwhelmed those who fully understand the Australian housing market.

⁶ Anglicare Australia (2021), *Rental Affordability Snapshot*, <https://www.anglicare.asn.au/docs/default-source/default-document-library/rental-affordability-snapshot---national-report.pdf?sfvrsn=8> , pp.4-9.

⁷ Anglicare Australia (2021), 9.

⁸ National Housing Finance and Investment Corporation (2021), *Housing inSITES: Capital city housing affordability for renters and potential first home buyers*, <https://www.nhfc.gov.au/research/researchreport/housing-affordability/housing-insites-capital-city-housing-affordability-for-renters-and-potential-first-home-buyers/>

⁹ Claudia Jambor, Luisa Rubbo, and Melissa Martin, 'Rising house prices, tight rental market sign of 'new renaissance' for regions, NSW Deputy Premier says' *ABC News* (24 February 2021), <https://www.abc.net.au/news/2021-02-24/regional-nsw-housing-crisis-champagne-problem-john-barilaro-says/13186852>; Dominic Cansdale, 'Gold Coast crisis accommodation in shortage due to 'absolutely crazy' rental market' *ABC News* (12 February 2021), <https://www.abc.net.au/news/2021-02-12/gold-coast-rental-market-overwhelms-crisis-accommodation/13140710>

Recommendation 10 **Urgently review the regional settlement locations**

The Department of Home Affairs should conduct an urgent review of the current regional settlement locations in consultation with the settlement sector. This review should assess whether those locations still have the factors to achieve successful settlement, including housing affordability and service capacity.

7 Safe, affordable and appropriate housing

- 7.1 Securing safe, affordable and appropriate short-term and long-term accommodation is one of the biggest challenges of the settlement sector at the moment. Lack of affordable and appropriate housing is affecting all Australians across the country but the situation can be much more challenging for refugees and the settlement service providers who support them. Newly arrived refugees have no rental history in Australia and are often in unsecure and low-paid employment or still reliant on income support, factors that create major disadvantages for them in the current competitive rental market.
- 7.2 Service providers who spoke to RCOA, put the issues related to housing into two categories: on-arrival accommodation and long-term accommodation. These categories are interlinked as difficulties in securing long-term accommodation result in refugees needing to stay in scarce and expensive on-arrival accommodation longer, further reducing the supply of available short-term accommodation for the next arrival group. Many service providers told us that most of the resources of their housing teams are spent on securing and maintaining on-arrival accommodation, leaving them with very little time to meaningfully assist refugees in securing safe and appropriate long-term accommodation.

On-arrival accommodation

- 7.3 Securing on-arrival accommodation is a major challenge for settlement service providers. Prior to the COVID-19 pandemic, many services had a stock of properties that they would use to house new arrivals until they secured long-term accommodation. When the COVID-19 pandemic led to border closures and brought the arrival of refugees to a halt, maintaining such stock became unsustainable. Long-established relationships with real estate agents and accommodation providers were also lost due to the loss of staff and lack of contact with those stakeholders in that period.
- 7.4 The recent increase in the number of refugees and humanitarian entrants due to the re-opening of borders and the arrival of people evacuated from Afghanistan, resulted in a significant demand for on-arrival accommodation. This demand in many cases was unforeseen and therefore preparatory work could not be done.
- 7.5 Re-creating a stock of properties to use as on-arrival accommodation not only takes time, it is highly challenging in the current market. Other options which are more reliable and sustainable in the long-term and perhaps more resilient to the periods of low demand, like purchasing and investing in properties, are considered too risky by many providers as the HSP contracts are currently too short to justify such investments.
- 7.6 As a result, many of the providers have resorted to using hotels for the purpose of on-arrival accommodation. Hotels are expensive, many are located in areas that are far from public transport and from where refugee communities live, they are restrictive and difficult to extend, they do not have proper amenities to foster independent living, and do not create any sense of safety or settlement. After all, hotels are places of transition.
- 7.7 And yet, in recent months, more and more people have had to stay in hotels for longer than a transition period. We have heard of many families that have been unable to transition to a long-

term accommodation within the contracted 28 days. One refugee community member told RCOA of a family of six from Afghanistan who have remained in a hotel in one of the major metropolitan cities for the past six months and are highly stressed as it has affected the schooling of their children and their capacity to feel any sense of settlement after a traumatic journey to Australia.

- 7.8 The rigidity of the transition period has added to these challenges. In the current fee for service model, settlement service providers would not easily get reimbursed for extended stay beyond 28 days. This means the cost of further stay in hotels would often have to be borne either by the providers or by refugees themselves, creating significant stress and challenges for both.

Long-term accommodation

- 7.9 In its most recent Rental Affordability Snapshot, Anglicare Australia highlights an unprecedented **30% drop** in the number of advertisements for rental homes. The national vacancy rate is now at the record low of one percent, half of an already low rate in 2021.¹⁰ Such significant drop in vacancy rate means it is even harder for low-income renters to access affordable housing.

They need to find an affordable home in a tight market, while competing with record numbers of people who can no longer afford to buy. This has led to a market that has never been less affordable. Renters on low incomes are bearing the brunt of the tightening of the market because they are forced to compete with people on higher incomes and more stable jobs for the scarce supply of new rental homes that become available.¹¹

- 7.10 Anglicare Australia found that out of 45,000 listings nationwide, 0%, or just five rentals, were affordable for a single person on a JobSeeker payment. For a single parent with one child over the age of eight, this number was again 0% or nine rentals (down from 44 in 2021).¹²
- 7.11 Furthermore, availability and affordability of accommodation in some of the desired areas for settlement, for example areas where there is a larger community network, can be even lower than the national average. The situation is more difficult for refugees with larger families. Some of the refugees who spoke to us also reported that they believed bias and prejudice played a part in their applications being overlooked by real estate agents or landlords. In the past some of the refugees who chose to move to regional areas, nominated housing affordability as one of the reasons for their move. As we elaborated above, this is no longer the case in many of the regional locations due to an increased movement of people from capital cities to these areas during the pandemic.
- 7.12 It should also be noted that for some refugees the challenges associated with securing long-term accommodation are not limited to the availability and affordability of housing. Poor digital literacy and limited English language competency can significantly disadvantage refugees in securing a rental property. Navigating the process of property inspection (often along with a number of other prospective tenants) and submitting applications, and securing references without previous rental history in Australia, can be daunting, even with support. Further, understanding the legal contracts and rights and responsibilities of a tenant are other challenges that require support. When most of the resources of settlement services housing

¹⁰ Anglicare Australia (2022), *Rental Affordability Snapshot*, <https://www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf>, p.4.

¹¹ Ibid, p.4.

¹² Ibid, p.7.

teams are taken up by the challenges of securing on-arrival accommodation (as we explained earlier), there is rarely enough staff time left to properly assist the refugees with these issues.

Impacts of housing insecurity

They are the most vulnerable cohort that we have, who have to gain competency around ten settlement topics within an 18 month period. When the pressures of lack of housing plus the cost of housing come into play, it does affect their capacity to engage in other things that may be considered as less critical but are in fact vital to people's successful settlement.

-Service provider in conversation with RCOA

- 7.13 Lack of access to secure housing delays successful settlement. When people are worried about securing a place to live in, they cannot focus on education, employment, or learning English. Focus on health and getting comprehensive health assessments are delayed and being linked with a local healthcare provider is not possible. As the case we referred to earlier demonstrated, remaining in short-term accommodation and not being able to secure long-term housing, affect children's schooling and delay enrolments.
- 7.14 Housing insecurity can also negatively affect mental health. It can create anxiety, isolation, and delay engagements with mental health providers. Many members of refugee communities told us that they or their friends had no option but to share a house with a few other people to be able to afford the rent. This is particularly the case for those who are single or for couples without children as they receive much lower income support. Living in overcrowded housing can negatively affect physical and mental health. One former refugee told RCOA and NRAAG that living in shared accommodation is particularly difficult and at times unsafe for LGBTIQ+ refugees. It has resulted in situations when the person is forced to face homelessness to remove themselves from unsafe situations; incidents that have been highly re-traumatising for refugees who had left home countries due to persecution because of their sexual orientation and/or gender identity.

Ways forward

- 7.15 Addressing the issue of housing affordability in Australia requires vision, policy shifts and new ways of thinking. As Anglicare Australia highlights in its Snapshot Report, measures like increasing the rate of social security payments, reforming Rent Assistance, strengthening rental laws and ending unfair rent increases, and protecting the National Rental Affordability Scheme (NRAS), are some of the ways to address this growing challenge.¹³
- 7.16 We support the Settlement Council of Australia (SCOA)'s call, in its 2022 Election Platform, that the Government needs to implement a national housing strategy that addresses all aspects of the housing system, including home ownership, private rental and social housing. This is a call that echoes the recommendations of colleagues in other sectors.¹⁴
- 7.17 We also agree with SCOA, Australian Council of Social Service (ACOSS),¹⁵ and Anglicare Australia¹⁶ that increasing the supply of social housing in Australia is urgently needed to reduce

¹³ Ibid, pp.12-15.

¹⁴ Settlement Council of Australia (2022), *2022 Election Platform*, <https://scoa.org.au/wp-content/uploads/2022/04/FINAL-ELECTION-DOC.pdf>, p.9.

¹⁵ Ibid.

¹⁶ Anglicare Australia (2022), *Rental Affordability Snapshot*, <https://www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf>, p.12.

the risk of homelessness for people on low income. We believe particular attention should be paid to enhance the access of refugee women, especially those who arrived on subclass 204 (Women at Risk) visas, and refugees with disability to social housing.

- 7.18 SCOA argues that stronger relationships between settlement service providers and real estate agents and landlords can significantly increase access to housing. Given the current pressure on the providers, this is only possible if more resources are allocated in the future contracts to strengthen the community engagement capacity of the services.¹⁷ The feedback RCOA and NRAAG received during our consultations with settlement service providers and refugee communities supported this recommendation. People also highlighted the important role of community leaders and community organisations not only in brokering relationships with housing providers but also in leveraging their own relationships with these stakeholders to increase access to housing.
- 7.19 The most recent example of this was the collective efforts of Afghan community leaders and community organisations in supporting service providers to secure long-term accommodation for refugees evacuated from Afghanistan. One community leader in Sydney told us:

Most people wanted to be in Cumberland and surrounding LGAs because that is where the community was and that is where they felt safe. And it was extremely difficult to find accommodation. So what we did, we made an announcement to the community that if you have a property for rent, please let us know, and we can do a contract for six months or three months. And if you're not happy, you can change that but at least for the first three, six months, you know, be flexible, and if you can also give discount. So we found houses for so many people through that. We still had to work with [service provider] as they needed to come and check and inspect and do the paperwork but being able to find the place, it made life a lot easier for the caseworkers.

- 7.20 Another member of a community organisation told us that over the years they developed good relationships with some of the real estate agents in their areas and were able to leverage those relationships.

I used to contact some of them daily to ask about new houses and explained why these people don't have rental history and how they are financially stable, or they can afford to provide rent given, you know, the allowance they have from the government. We provided a lot of education to the agents, did a lot of background work.

- 7.21 Almost all of the community leaders we spoke to were working on a voluntary basis and doing this work in addition to their full-time jobs and caring responsibilities. The interactions between them and service providers are currently ad hoc. There is significant value in properly acknowledging the social capital, relationships, and local knowledge of these community leaders. As we discussed in Section 2 on the role of community organisations in settlement services, their role should be properly acknowledged, strengthened and invested in. Having safeguards, defining roles and responsibilities and putting proper structures in place would go a long way in preserving such relationships.
- 7.22 One key point from many of the consultations with service providers was that there is an urgent need for addressing the current issues with securing on-arrival accommodation. Many of the service providers were of the belief that addressing this would help shift the resources and

¹⁷ Settlement Council of Australia (2022), *Key Messages - SCoA response to Discussion Paper on Next steps to improve Australia's settlement and integration of refugees*, p.4

focus to brokering longer term solutions to housing refugees and creating better understanding of the rental market and relationships with landlords and real estate agents.

7.23 Many of our colleagues in the sector have put forward practical solutions to address this issue. For example, in its submission, Settlement Services International (SSI) highlights that to address this challenge, providers need to be able to maintain a housing stock for the purpose of on-arrival support in environments of variable and changing levels of demand. However, to be able to do so and to be able to pursue other innovative approaches, the providers need longer term guarantee that can justify the investments. This can be achieved through longer term contracts, as discussed above.

7.24 There are also further recommendations put forward to help refugees access long-term accommodation. They include innovative approaches such as social enterprise model where rental contribution may be converted to purchasing a property or Build-Operate-Transfer (BOT) models.¹⁸ One recommendation we continue to suggest is the need to provide refugees with a subsidy in the first 12-24 months of their life in Australia if they rent privately. A measure that is in line with the affordable housing schemes. This will provide a 'buffer' period when the housing stress is less prominent so people can focus on settlement, addressing some of the immediate health issues, gaining employment and pursuing educational opportunities with the aim of being able to independently compete in the rental market at the end of this period.

Recommendation 11 Enhancing community engagement capacity of service providers

The Department should allocate more resources to strengthening the community engagement capacity of the providers. This will enable them to form stronger relationships with housing providers (such as real estate agents and landlords) and the community leaders with local knowledge and connections.

Recommendation 12 Working with service providers to address the current issues around on-arrival accommodation

The Department should engage directly with settlement service providers about ideas and ways to address the issue of the shortage of on-arrival accommodation and make necessary changes to the length and requirements of the contracts based on their feedback.

Recommendation 13 Providing refugees with subsidies to assist with the cost of private rental in the initial settlement period

Rental subsidies should be provided to the refugees who rent privately in the first 12-24 months of their settlement in Australia. This will give new arrivals more time to work towards successful settlement and better capacity to compete in the rental market at the end of the period.

8 Improving refugee health outcomes

8.1 Improving refugee health outcomes is integral to successful settlement. However, this issue should not be looked at in isolation. Many other aspects of settlement impact health outcomes. Housing insecurity, unsecure employment that is not in line with person's qualifications and aspirations, and social exclusion all can negatively affect refugees' health. Therefore, the interconnectedness of these factors should be considered in any future planning and prioritisation. To improve refugee health outcomes, we do not only need quality and specialised

¹⁸ Ibid.

healthcare, we also need safe and secure housing, meaningful employment, educational opportunities, and appropriate opportunities for civic engagement and social connection.

Impact of Australia's refugee policies on health outcomes

- 8.2 RCOA and NRAAG have been highlighting their key concerns with family reunion policies for many years. Long waiting periods, prohibitive costs, restrictive definition of 'family', and requirement for formal documents (that many refugees do not have or lost), all have resulted in protracted periods of family separation which adversely affects refugees mental health. Service providers continue to tell us about instances of declining mental health, inability to achieve successful settlement, family conflict, social isolation and suicidal ideations due to family separation. The particularly negative impacts of this issue on the health and wellbeing of young people have been repeatedly highlighted.
- 8.3 Australia's policies regarding family reunion are not the only policies that adversely affect refugees. There are unrealistic expectations that a newly arrived refugee should gain competency in a variety of key settlement areas within a maximum period of 18 months when they are on the HSP. This is while trying to secure safe and appropriate accommodation in an ever-competitive rental market. As mentioned before, these expectations not only create significant anxiety and stress but also can delay addressing pre-existing health issues. To address these challenges, settlement contracts need to be flexible and consider people's individual needs and settlement journeys.
- 8.4 Under the current policies, a significant number of refugees are eligible only for a small part of settlement support: the Specialised and Intensive Services (SIS). Refugees on Temporary Protection Visa (TPV), Safe Haven Enterprise Visa (SHEV), and the Permanent Protection Visa (PPV) are among this group. They often start accessing these services in much poorer physical and mental health, as prior to the grant of their visa, they had been subject to years of punitive policies.
- 8.5 While seeking asylum, this group experienced prolonged detention, protracted waiting periods, pressure to navigate a complex legal system often unsupported, and years of destitution. It is not uncommon for people who eventually receive these visas to have experienced homelessness, significant food insecurity, and lack of access to any support. RCOA is aware of and has documented examples of children with disability, single mothers, pregnant women, people with terminal cancer, and elderly people who were denied any support while they were seeking asylum. This includes denial of access to Status Resolution Support Services (SRSS) that is supposed to provide some casework and income support (89% of the Jobseeker rate) to people seeking asylum. However, over the past few years, the eligibility criteria for SRSS have become so restrictive that some of the most highly vulnerable people are left with no support. Furthermore, many of the people who later receive the above visas, especially those who are applying for the PPVs, do not have access to Medicare during the many years that they wait for the processing of their applications. That results in late diagnosis of health issues, chronic health concerns and lack of access to life saving medications.
- 8.6 It is not possible to meaningfully discuss improving refugee health outcomes while disregarding the impact of the current punitive policies on the health of a large group of refugees. When they finally become eligible for a small part of settlement support, they are already in poor physical and mental health. Many of them require complex support that they may not have needed if they were properly supported from the beginning.
- 8.7 The only way forward is that all refugees, irrespective of their visas, be eligible for the full suite of settlement support services. If we are serious about improving refugee health outcomes, we should be looking at the whole journey of refugees. While Australia cannot influence what happens to people while they are in transit, we can provide basic support to them while they

are seeking asylum in Australia. Therefore, when they are granted visas and eligible for settlement support services, they will be in better health and much more likely to achieve successful settlement outcomes.

Support for specific groups

- 8.8 To improve refugee health outcomes, the needs and support requirements of a few specific groups should be particularly examined. They include refugees with disability, refugee children and adolescents and elderly refugees, and LGBTIQ refugees.
- 8.9 The healthcare support needs of refugee children and adolescents include early intervention, mental health services with expertise in working with children and teenagers from refugee background, and health education.
- 8.10 We understands that expert health networks such as the Refugee Health Network of Australia (RHeaNA) are advocating for the inclusion of specific paediatric and adolescent refugee health services in all states and territories. They recommend that those services focus on comprehensive age appropriate care, management and follow up. We endorse this recommendation and agree that engagement with these services should be undertaken in parallel with strong and culturally competent primary care engagement.
- 8.11 A group that our consultation participants believed has been at times overlooked is the older refugee group. While there were some discussions about the importance of strong and culturally competent care that can address physical health needs of this population, many community members raised concerns about the mental health and social isolation of this group. One community member in Sydney told us of their concerns for older refugees who arrived in Australia after being evacuated from Afghanistan with their families. He explained:

Knowing the community deeply here in New South Wales, they are the members of the family who will suffer the most, because they have language barriers, and they will not be able to put that much effort to go and learn the language in the first place. And even if they do, it will be a challenging process for them. Maybe they won't even attempt that to get their driving licence. And you know, that means they can't independently drive around and get to places where they used to go to, for example to the mosque, not even on a daily basis, but on a weekly basis. They have suddenly lost all of their social networks and are in this new country. So, these people will be isolated, often not by choice. And the younger generation, they will get busy and move on with their education, or work and there will be not enough time to take care of older parents or grandparents properly and make sure they are not isolated.

- 8.12 Consultation participants recommended that more attention be paid to this group to reduce their social isolation, as such issue could lead to declining mental health. They recommended more targeted programs that involve older people in social and group settings. This is particularly important for people who arrive in Australia in more advanced ages compared to those who arrived here when they were younger and aged here. It is because the former group often struggles to connect to the wider community and have lost life-long social networks in their home countries in the space of a few months.
- 8.13 An example of a targeted program that can be replicated in other part of Australia, is STARTT's Older People in Cultural Transition (OPICT), a community development program that is based on STARTT's foundation program Families in Cultural Transition (FICT). OPICT is a group-based psychosocial program that helps older refugees learn new skills and information and

combat social isolation. It covers topics like healthy aging, grand parenting in a new country, home and community safety and enjoying the environment.¹⁹

- 8.14 Refugees arriving with a disability are also a key priority, and need much further support and specialised services. The current allocation of settlement services does not reflect the ongoing need of this community, especially recognising the support from arrival through to accessing the National Disability Insurance Scheme. Until newly arrived refugees with a disability have access to the NDIS, they need support from specialised settlement services to access a variety of services, equipment and supports. Unfortunately, there is still a significant gap in the sector for this support, and it has only been addressed with ad-hoc and local solutions, rather than systemic policy change and funding to ensure successful settlement of people with a disability. Further funding is needed to provide specialist settlement support to newly arrived refugees with a disability to assist, until they have been approved for NDIS and can then move to ongoing disability services under the national program. As one settlement service provider recently noted:

NDIS requires so much information to be able to assess the client. And that often just delays that process, because you'd have to refer them to a GP, the GP would have to then refer them to other specialists that are required to get the documentation to then have a strong case to put forward. But then the other challenges that the broader community faces once they're provided a package, if the package is then reviewed, if it's reduced. The secondary to that is NDIS Providers sometimes dealing with CALD client can be a bit challenging, especially the provision of interpreters so that the clients can fully understand what their package looks like, what is required of them. I think that falls on to the HSP provider.

- 8.15 Further, this is a growing gap in access to disability services for those who do not hold a permanent visa, including Afghan evacuees on a 449, and newly arrived people from Ukraine on temporary visas. As they are not eligible for NDIS, there is a significant need for support for this group. As one service provider noted:

An example would be the Afghan cohort, because they are on 449, if they arrived and they had a disability, they're not eligible for NDIS. If an elderly person arrived, they will not be eligible for My Aged Care until their visa is granted.

Recommendation 14 Undertake a review of settlement services for refugees with a disability

The Department of Home Affairs should undertake a review of the support that is provided to refugees with a disability to ensure there are no gaps between arrival and accessing the National Disability Insurance Scheme. Settlement services should be adequately funded to provide ongoing support until a person with a disability is able to access the NDIS.

Refugee Health providers

- 8.16 While in some states and territories, there is a strong refugee health service, those services vary across the country in terms of their structure, funding and processes. This has resulted in lack of consistency in how refugees access the health services that they need.

¹⁹ Sue Cunningham (2014), *Older People in Cultural Transition: A psychosocial approach to educating older refugees*, <https://www.culturaldiversity.com.au/documents/2014-conference/conference-presentations-2014/1075-sue-cunningham-older-people-in-cultural-transition/file>

- 8.17 Our consultation participants highlighted that across the country the role of refugee health providers needs to be more prominent in the settlement process and go beyond the initial health screening. It should include liaison with the network of primary care providers and provision of health education to newly arrived refugees.
- 8.18 Further, understanding of the specific needs of refugees is not consistent among the GP network and allied health services, resulting in inconsistency in the service this group receives. To improve the refugee health outcomes, there is urgent need for training, awareness raising and targeted information sessions for mainstream health providers.
- 8.19 Settlement service providers advised that structured and strong collaboration with refugee health experts can provide reassurance to caseworkers who are not medically trained that someone with medical expertise and deep understanding of the needs of their client group has some oversight of their care and can provide guidance and support along the way. It is also reassuring to the refugees who may feel overwhelmed without such support and on many occasions have delayed seeking medical attention due to lack of information and familiarity with the health system. It is unrealistic to expect that this gap can be addressed by settlement caseworkers or even by the current funding and structure of some of the more established refugee health services.
- 8.20 Health expert networks such as RHeaNa support this idea through their recommendation of the embedding of refugee health nurses in the settlement service across the country. The refugee health nurses can improve the communication between settlement and health services and can triage, make referrals and provide information about healthcare system in Australia. They can also enhance the health literacy of refugees.

Ways forward

- 8.21 In addition to some of the recommendations above, there are other practical ways to improve the health outcomes of refugees. Enhancing the meaningful collaboration between settlement and health sectors through a national framework is one example. We support recommendations made by networks like RHeaNA to develop such framework which focuses on collaboration and knowledge sharing of these sectors both at service provision and at policy levels. Through such collaboration the expertise of health services can be utilised in the design of the programs to make them more flexible and responsive to the needs of various groups of refugees, including children and elderly.
- 8.22 Refugee health outcomes can also be improved through enhancing health literacy amongst refugees. This is especially important for groups like pregnant women, new mothers, or older refugees. Targeted information about access to healthcare relevant to the areas refugees live in is also important. Specific consideration should be made to refugees living in regional areas where the health infrastructure might be different.

Recommendation 15 **Urgently address some of the most problematic refugee policies**

A number of current refugee policies have had some of the most detrimental impacts on the health (especially mental health) of refugees. The most prominent ones are family reunion policies and punitive policies that deny full support to a great number of refugees based on their visas. On the issue of family reunion, [our recommendations in our 2016 report on refugee family separation](#) still stand. We also call for granting access to the full suite of settlement support services to all refugees, irrespective of their mode of arrival in Australia and the subclass of their refugee visas.

Recommendation 16 **Establishing targeted programs for older refugees across the country**

Targeted programs that involve older people in social and group settings should be established across the country to reduce the social isolation of this group. Refugees and service providers who are already delivering such programs in a small and local scale should be consulted in the design of these programs.

Recommendation 17 **Embedding refugee health nurses in the settlement services across the country**

Appropriate funding should be allocated in the new contracts to embed refugee health nurses in the settlement services across the country. The refugee health nurses can improve the communication between settlement and health services and can triage, make referrals and provide information about healthcare system in Australia.

Recommendation 18 **Establishing a National Refugee Health Framework**

We endorse the recommendation of health experts that a National Refugee Health Framework is urgently needed. Such a framework can enhance the collaboration between health and settlement services at both service provision and policy levels.

9 Settlement support provided to people who evacuated from Afghanistan

- 9.1 This section is not a comprehensive analysis of how Australia's settlement support responded to the need of refugees who have recently been evacuated from Afghanistan. Such analysis requires much wider and longer consultations with refugees, service providers, and community members across the country. This section aims to provide some preliminary feedback that it received during the course of our recent consultations and hopes to provide a comprehensive analysis at a later stage when there is more appropriate opportunity for reflection by all stakeholders involved.
- 9.2 Refugees who were evacuated from Afghanistan shortly after the fall of the country's Government in August 2021, arrived in Australia with complex needs and little preparation. They arrived in Australia after going through a traumatic transit journey and without the chance to go through pre-arrival induction and health screening. Many got separated from their immediate family members and had no knowledge of their whereabouts. They arrived with missing documents and high levels of trauma. While some refugees may also experience these issues, it was unusual for the settlement service providers to receive such a high number of clients in a short timeframe who all shared this experience and therefore needed more complex support.
- 9.3 This happened at the time that settlement services had significantly shrunk due to lack of demand for services in the extended period of border closures and very limited refugee arrival. The diaspora community was also experiencing high level of trauma as they watched the events unfold in Afghanistan affecting their friends and family. The reality is despite all these

challenges, service providers, volunteers and community organisations worked around the clock to provide support. As one community members described:

Everyone was overwhelmed with the number of evacuees. So it was it was a very unprecedented situation, not just for one organisation, for us in the community, for the whole government. But we, these small community organisations, took some of this load. We put a step forward and helped the newly arrived refugees with clothes, with food, we did a lot of food delivery to the hotels, and we collected clothes from families, and we delivered them to the hotels. I think it reduced the level of stress or mental health problem within these new cohorts, just by engaging with them, just reaching out to them and say, 'hey, we are here, we are your community'. We were also trying to help people with applications for their family members back in Afghanistan and we had absolutely no funding. We did that just because they came from Afghanistan. And we felt for them, and we were impacted by the situation in the country as well because we all have family there.

- Member of a community organisation, Sydney

- 9.4 However, the 'perfect storm' created by the large-scale arrival of a group with complex needs at the time of staff shortage for many service providers, provided lessons for the future.
- 9.5 Many consultation participants commented that these experiences showed the impact of current policies that solely link funding of the providers to the number of arrivals. Therefore, providers lose funding and in many cases their experienced staff when there is an extended period of no arrival. These policies leave little room for contingency planning and the ability to respond to varying needs. Services are unable to retain their experienced staff and struggle to compete in a tight labour market to attract quality staff who can help the service scale up.

What we're trying to argue to the government is that you know, if you're going to reduce people's funding in line with a number of arrivals, then what's gonna happen when suddenly arrivals pick up again. And you've lost your workforce as well.

- Settlement service provider

- 9.6 The need for experienced staff was highlighted as particularly important as this group arrived with complex needs, high level of trauma, health issues, and various complex eligibility-related issues that required problem solving. For example, many of the people arrived on subclass 449 visas and were not eligible for NDIS or other state services like rental bond loans while they were on those visas. That meant service providers had to dedicate many hours to liaise with specialised health services and government departments. They also had to get extra documents and work to get exemptions and special considerations for access to services on a case by case basis. Additionally, the opportunity for group information and induction sessions was minimal in some states due to COVID-19 restrictions so the providers needed to deliver such information virtually and individually.
- 9.7 It has been widely acknowledged that some of the issues experienced by this group of refugees and by service provider were the result of a unique situation when a large-scale displacement happened during a global pandemic. However, it has also exposed some serious flaws and rigidity in the design of the settlement services that make quick responses to varying needs highly challenging.
- 9.8 Consultation participants highlighted the importance of being more prepared next time we need to respond to such need. They talked about the stresses of having to 'think on our feet' and struggles to secure short-term and long-term accommodation and address other needs.

They recommended that HSP could have a separate emergency response component that can be 'activated' next time there is a similar situation. The design of this component can take into consideration the current experiences and the need for more complex casework support and therefore lower client to staff ratio in such circumstances. There should be more funding available under this component for securing immediate support, like on-arrival accommodation. It can also formalise and provide a structure for the next steps that should be taken in supporting a group that is evacuated so has a unique set of circumstances like high level of trauma, little to no induction and preparation to live in a new country, missing documents and no pre-arrival health checks.

- 9.9 Future contracts should also have provisions that can make retention of staff in period of lower arrival more possible, for example by linking the funding not just to the number of arrivals but to their immediate and longer-term needs. This gives the providers more flexibility to better respond to emergency situations. This is discussed above in Section 4.

Recommendation 19 Review Afghanistan evacuation response

The Department of Home Affairs should conduct a review of its response to the Afghanistan evacuation, to gain insight for future emergency responses.

10 Enhancing broader community involvement

- 10.1 RCOA and NRAAG been advocating for a truly community-led settlement program, and it is very positive to see the implementation of the Community Refugee Integration and Settlement Pilot (CRISP). We welcome this new program and look forward to seeing it become a mainstay in the suit of settlement pathways in Australia. We also look forward to the program expanding in size and becoming addition to the humanitarian quota. As we have been highlighting for more than a decade, community sponsorship needs to be additional to the Australian Government's existing commitment, in order to compliment, not reduce, the existing humanitarian quota. We recommend that the Department with Community Refugee Sponsorship Australia (CRSA) to continue to review and evaluate the pilot, with an intention of making the program additional to the existing quota in the 2023-24 financial year.
- 10.2 Regarding the CSP, while it is positive to see some fees reduced, the program still has a number of design flaws, including the exclusionary criteria focused on employment rather than protection needs, high fees required by Approved Proposing Organisations (APOs), and the requirement to pay for HSP services, rather than utilising community-led settlement support as seen in the CRISP. These issues are systemic, and we believe it is easier to abandon the CSP, rather than reform it. Places set aside in the CSP should be allocated to the CRISP, with these visa categories set aside for named placed (which would either be family-linked applications or broader named applications for vulnerable refugee groups such as LGBTI or specific minority groups).
- 10.3 Community sponsorship, and CRSA's Group Mentorship Program, has provided broader insight into the support that the broader Australian community is keen to provide to newly arrived refugees. This was also seen in the community response to Afghan evacuees, and to Ukrainian communities. There is an enormous amount of goodwill and support from the Australian community, and settlement services and other organisations need to be encouraged and supported to harness this goodwill. Unfortunately, the rigid funding structures of existing settlement services do not allow organisations to utilise this funding for broader community development programs. While there are generous offers of donations, volunteers, employment and accommodation from the Australian community, it takes time and resources to adequately coordinate these offers.

10.4 In addition, there is the need to vet, train and support community volunteers to ensure vital safeguarding principles. Lessons from the recent UK 'Homes for Ukraine' response to Ukrainian refugees highlights concerns with un-monitored offers of accommodation and support.²⁰ CRSA's Group Mentorship Program strikes the right balance in terms of group independence and autonomy, as well as training and vetting. However, this requires funding to provide such oversight of community groups. Settlement services should be encouraged and funded to develop similar programs embedded within settlement programs in order to harness community goodwill.

Recommendation 20 Expand the Community Refugee Integration and Settlement Pilot

CRISP should be expanded on a long term basis, commensurate with community interest and involvement, and following ongoing monitoring and evaluations. The Department of Home Affairs should work with Community Refugee Sponsorship Australia to develop plans to extend the program to be additional to the humanitarian quota.

Recommendation 21 End the Community Support Program

The CSP should be closed down, with existing visa allocations merged into the CRISP and set aside as named applications.

Recommendation 22 Fund community development programs across all settlement services

All settlement services should be funded to facilitate community development programs to harness the goodwill of the community in terms of donations, volunteering, employment and accommodation.

²⁰ Jessica Elgot and Rajeev Syal (2022), *The Guardian*, 'UK refugee scheme could lead to exploitation of Ukrainians, say experts' <https://www.theguardian.com/world/2022/mar/15/uk-refugee-scheme-could-lead-to-exploitation-of-ukrainians-say-experts>