

Submission to the Welfare System Taskforce on the Interim Report of the Reference Group on Welfare Reform

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About FECCA

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australians from culturally and linguistically diverse backgrounds in Australia. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to government and the broader community.

FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism, to build a productive and culturally rich Australian society.

FECCA's policies are designed around the concepts of empowerment and inclusion, and are formulated with the common good of all Australians in mind.



Introduction

FECCA welcomes the opportunity to make a submission on the Interim Report of the Reference Group on Welfare Reform.

FECCA appreciates the Interim Report's focus on reducing complexity in Australia's welfare system, however, strongly advocates for reform measures to only be adopted in the event that they will facilitate greater benefits for all Australians in the present and longer term. In particular, FECCA advocates for welfare reform to focus on removing complexity for consumers with regard to understanding which support structures are available, how they will benefit individuals, and how they can be accessed. FECCA cites lack of awareness and understanding around such issues as a particular concern at present, particularly for Australians from culturally and linguistically diverse backgrounds.

Regarding the Interim Report more broadly, FECCA notes the absence of discussion regarding specific reforms that will impact Australians from culturally and linguistically diverse backgrounds. FECCA is particularly concerned that migrants and Australians from non-English speaking backgrounds are not explicitly identified in the Interim Report as potential 'at risk' groups. FECCA views this as problematic, given the Interim Report's overall focus on facilitating individuals' transition to the workforce as a priority. In this context, FECCA is concerned that challenges facing job-seekers from culturally and linguistically diverse backgrounds in their attempts to secure employment, including limited language skills, limited recognition of qualifications and prior working experience, as well as experiences of discrimination, did not feature prominently in the Interim Report's discussion. FECCA highlights the importance of such issues being identified and responded to with regard to developing a meaningful and practical strategy that will effectively facilitate entry of culturally and linguistically diverse job-seekers into the Australian workforce.

FECCA's submission broadly advocates the need for adoption of a client-centred approach to inform the architecture of the revised payment system. It is argued that such a model would be most effective in tailoring the system to meet the diverse needs of all Australians, and subsequently facilitate benefits for Australian society as a whole.

This argument is framed as part of a broader discussion that highlights the need for income support to facilitate social inclusion to be truly beneficial in the long term. In this context, it is asserted that despite continuous economic growth in Australia, disadvantage and exclusion remain, and continue to impact on vulnerable groups in society, including Australians from culturally and linguistically diverse backgrounds. The importance of positively reforming the income support system to respond to this is subsequently welcomed.

The submission that follows is FECCA's response to the key questions put forward for consideration through the Interim Report and provides a broad overview of the themes and issues of concern to FECCA's constituency.

FECCA acknowledges, and is grateful for, the contributions from its members, who provided substantive input into the issues and themes covered in this submission.



Pillar One: Simpler and sustainable income support system

Simpler architecture

FECCA advocates the need for adoption of a client-centred approach to inform the architecture of the payment system, to ensure that it is sufficiently tailored to meet the diverse needs of all Australians, including those from culturally and linguistically diverse backgrounds. Regarding this, FECCA acknowledges and welcomes the Reference Group's proposal to tailor requirements, services and other supports to respond to individual recipient's circumstances, including their current or future capacity to work, and supports the need for the individualisation of service delivery in this context.

Regarding further considerations to inform the new architecture of the payment system however, FECCA argues that simplification of the system is positive only to the extent that it facilitates greater accessibility for clients, including those from culturally and linguistically diverse backgrounds. It is noted in this context that the reforms proposed in the Report do not appear to approach the simplification of the system in a comprehensive manner. Rather, a theoretical shift in the focus of welfare towards prioritising the transition to employment is advocated, without adequately expanding on the substantive support mechanisms required to facilitate this.

On this issue, FECCA asserts that the system's proposed re-structuring may likely result in individuals confronting greater complexity in their attempts to gain access to vital supports as a result of the proposed changes, which appear to advocate a shift away from mutual responsibility (that is, the relationship between individuals and Government and the shared responsibility of both parties in the context of welfare support), towards a focus predominantly on individual responsibility, and an onus being placed upon individuals to secure employment as a priority.

FECCA emphasises the need to reflect on the theoretical underpinnings of Australia's income support system, and to factor these fundamental considerations into the debate on welfare reform. This involves highlighting the foundational underpinnings of the welfare model, identified by FECCA with regard to the following:

- Income support should make provisions to guarantee individuals and their families basic income and entitlements that will support them, irrespective of the market value of their work or property; and
- Income support should be premised on the need to reduce insecurity by providing
 individuals and their families with basic contingencies to militate against individual
 or family crises, particularly for those who may be otherwise disadvantaged—for
 example, as a result of their cultural or linguistic background, health status, age,
 gender, and so on).

FECCA emphasises the need for the above considerations to fundamentally underpin any approach to welfare reform that is adopted, based on the view that welfare should be considered with regard to the collective provision of public goods and services.



Regarding the Interim Report's recommendation on the need to "better differentiate between permanent and temporary incapacity" 1, FECCA emphasises that measuring eligibility should not be overly resource-consuming. Time and resources currently spent on evaluating individuals' eligibility for payments should not be exceeded through the introduction of measures that would alternatively require ongoing eligibility assessments.

Fair rate structure

Consistent with the Report's recommendation, FECCA supports the need to target higher rates of payment to capture people from culturally and linguistically diverse backgrounds who may be confronted with significant labour force disadvantages.

FECCA also supports the view that individuals should not be moved from higher to lower payments when their financial needs are the same, and believes that the system should be reformed to prevent this from occurring.

Support for families with children and young people

FECCA believes that providing adequate support for children and young people from culturally and linguistically diverse backgrounds is imperative to facilitate their settlement and ensure their positive engagement with society.

FECCA highlights that young people from culturally and linguistically diverse backgrounds, may, in some instance, require access to income support in their own right, in situations where their families may be unable to provide the requisite support to facilitate their settlement needs. In addition, many migrant youth face additional barriers in accessing and making use of services and may require targeted assistance as a result of this.

FECCA asserts that, in such cases, and in accordance with the need to tailor the system to benefit individuals and their particular circumstances, income support for young people in their own right may be required.

Effective rent assistance

FECCA's members have highlighted that the provision of rental assistance through the Commonwealth Rental Assistance scheme may, in some cases, exacerbate settlement-related issues faced by some culturally and linguistically diverse communities. It has been asserted, for instance, that the eligibility criteria for this assistance entrenches the status quo, and does nothing to encourage investors to provide high density, low cost accommodation that would be closer to employment opportunities to benefit disadvantaged

¹ Reference Group on Welfare Reform to the Minister for Social Services. 2014. *A New System for Better Employment and Social Outcomes*, p. 47, available at: http://www.dss.gov.au/sites/default/files/documents/06 2014/dss001 14 full report 27 june tagged.pdf



Australians seeking accommodation. Moreover, it is posited that the assistance provided does not allow for recipients to accumulate discretionary income to be used as a deposit on a home. It is also highlighted that, as discussed in the Interim Report, property rents are increasing at a higher rate than income, which, in itself, adds additional pressure to household budgets when the assistance remains income-based.

FECCA highlighted that, even for culturally and linguistically diverse Australians who are employed, changes within the labour market itself have resulted in a lack of long term employment stability and security, and a subsequent inability to alleviate housing stresses. For example, many individuals are employed on a casual or part-time basis, with no certainty of continuous employment or income. This situation not only prevents the accumulation of a deposit to become a home owner, but also impacts on the decisions of rental property, letting agents and landlords when they consider culturally and linguistically diverse applicants as prospective tenants.

FECCA also notes experiences of discrimination and exploitation reported by some tenants from culturally and linguistically diverse backgrounds². It is posited that this issue is further compounded by competition in the rental market, and the challenges faced by more disadvantaged Australians who are forced to seek out accommodation in competition with financially-stable occupiers, who choose not to become home owners, and who are more likely to take more desirable, well located rental properties closer to facilities and services³.

The result in such circumstances is often a significant amount of stress placed on culturally and linguistically diverse households as a result of experiencing higher transportation costs, limited choice in accessing education, health and social services, and the possible creation of low socio-economic communities on the margins of metropolitan areas.

In the context of the above issues, FECCA emphasises the need for the effectiveness of rental assistance to be assessed not in isolation, but in respect to the above contextual issues.

Rewards for work and targeting assistance to need

Employment plays a foundational role in the successful settlement of immigrants, and people from new and emerging communities, in particular, and contributes to fostering social cohesion, independence, individual self-esteem and wellbeing.

However, in addition to the challenges already presented by a competitive Australian job market, people from culturally and linguistically diverse backgrounds and new and emerging community groups in particular, often face additional barriers in their efforts to secure employment. These relate to their varying levels of language proficiency and literacy, educational attainment, pre-migration trauma, lack of local experience, lack of referees and often limited knowledge of the Australian workforce systems and cultures. In addition, they

² FECCA. 2013. *Multicultural Access and Equity: Strengthening Connections Between Communities and Services.* Available at: http://www.fecca.org.au/images/stories/documents/Submissions/2013/fecca_multicultural_access_equity_report_june2013.pdf



often face the challenge of having no established networks to use in seeking out employment, and the potential to face discrimination, both through recruitment and on-the-job, on the basis of their cultural, religious or linguistic background⁴.

These barriers are often exacerbated by structural gaps in employment service provision, lack of, or delays associated with recognition of overseas qualifications, limited mentoring programs and adequate career pathways, as well as limited availability of government funding targeted at specifically improving employment outcomes.

In this context, FECCA highlights that reframing income support to place the transition to employment at the heart of most individuals' interactions with the welfare system, may inadvertently create further disadvantage for some individuals, including those from culturally and linguistically diverse backgrounds, who often already experience significant challenges in accessing the system and securing employment.

FECCA subsequently emphasises the need for 'red tape reduction' measures to avoid simplification of the welfare system to the extent that it fails to recognise or respond to individual needs and circumstances that will impact upon the likely benefits derived from the available services and/or payments. FECCA notes that the present structure of the welfare system, albeit complex, does earmark specific support payments relevant to an individual's particular area of need, and designates appropriate welfare options on this basis.

Broadly concerning employment incentives however, FECCA advocates that people who encounter barriers in securing employment, such as those from culturally and linguistically diverse backgrounds, should receive maximum payment levels based on their current financial need, rather than their future employment prospects.

⁴ FECCA. 2014. Better Beginnings. Better Futures. Factsheet 3: Youth Employment in New and Emerging Communities. Available at:

http://www.fecca.org.au/images/NEC_factsheets/factsheet3_youth%20employment%20in%20new%20and%20emerging%20communities.pdf



Pillar Two: Strengthening individual and family capability

Regarding strengthening individual and family capabilities in the context of welfare reform, FECCA reiterates that employment and economic self-sufficiency are important components of effective settlement for many migrant and refugee communities. Meaningful employment is linked to a positive self-identity, financial independence and aids the process of establishing a sense of home in a new country⁵.

As such, consistent with the Interim Report's observation, FECCA concurs that the development of individual and family capabilities is critical to maximise employment and social participation and for people to lead full and productive lives ⁶. FECCA highlights, however, that the ability to individuals and families from culturally and linguistically diverse backgrounds to strengthen their own capabilities to maximise the opportunities available to them is often limited by circumstances beyond their control. It is subsequently highlighted that consideration of individual's capacity and needs is critical, and that, as the Interim Report notes, "the expectations of the system may be unrealistic for some people". An individualised approach is therefore vital in tailoring the system to strengthen individual and family capability.

Mutual obligation

FECCA reiterates its position that the system's proposed re-structuring may likely result in individuals confronting greater complexity in their attempts to gain access to vital supports as a result of the proposed changes, which appear to advocate a shift away from mutual responsibility (that is, the relationship between individuals and Government and the shared responsibility of both parties in the context of welfare support), towards a focus predominantly on individual responsibility, and an onus being placed upon individuals to secure employment as a priority.

Regarding personal and family responsibilities, FECCA highlights the need to avoid a punitive approach in administering adherence to income support provisions through an income management model. FECCA highlights, for instance, that while "promoting parental responsibility for ensuring children attend school" is presented as a strategy through which to ensure that young people benefit from education, parents and family members of culturally and linguistically diverse backgrounds may lack awareness of specific expectations in this regard. They may subsequently require support to understand the benefits for their children with regard to formal educational requirements in Australia, and their own responsibilities associated with encouraging their children's regular attendance at school. Encouraging greater awareness and understanding around such matters is advocated as the most effective approach through which to build individual and family capabilities.

⁵ Ethnic Communities Council of Victoria *Real Jobs: Employment for Migrants and Refugees in Australia.* ECCV Policy Discussion Paper No 3. 2008.

⁶ Reference Group on Welfare Reform to the Minister for Social Services. 2014. *A New System for Better Employment and Social Outcomes*, p. 79. Available at: http://www.dss.gov.au/sites/default/files/documents/06_2014/dss001_14_full_report_27_june_tagged.pdf



In addition, FECCA notes the Interim Report's consideration of income management as a budgeting tool to "build the capacity of individuals and families by helping people to stabilise their circumstances and better manage their income support payments to ensure essential needs are met". FECCA highlights however, that the ethic underpinning income management directly contrasts with the emphasis placed on individual empowerment that is espoused, for example, through the National Disability Insurance Scheme model. FECCA highlights the greater utility of the latter model to the extent that it supports individuals in tailoring services to facilitate their specific needs. In addition, FECCA highlights the reduction of red tape and administrative burdens through a self-managed model.

FECCA promotes the view that income support should be paid to entitled individuals without restriction on its use, unless the recipient elects to receive payments in a different form. Underpinning this position is FECCA's belief that individuals should be assisted to make informed choices regarding the services and supports that they require and be empowered through this process.

Education and Training

Through its community consultations, FECCA is aware that young people from culturally and linguistically diverse, and specifically, new and emerging community backgrounds, face specific challenges in relation to securing employment. Such barriers include limited language proficiency, lack of experience working in Australia, as well as discrimination and prejudice experiences via the recruitment process, and/or on the job⁷. Other issues have been identified as:

- lack of Australian qualifications, or limited recognition of overseas qualifications;
- lack of networks to use in seeking out and securing a job;
- limited familiarity with the Australian workforce, employment systems and culture;
- lack of confidence and/or fear of non-acceptance;
- lack of tailored employment services;
- pressure from families to prioritise obtaining a tertiary qualification over finding shortterm employment; and
- pre-migration experiences, including experiences of torture and trauma.

FECCA advocates the need for improvements to English language programs, to ensure that they are adequately designed to cater for a specific individual needs. This includes a focus on more tailored service delivery, to meet the specific needs of an individual, for example, through the provision of additional, or fewer, hours of English classes depending on the client's proficiency.

⁷ FECCA. 2014. Better Beginnings. Better Futures. Factsheet 3: Youth Employment in New and Emerging Communities. Available at:

http://www.fecca.org.au/images/NEC_factsheets/factsheet3_youth%20employment%20in%20new%20and%20emerging%20communities.pdf



Regarding the quality of job-relevant training opportunities, FECCA also advocates the need for training programs to include a practical experience component, in order to equip young people, and those from culturally and linguistically diverse backgrounds, in particular, with the skills and knowledge required on the job. In addition, FECCA also highlights the need to extend apprenticeship opportunities beyond the traditional manufacturing industries in order to meet both Australia's workforce shortages, as well as the employment preferences of young people with regard to their interests and skills.

Finally, developing more flexible mechanisms that allow client differences and needs to be identified on a case-by-case basis is suggested as an effective way through which to improve the design and delivery of employment services for young people from new and emerging community backgrounds.

Improving individual and family functioning

Through the community feedback that it has received, FECCA highlights that the processes used to deliver services are often extremely complex and confusing, especially for clients who require assistance to address a number of diverse issues. Feedback has indicated, for example, that clients often report feelings of being 'handballed' through the system, leaving them confused, and forcing them to discontinue their attempts to access services, as opposed to benefitting from them to improve their situation. It has even been anecdotally reported that some culturally and linguistically diverse families have become more isolated or separated as a result of poor service delivery models, and that their circumstances have been further exacerbated as a result of such negative interactions regarding service provision. FECCA subsequently advocates the need for service delivery to be efficient, culturally appropriate, client-centred and responsive to the needs of individuals and their families that seek access to them.

Evaluating outcomes

FECCA promotes the importance of continued evaluation of the access and equity of government services and support structures, particularly with respect to the experiences of culturally and linguistically diverse Australians.

To better evaluate the effectiveness of income support and its impact on individuals and families, FECCA advocates the need for increased direct engagement between Government agencies responsible for the delivery or administration or services and/or support structures, and the individuals and communities that they are delivered to. In this context, FECCA notes that while community organisations should assist agencies in facilitating the delivery of feedback from clients, Government should assume direct responsibility to canvass individual and community perspectives on the effectiveness and outcomes of the programs and services that it offers.

⁸ FECCA 2013-14 Access and Equity consultation participant feedback.



Pillar Three: Engaging with employers

As has been previously stated, sustainable employment for people of culturally and linguistically diverse backgrounds is linked to positive self-identity, financial independence and assists the process of social inclusion. Conversely, un- or under- employment can result in poor social, financial and emotional outcomes for individuals and negatively impact on families and the communities in which they live.

FECCA welcomes the Interim Report's focus on engagement with employers as a primary enabler of workforce participation, and highlights this specifically with regard to job-seekers from culturally and linguistically diverse backgrounds. FECCA concurs with the Interim Report's recommendation that "employers should be encouraged to make jobs available for disadvantaged groups" and advocates the need for a more explicit focus on facilitating engagement between prospective employers and job-seekers from culturally and linguistically diverse backgrounds.

Employment focus - making jobs available

Whilst commending the Interim Report's focus on facilitating stronger engagement between employers and job-seekers, FECCA is concerned by the absence of discussion regarding job-seekers from culturally and linguistically diverse backgrounds, and the particular challenges that such individuals face in their efforts to secure employment. This is particularly problematic in view of recent Australian Bureau of Statistics data ¹⁰, which highlights that the recently-arrived migrant population has a higher rate of unemployment (8.5 per cent) than the Australian born population (4.6 per cent), and approximately 35 per cent of recent migrants who arrived in Australia after the year 2000 experience some difficulty finding their first job in Australia. The most common challenges experienced include a lack of Australian work experience of references (64 per cent), language difficulties (33 per cent), lack of local contacts or networks (23 per cent), no jobs in their locality, line of work, or at all (15 per cent), and difficulties with their skills or qualifications not being recognised (15 per cent).

In light of the above and other substantive evidence that highlights the challenges impacting upon culturally and linguistically diverse job-seekers, FECCA strongly advocates the need for considerations regarding such communities to be factored into any prospective revisions to the income-support system. Specifically, FECCA asserts that engagement with employers is vital in facilitating the transition of people from culturally and linguistically diverse backgrounds into the Australian workforce, and there is a need for far greater attention to be focussed on the strategies that can best facilitate such engagement.

⁹ Reference Group on Welfare Reform to the Minister for Social Services. 2014. A New System for Better Employment and Social Outcomes, p. 95. Available at:

http://www.dss.gov.au/sites/default/files/documents/06_2014/dss001_14_full_report_27_june_tagged.pdf

¹⁰ Australian Bureau of Statistics. 2011. *Perspectives on Migrants*. Available at: http://www.abs.gov.au/AUSSTATS/abs@.nsf/allprimarymainfeatures/829390753C5B2909CA257A850013E480?opendocument



Related to this point, FECCA notes the report's observation that "progressive businesses recognise the importance of meeting social responsibilities through a diversified workforce" FECCA highlights, however, that business should not simply be encouraged to conform with what they may see as 'obligations', but should alternatively be encouraged to embrace the benefits, and maximise the value, of a culturally and linguistically diverse workforce, and see this as a force through which to facilitate a more innovative, creative and productive workforce.

To facilitate this, FECCA advocates the need for Government to better support initiatives aimed at assisting both migrant job-seekers in boosting their job-readiness capabilities, as well as supporting Australian employers, through encouraging them to maximise the value of a culturally diverse workforce.

Specifically, FECCA recommends the need for Government to further promote the benefits of a culturally diverse workforce engaging in a national information campaign to raise awareness regarding the benefits of employing staff from culturally and linguistically diverse backgrounds. FECCA also highlights the need to encourage employers to develop and implement workplace anti-discrimination policies and multicultural action plans.

Further strategies towards encouraging employers to make jobs available to culturally and linguistically diverse job seekers are outlined in FECCA's *Harmony in the Workplace* resources, available on FECCA's website, at: http://www.fecca.org.au/images/Documents/Harmony/full harmony%20in%20the%20workplace delivering%20the%20diversity%20dividend.pdf

Improving pathways to employment

FECCA welcomes the Interim Report's focus on further exploring ways through which to facilitate transition pathways for disadvantaged job seekers, including young people, however, reiterates the need for specific focus to be placed upon facilitating increased employment opportunities for culturally and linguistically diverse Australians as a particular 'at risk' group.

FECCA recommends the need for improvements to English language programs, to ensure that they are adequately targeted and cater to individual needs and Australian workforce expectations. In addition, FECCA suggests that training programs should include a practical experience component, to equip disadvantaged job-seekers, and particularly those from culturally and linguistically diverse backgrounds, with the requisite skills to effectively participate in the workforce.

Through its engagement with young people from new and emerging communities, FECCA has also specifically identified the need for an established and targeted mentoring program. Due to the varied intersectional barriers they face, young people from refugee and humanitarian backgrounds require additional support to identify and pursue education and

¹¹ Ibid.



employment opportunities and to navigate the Australian employment system. Mentoring is an effective way through which to provide young job seekers with practical knowledge of workplace practices, expectations, culture and systems, and enable them to overcome some of the barriers that they face in gaining and retaining employment. Mentoring programs also help job seekers to develop professional networks, boost their confidence in their skills, and improve their prospects in terms of finding jobs to match their qualifications.

Supporting employers

FECCA notes that Australia's workforce has been progressively shaped and enhanced by the contributions of immigrants and people from culturally and linguistically diverse backgrounds, so much so that population policy has increasingly constituted a key consideration of economic and employment policy in Australia.

In the context of global financial challenges, increasing labour demands and market competitiveness, FECCA subsequently advocates that Australia's greatest opportunities lie in its ability to harness the wealth of skills and resources on offer, including through our culturally diverse workforce, to deliver benefits for both employers and their staff. FECCA highlights that, broadly, the unique skills, knowledge and expertise that culturally and linguistically diverse workers bring is not yet sufficiently acknowledged, promoted, or utilised in Australian workplaces. This is evidenced by the employment barriers that continue to face people of culturally and linguistically diverse backgrounds related to finding employment, having limited recognition of overseas skills and qualifications, and being exposed to instances of discrimination, racism and intolerance. Effective diversity management to address these barriers is important to fully utilising and maximising the benefits of our diverse workforce.

In addition, FECCA advocates the need for more effective job-matching to ensure that the skills of job-seekers from culturally and linguistically diverse backgrounds matches with employment opportunities, and that the former are subsequently able to make a contribution, particularly in areas that may be growth sectors for the Australian economy. This requires recognition of the prior skills and experience that migrant job-seekers may bring with them, and can subsequently be put to use.

FECCA also recommends the need to reduce red tape through streamlining and improving the consistency of information and messages regarding job services available and how these can be accessed. Feedback from FECCA's consultations with culturally and linguistically diverse communities and service providers reiterates that navigating through the job services system is often time consuming and overly complex, and it has subsequently been suggested that streamlining the provision of information would assist to mitigate this issue.



Pillar Four: Building community capacity

FECCA welcomes the Interim Report's focus on investigating strategies to build community capacity, in addition to the Report's assertion that "investments by government, business and civil society play an important role in strengthening communities" 12.

FECCA recommends the following strategies to better enable disadvantaged job seekers to participate in their communities to improve their employment outcomes:

- Support initiatives that bring employers and job seekers together, including through the provision of adequate public expenditure to support programs that can facilitate this.
- Facilitate direct connections between job service providers, employers, trainers and
 job-seekers to foster networking and information sharing with regard to the
 opportunities for employers in building a culturally diverse workforce, and to raise
 awareness around the barriers to employment that often confront job-seekers from
 culturally and linguistically diverse backgrounds.
- Encourage research and collaboration to spread best practice— both to, and between, employers, employment and training providers, non-profit communitybased social service providers and governments.

Fundamentally, FECCA advocates the importance of involving all individuals, groups, and stakeholders in society to demonstrate commitment towards building individual and community capacities—this is integral to avoid the emergency of stigma that may otherwise result from a system that is perceived to 'help only the needlest' and, in turn, create negative self-perceptions for many of those who do claim support, as well as those who are entitled to. Any proposed changes to Australia's welfare and income support structures must have 'buy-in' at all levels, and deliver broad-reaching and long-term benefits for society as a whole.

Role of government

FECCA advocates the need for government to support community-driven initiatives aimed at increasing the capacity of employers to appoint refugee and migrant workers and improve understanding of how to best support migrant and refugee job seekers and their employers.

In addition, FECCA commends the government's commitment to Harmony Day as a celebration through which to encourage all Australians to realise and embrace Australia's cultural diversity. The event is an opportunity, in particular, to engage workplaces in an active celebration of cultural diversity and the contributions made by employees from culturally and linguistically diverse backgrounds. FECCA advocates the need for the continued (and increased) promotion of Harmony Day, in order to positively shape public sentiment regarding the benefits of a diverse and inclusive Australian workforce.

Reference Group on Welfare Reform to the Minister for Social Services. 2014. A New System for Better Employment and Social Outcomes, p. 111. Available at: http://www.dss.gov.au/sites/default/files/documents/06 2014/dss001 14 full report 27 june tagged.pdf



Role of local business

FECCA highlights that for many migrants and refugees, securing finance to start a business is difficult due to limited funds, capital and credit history. In light of this, FECCA endorses community initiatives that generate opportunities for micro business to drive employment outcomes ¹³. The value of such initiatives is the extent to which they can make use of community finance and social investment to service and support people, non-profit organisations and social enterprises that are disadvantaged and underserved by mainstream financial institutions.

FECCA recommends the need for Government to work in partnership with multicultural community organisations to promote resources for social enterprise initiatives that are targeted at new migrant and refugee job seekers to drive employment outcomes.

Access to technology

FECCA notes that platforms used by government to facilitate service delivery are currently undergoing a significant transition on the basis of macro-issues, including developments in technology and the need for more efficient and responsive services to cater to a broader client base. This forms part of a broader series of trends, towards greater integration across agencies, shared services and infrastructure, and the government's overall intention to provide more efficient and less costly services ¹⁴. These factors have resulted in a movement toward electronic information and service provision, away from more traditional mechanisms.

FECCA observes, however, that adopting an electronic information provision strategy alone raises issues regarding the broader accessibility of services for culturally and linguistically diverse Australians. Many migrants and people from new and emerging community backgrounds, for example, have limited computer literacy skills, and therefore, cannot effectively access information or services provided electronically. In addition, many migrants often lack the financial capacity to afford purchasing the required equipment to access information electrically.

To work around these issues, FECCA recommends the need for consideration of the accessibility of electronically-provided information in the design and delivery of income support and services, and simultaneously highlights the need for information to be provided in formats that do not require access to technology, to ensure that they are broadly accessible.

¹³ Ethnic Communities' Council of Victoria. 2014. Work Solutions: Improving Cultural Diversity and Inclusion in the Workplace. Available at: http://eccv.org.au/library/FULL_REPORT_ECCV Work Solutions Discussion Paper Feb 2014.pdf

¹⁴ Commonwealth Department of Human Services. 2011. 'Service Delivery Reform: Transforming Government Service Delivery'. Available at:

http://www.humanservices.gov.au/spw/corporate/about-us/resources/service-delivery-reform-overview.pdf



Community Resilience

FECCA welcomes the Interim Report's focus on building community resilience with regard to welfare reform, in terms of it presenting a long term and sustainable approach to individual empowerment.

In facilitating community resilience however, FECCA advocates the need for greater recognition of the full spectrum of issues that impact upon individuals and their families, and are likely to result in their need to access income support. FECCA specifically highlights the need for recognition of challenges impacting on culturally and linguistically diverse Australians in this regard.

FECCA forwards the following recommendations as effective strategies through which to build community resilience:

- focus on enhancing community development and service delivery in line with evidence of what works for individuals, families and communities experiencing social exclusion;
- facilitate community networking activities to continue to build a sustainable and selfsufficient community sector;
- provide opportunities for, and build participation in, key events, workshops and social gatherings;
- promote and support the role of community groups;
- improve community participation and cohesion through the delivery of social or recreational services or activities by enhancing community infrastructure;
- improve opportunities for people from particularly disadvantaged or isolated community groups to be included in community activities; and
- provide support for partnerships to develop and implement innovative projects to assist un- and under-employed migrant and refugee job seekers to prepare for, and gain, sustainable employment, or progress in their careers.



Conclusion

FECCA recommends the need for reform measures to be adopted with regard to Australia's welfare system only in the event that they will facilitate greater benefits for all Australians in the present and longer term. In particular, FECCA advocates for welfare reform to focus on removing complexity for consumers with regard to understanding which support structures are available, how they will benefit individuals, and how they can be accessed.

FECCA also promotes the fundamental need for consideration of specific reforms that will impact Australians from culturally and linguistically diverse backgrounds, and for migrants and Australians from non-English speaking backgrounds to be identified as potential 'at risk' groups. This is considered vital in view of the Interim Report's overall focus on facilitating individuals' transition to the workforce as a priority.

Finally, FECCA advocates the need for adoption of a client-centred approach with regard to the development of a revised welfare structure. This is essential to ensure that the needs of all Australians are considered and understood, and that they system can effectively support individuals to improve their circumstances and live fulfilling lives.