



Australian Government
**Department of Immigration
and Border Protection**

Summary of Feedback

The Community Sponsorship Programme discussion paper

(July 2015)

Introduction

On 3 June 2015, Minister Dutton agreed for the Department of Immigration and Border Protection (the Department) to undertake public consultations on the potential implementation of a Community Sponsorship Programme (CSP) under Australia's Humanitarian Programme.

On 15 June 2015, the department published a discussion paper seeking comment on a number of important factors and issues associated with the design of a CSP, and some possible features of the programme. This summary outlines the key themes and suggestions submitted by stakeholders in response to the discussion paper.

Executive summary

- A total of 17 submissions were received.
- Stakeholder feedback to the discussion paper suggests that community organisations strongly support the implementation of a CSP as an alternative resettlement pathway for families and communities who are able to provide social and financial settlement support for new arrivals.
- Although the discussion paper did not specifically ask whether the CSP should sit outside the Humanitarian Programme, 13 respondents independently advocated for this to occur.
- Most respondents argued that certain proposed features of the CSP diluted the humanitarian nature of the existing programme, therefore giving grounds for CSP places to be additional to the standard Humanitarian Programme allocation.
- Many organisations commented on the social benefits of having refugee communities support newly-arrived humanitarian entrants, provided an adequate safety net was available.
- Stakeholders also indicated interest in seeing more involvement from smaller community organisations, an expansion of the APO network, and retention of the standard humanitarian eligibility criteria.
- Of the 15 organisations which commented about the introduction of an AoS, 14 were opposed to it, and one was in favour.
- Most organisations felt that any VAC fees should be set at a low level.

General comments on the introduction of a CSP

Is a Community Support Programme (CSP) supported?

Feedback suggests that, overall; there is support for a CSP however the following caveats were put forward:

- Visa places should be additional to those offered in the standard Humanitarian Programme.
- There is a perception that the CSP is a cost cutting scheme.
- To ensure equity of access, the CSP should be available in all states.
- Applications should be prioritised according to humanitarian need.

Should a CSP be inside or outside the Humanitarian Programme?

Although the discussion paper did not specifically ask whether the CSP should sit outside the Humanitarian Programme, 13 respondents independently advocated for this to occur. This suggests that there is strong support for creating the CSP as an additional stream to the Humanitarian Programme. The following reasons were given:

- If highly vulnerable and complex needs cases are not eligible, keeping a CSP part of the Humanitarian Programme undermines its humanitarian nature.
- Visa places under the Humanitarian Programme should remain available to people with an urgent need for protection, rather than those who have family or friends with financial resources.
- If the CSP remains in the Humanitarian Programme it will disadvantage those who cannot afford to access the scheme, especially considering CPP applications are assessed with priority.

General reflections on the Community Proposal Pilot (CPP)

Some general reflections included:

- An independent evaluation of the CPP should occur prior to a CSP being rolled out.
- Lack of awareness/publicity around the CPP has led to problems addressing client expectations generated by misinformation.
- The APO business model including proportional risk, legal liability and funding structures places unfair burden on APOs.

Who should be able to propose humanitarian clients, and what attributes are important?

There was unanimous support for both families and community organisations to be able to propose people under the CSP. The key proposer attributes that were suggested include:

- the strength and currency of the relationship between proposer and applicant
- financial capacity
- ability to secure accommodation in a competitive rental market
- settlement experience
- social capital
- strategies for finding employment
- long term commitment to respond to settlement challenges.

In regard to possible sponsoring community groups, s. 47G(1)(a) suggested:

- volunteer-based community organisations with a proven record in supporting refugee and humanitarian entrants to settle in Australia, such as s. 47G(1)(a) refugee support groups
- organisations established by former refugees which have connections and provide various forms of support to refugee communities in Australia and overseas, and
- humanitarian and faith-based community organisations which have a social justice outlook are involved in the delivery of social services and have a resource base which would make them well-suited to fulfilling the role of a sponsor group.

How can the existing APO model be tailored to better suit a CSP?

The APO model received significant support, with the following variations being suggested:

- Expand the number of APOs, to have one service provider per state/territory.
- Allow community organisations to lodge CSP applications independently, rather than through an APO.
- APOs should not assess applications; this role should lie with the department.
- APOs should have additional funding to ensure clients receive sufficient/high quality settlement support and monitor settlement outcomes.
- The department should undertake monitoring and quality assurance activities of APOs and the services they provide, given the significant fees they earn in administering the programme.
- The role of SCOs needs to be clarified, and greater involvement from these groups should be facilitated.

Who should be eligible for a humanitarian visa in a Community Support Programme?

Key themes commonly raised were:

- Maintain existing humanitarian criteria for eligibility (including being subject to persecution or substantial discrimination).
- 'In-country' applications should be accepted.
- A family connection should be required – utilising a broad definition of 'family'.

Should the CSP target applicants likely to settle more quickly than vulnerable applicants?

Overall, organisations were not supportive of using employability, health, age, English proficiency as factors for determining eligibility for a CSP. The key points raised include:

- The highly vulnerable should not be settled through CSP.
- The CSP should not target people on the basis of how quickly they might settle.
- Stricter health requirements should not be used as eligibility criteria due to the logistical difficulties associated with implementing in-depth medical screening.
- Eligibility should *only* be based on refugee status, family/community links, and the support the family/community can provide.
- Targeting applicants may lead to a perception that the CSP is discriminatory.

Priority processing

There was mixed support for priority processing. A small number of organisations felt that it offered the CPP a point of difference, which proposers are happy to pay for. However, the majority of organisations were opposed to it, general sentiments included:

- Priority processing will lead to community concerns around the integrity/transparency/equity of the Humanitarian Programme.

- CPP applications should receive the same processing priority as the SHP (humanitarian need being the primary criterion for prioritisation).
- Priority processing advantages those who can pay and disadvantages those who can't, as these visas are still being taken from the Humanitarian programme (as opposed to a separate allocation).

Could the CSP be used to settle people with no links in Australia to regional areas?

Generally there is support for regional settlement, however most organisations felt that more settlement support is required for unlinked people in regional areas compared to metro areas. As such, organisations felt that regional settlement could work where there are adequate support services available, and community support.

Should a Community Support Programme include an Assurance of Support (AOS) requirement?

Of the 15 organisations which commented, 14 were opposed to an AOS, and one was in favour. Organisations raised concerns that an AOS would:

- undermine the intent of the Humanitarian Programme
- place undue pressure on the sponsor/entrant relationship, which could lead to a breakdown, and
- compound existing financial hardship suffered by refugee communities.

The [s. 47G\(1\)\(a\)](#) suggested that the CSP VAC should be significantly lower than the CPP; if so, this would allow a 12 month AoS requirement to be applied. The AoS would cover settlement costs during the first 12 months of arrival in Australia, however not the costs associated with income support.

Approaches to assist securing employment

Family and community links were consistently regarded as the most effective way for refugees to gain work experience and employment.

The existing employment services were not well regarded. It was noted that they should be retained but need to be improved so that the provider demonstrates cultural awareness, and is sensitive to the needs of refugees, particularly torture and trauma survivors.

The need for a better system for qualification and skills recognition was also mentioned.

What is the role of communities in contributing to the Community Support Programme?

The comments under this section largely related to the VAC, and included:

- the VAC creates a significant amount of financial pressure on the proposer, the cost needs to be reduced
- having a VAC and AOS would make this programme unattainable for a lot of people
- people shouldn't have to pay for a humanitarian visa as it is against the ethos of the Humanitarian Programme.

Some suggestions included:

- The VAC to be the same cost as a skilled migration or partner visa (which is more affordable and doesn't compromise the values of the Government).
- The bulk of fees could be incurred at the time of visa grant.
- A concession for larger families.

What settlement support should be available for humanitarian entrants under a community support programme?

Organisations were very supporting of family and community organisations providing settlement services due to associated benefits such as the refugee having close contact with someone from their own cultural/linguistic background, and the proposer's social networks and previous personal experience settling in Australia.

If the programme did not have access to HSS, most organisations felt that a safety net would be required in case the proposer is unable to provide the adequate assistance. This would include access to torture and trauma services and Complex Case Support.

Continuing access to employment services and AMEP at no cost was highlighted by most organisations.

Some suggestions included:

- APOs to conduct training and/or information sessions for proposers before the entrant/s arrive.
- If HSS is not part of the programme, sponsors should have the option of paying for it where they are unable to provide the support themselves.
- Maintain full access to HSS.

Assistance achieving self-sufficiency

Some suggested strategies for assisting refugees to become self-sufficient quickly included:

- Regular meetings between the APO, proposer and refugee in the first six months after arrival. This will allow the APO to monitor progress towards key competencies and orientation requirements. These competencies and requirements could be adapted from those required under HSS.
- Settlement competencies and orientation could be delivered in a staged but comprehensive way after arrival (as currently occurs in HSS).
- APOs could develop and deliver a standard initial orientation programme over a short time period. The sessions would be attended by both the Proposer/SCO and the refugee. Interpreters would be engaged to ensure clear understanding.

Agency feedback

Community Support Programme (CSP) discussion paper

Contributing organisations

No.	Organisation	Contact	Date of submission
1	s. 47G(1)(a)	s. 47F(1)	26/7/2015
2			15/07/2015
3			10/07/2015
4			13/07/2015
5			13/07/2015
6			15/07/2015
7			15/07/2015
8			15/07/2015
9			15/07/2015
10			16/07/2015
11			20/07/2015
12			21/07/2015
13			20/07/2015
14			15/07/2015
15			15/07/2015
16			22/07/2015
17			16/07/2015

General comments on the introduction of a CSP

Is a CSP supported?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> s. 47G(1) would actively support the programme being extended if: <ul style="list-style-type: none"> places were additional to the annual humanitarian intake applicants were prioritised on the basis of humanitarian need, rather than being on a first-come-first-served basis, or on the speed at which they can muster the funds (understanding that it is a fee-for-visa program). s. 47G(1)(a) supports the underlying objective of the Community Support Programme, which seeks to increase Australia's capacity to resettle individuals in humanitarian situations overseas. Program should genuinely increase Australia's capacity to resettle those in humanitarian situations. It should not 'privatise' the humanitarian program, pushing costs onto community organisations which should be borne by government. s. 47G(1)(a) welcomes consideration by DIBP of additional humanitarian avenues that may expand existing protection capacity. Strongly supports the expansion of the Humanitarian Programme through the introduction of a CSP. Places available in a CSP should be increased.

Should a CSP be inside or outside the Humanitarian Programme?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> A Community Support Programme should be an additional stream to the Humanitarian Programme, without any reduction of places available in the latter. De-link CSP from the Humanitarian Programme – as highly vulnerable/complex needs cases are not eligible. Maintaining the link skews the focus of the Humanitarian Programme, which prioritises people for resettlement based on need. CSP carries a far lower cost for the government; as such the number of visas available under the program could be significantly expanded. An uncapped CSP could also be explored, depending on the costs involved. CSP visa places should be in addition to those offered under the Humanitarian Programme, rather than taken from within it, to ensure that places under the Humanitarian Program remain available based on need for protection rather than financial resources and are available to all communities.

s. 47G(1)(a)	<ul style="list-style-type: none"> The CSP, if it is implemented, must be an additional fixed number of places, outside of the core the Humanitarian Programme intake. If it is to remain within the Humanitarian intake then a specific quota should be specified and the humanitarian intake increased by that quota so that it does not diminish humanitarian places for those most vulnerable. CPP/CSP sit outside Hum programme – which is guided by recipient need and vulnerability (not fee-for-service).
	<ul style="list-style-type: none"> s. 47G(1)(a) recommends the proposed CSP be an additional component complementary to, rather than included within, the existing Humanitarian Programme.
	<ul style="list-style-type: none"> The CSP visa quota should be additional to the annual Humanitarian Program allocation not deducted from it.
	<ul style="list-style-type: none"> Places should be additional to standard Humanitarian Programme.
	<ul style="list-style-type: none"> s. 47G(1) strongly recommends CSP places be allocated outside the current Humanitarian Programme to allow maximum access for those who are not able to pay, but who remain in desperate need of protection and family reunion.
	<ul style="list-style-type: none"> CSP should increase the number of places under the Humanitarian Programme — additional to the overall quota.

General reflections on the Community Proposal Pilot (CPP)

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> s. 47G(1)(a) have not heard of the CPP. DIBP and APOs need to ensure bipartisan support for the continuation of the programme.
	<ul style="list-style-type: none"> There is a need for the Humanitarian Programme and APOs to stay focussed on the values of refugee protection. Independent evaluation of the CPP should occur prior to a CSP being rolled out. Refugee communities are subject to their own internal political pressures, CPP has been known to exacerbate this. In the long term CSP may have significant impacts on the nature, scope, location and size of refugee communities. APOs are bearing significant programme costs - addressing enquiries which do not lead to applications due to the small numbers of visas available under the programme. Lack of awareness/publicity about CPP leads to problems around addressing client expectations generated by misinformation. Legal constraints and risk factors create additional pressures for APOs, and limit the development of regional partnerships. The business model including proportional risk, legal liability and funding structures places unfair burden on APOs.
	<ul style="list-style-type: none"> The Department should actively encourage the development of APOs in each state and territory to ensure equity of access to a Community Support Programme.

s. 47G(1)(a)	<ul style="list-style-type: none"> • There is a perception that CPP is a cost cutting scheme. • DIBP should overhaul ref and hum family reunion options by developing a Humanitarian Family Reunion Program that is separate from the Refugee and Humanitarian Programme and the family stream of the Migration Program. • Conduct a public review of the CPP, in the interests of greater transparency around CPP processes and outcomes, and building confidence in a future CSP.
	<ul style="list-style-type: none"> • An external evaluation of settlement outcomes in the CPP be commissioned by the Department and made available to stakeholders prior to the implementation of the proposed CSP.
	<ul style="list-style-type: none"> • The current CPP provides an alternate resettlement pathway, rather than expanding overall resettlement capacity.
	<ul style="list-style-type: none"> • An independent, high quality evaluation of the CPP is required prior to expansion of the programme. • The CSP should be available in all states and territories.
	<ul style="list-style-type: none"> • Current CPP is within overall Humanitarian Programme so it disadvantages those who cannot afford to access the programme, especially considering CPP applications are assessed with priority.

Who should be able to propose humanitarian clients, and what attributes are important?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> • Suitable proposers are communities actively supporting refugee families financially and emotionally. • Proposer attributes include citizenship status, financial capacity, their own settlement outcomes, close sponsor relationship to ensure ongoing commitment to settlement and avoid exploitation. • Proposing organisations should include a well-established community base, experience/knowledge of refugee, humanitarian and settlement work, work closely with APOs to allow effective monitoring and accountability.
	<ul style="list-style-type: none"> • Communities should identify people to propose. • Key proposer attributes - relationship to the proposed entrant, their reputation and community standing, previous experience providing settlement support to humanitarian entrants, previous experience in finding humanitarian entrants paid employment in the labour market, and their capacity to support humanitarian entrants. • Overseas Posts could propose people.
	<ul style="list-style-type: none"> • Individuals, families and community groups should continue to be able to propose humanitarian entrants under a Community Support Programme.

s. 47G(1)(a)

- Volunteer-based community organisations with a proven record in supporting refugee and humanitarian entrants to settle in Australia, such as s. 47G(1)(a) refugee support groups
 - Organisations established by former refugees which have connections and provide various forms of support to refugee communities in Australia and overseas
 - Humanitarian and faith-based community organisations which have a social justice outlook, are involved in the delivery of social services and have a resource base which would make them well-suited to fulfilling the role of a sponsor group.
- Proposers should have an understanding of:
 - refugee issues (personal experience or through working with refugee communities)
 - settlement needs and issues for humanitarian entrants and knowledge of services available.
 - Proposers should be able to demonstrate their capacity to:
 - provide settlement support to humanitarian entrants
 - draw on appropriate foreign language/translator support where relevant.
 - Proposers should be of good character, and have a personal connection with the entrant/s.
- There is value in communities being able to propose and they can provide a lot of the services required, however they need to be financial. There is no guarantee that appropriate settlement supports will be provided by the proposer or APO.
 - UNHCR and DIBP should not be involved in identifying entrants under the programme.
- Communities in Australia should be able to propose people for a humanitarian visa under a CSP.
 - CSP proposer attributes:
 - the strength and currency of the relationship between proposer and applicant
 - financial capacity, ability to secure accommodation in a competitive rental market
 - experience
 - social capital
 - strategies for finding employment
 - long term commitment to respond to settlement challenges.
- Eligibility of sponsors be guided by family and/or community connections to refugees/others being proposed for sponsorship.
 - Proposers should be Australian citizens, permanent residents, or organizations or eligible New Zealand citizens.
 - Prospective proposers should be screened to ensure they can provide economic, material and social support required for meaningful settlement.
- Allowing communities to identify people to propose is optimal as these communities are well-placed to understand the circumstances and needs of the individual overseas. Identification of applicants should not just be linked to families as this disadvantages those who may be in great need, but do not have a direct family connection.
 - There is also a role for UNHCR and DIBP to identify people for proposal under a CSP.

s. 47G(1)(a)	<ul style="list-style-type: none"> • IMAs and UAAs should not be excluded from proposing under the CSP. • In the CPP individuals are able to bypass SCOs entirely and approach APOs directly. This undermined the CPP's community-based focus, as settlement outcomes ceased to focus on community involvement and support. Because of these reasons, as well as the extraordinarily fast processing times, the CPP was viewed by some community members as a priority processing fee (or even a fee effectively guaranteeing a visa), available only to well-established and well-resourced communities, rather than an inclusive community support model. • The risk of unsuccessful applications can be reduced by ensuring that the organisations sponsoring refugees are engaged with migration lawyers. • Sponsoring agencies need to have strong links, and work with those communities before any EOI process, in order to broaden participation in the program and target sponsorship to those who need it most.
	<ul style="list-style-type: none"> • Proposers will ideally need to ensure that they have a network of contacts, employment options, language courses, resettlement services, cultural orientation, adequate housing and access to social services. • Having Australian community members/organisations provide settlement support services enhances the sense of belonging, newcomers get a quick response, have established resources/knowledge regarding housing, schooling and general welfare services to cushion the often difficult resettlement process.

How can the existing APO model be tailored to better suit a CSP?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> • Supportive of the current APO model being used in the Community Support Programme. • DIBP to monitor and maintain current standards and service integrity. • Expand the APOs, to have one service provider per state/territory, with NSW/VIC having 2-3 APOs. • APOs should be funded to ensure clients receive sufficient/high quality settlement support.
	<ul style="list-style-type: none"> • Maintain APOs, however only have family as proposers (this will streamline the process).
	<ul style="list-style-type: none"> • The APO model does not require an overseeing body, SCOs should be able to make decisions as a team.
	<ul style="list-style-type: none"> • Under the CSP, the number and/or capacity of APOs should be significantly expanded to enable lodgement of applications by proposers based in any state or territory of Australia and in both metropolitan and regional areas.

s. 47G(1)(a)

- Consider allowing organisations to lodge CSP applications independently, rather than through an APO.
- All people proposed under the CSP should receive routine needs assessments during the initial period of settlement to ensure that they are receiving adequate on-arrival support.
- The APO model could work in the CSP, however the role and responsibilities of the APO need to be clearer and there needs to be effective monitoring of the work of the APO and accountability for the services they provide, particularly given the significant fees they earn in administering the programme.
- The current APO model is appropriate for CSP, but design and implementation should be informed by external review.
- APOs should not assess applications.
- The APO model can be further refined to administer a CSP. The APO model is the crucial link between the Community and Government (The Department). The establishment of additional 'layers' within the system (whether volunteer-based or community/faith-based) would lead to higher monitoring/compliance costs for the Department and/or the APO.
- The APO model being used in the CPP is appropriate. Allowing any organisation to propose would create too much congestion.
- The APO model can place a lot of strain on the designated proposing organisation from within their communities.
- APO model is workable and appropriate for the Community Support Programme — it is impartial and rigorous.
- Should be one APO in each state and territory to conduct assessments and manage applications from proposers in that state.
- APO model should be retained, but improved to ensure that they are not acting as migration agents (and are appropriately engaged with migration lawyers), and that they have additional funding to monitor settlement outcomes.

Other comments

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> • Expand the number of places available (makes it more economically viable for APOs). • DIBP needs to work with refugee community organisations and other community groups to clarify the role of SCOs in the CSP and facilitate greater involvement of these organisations in the programme. • High costs limit individual's ability to access the CPP. • Under the CSP, applicants in all states should be able to apply. • Sponsors should be required to sign an agreement with DIBP and be regularly monitored, perhaps in partnership with the HSS programme. • There is a potential for an increased role of SCOs in a full programme to link clients with employment and other resources.

Who should be eligible for a humanitarian visa in a Community Support Programme?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> Maintain eligibility for humanitarian visas as is (persecution and discrimination).
	<ul style="list-style-type: none"> Focus the programme on reuniting families who would otherwise be unlikely to gain entry to Australia through any other visa programme, who are in dangerous and vulnerable situations. In-country applicants should be eligible.
	<ul style="list-style-type: none"> A family connection should be required — though utilising a broad definition of ‘family’. Identification of refugees in the CSP should be sponsor-driven, not s. 47G(1)(a) driven. s. 47G(1) recommends that eligibility be assessed with primary reference to vulnerability and the individual protection circumstances of given applicants in respective countries of asylum.
	<ul style="list-style-type: none"> CSP applicants should be required to meet all criteria for a humanitarian visa.
	<ul style="list-style-type: none"> In-country applications should be permitted.
	<ul style="list-style-type: none"> In-country entrants should be considered under CSP.

General comments

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> In conjunction with settlement agencies, DIBP needs to develop guidelines for determining ‘high needs’ and the capacity of families to support them.
	<ul style="list-style-type: none"> In a CSP, all applicants would be mandated by UNHCR to ensure applicants have met the criteria for consideration. DIBP would ensure that clearances are obtained for security risks and health related issues (those conditions that pose a risk to the community) with respect to the applicants being appropriately verified. In addition, the Department would assist the APO’s with all security and other relevant ‘clearances’ for the proposer(s), prior to an application being lodged.

Should the CSP target applicants likely to settle more quickly, and vulnerable applicants?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> Do not support making visa grants based on refugees who will settle more quickly. The highly vulnerable shouldn't be settled through CSP – risk that they become targets for sexual/physical/economic exploitation. They require specialist settlement services. There is risk that longer settlement processes will put financial pressure on the sponsor as well as on relationships which could result in referral to DSS Complex Case Support Service. Those with serious pre-existing medical conditions may lead to slow settlement and long term social and economic burdens on the proposer, which could result in them opting out.
	<ul style="list-style-type: none"> Concerns around using stricter health requirements as eligibility criteria due to difficulties with diagnosing serious medical conditions. Question how in-depth medical screening would be practically implemented, and what the subsequent impacts might be (esp. given that the programme was designed to offer refugee protection).
	<ul style="list-style-type: none"> Refugees with English language proficiency and employment settle more quickly and easily. Women at risk and torture victims are usually happier to settle in a smaller, safer community which offers ongoing community support and care. People with serious pre-existing medical conditions must be carefully settled in an area with the appropriate health care facilities to ensure that their condition is managed. Most settlement teams have a nurse or doctor on their board.
	<ul style="list-style-type: none"> Eligibility for a humanitarian visa in a Community Support Programme should be based on refugee status, strong family links in Australia and the capacity of the family to provide comprehensive support and not on other considerations such as employability, health, age, English proficiency etc.
	<ul style="list-style-type: none"> The CSP should not place restrictions on eligibility relating to a person's: <ul style="list-style-type: none"> likelihood of settling quickly upon arrival in Australia, on the basis of criteria such as English language skills, age or employment skills and qualifications vulnerability or complexity of their needs, provided that their proposer can demonstrate capacity to provide adequate settlement support links to individuals who previously arrived in Australia by boat.
	<ul style="list-style-type: none"> If the programme is not supporting highly vulnerable humanitarian entrants (including those with health concerns), the visas offered should be additional to the Humanitarian Programme, rather than taken from within it.
	<ul style="list-style-type: none"> Apart from health, character and security requirements, there should be no other targeting of entrants. Screening on subjective factors carries a risk of a lack of transparency in the criteria underpinning decision making. Apply a uniform and consistent approach to the health requirement in all streams of the migration program, including CSP.

s. 47G(1)(a)	<ul style="list-style-type: none"> Targeting applicants could achieve better settlement outcomes in a shorter time frame, fewer relationship break downs, reduction in monitoring/compliance costs for DIBP and APO, better cohesion within family groups/communities, adds to feasibility of increasing annual intake. Targeting of applicants may also give the perception that a CSP is 'discriminatory' as it focuses on those that only pose a 'lower settlement risk'. The challenges with adequately screening/identifying applicants who are 'likely to settle more quickly'.
	<ul style="list-style-type: none"> S. 47G(1) recommends that access to places within the existing Humanitarian Programme not be limited according to factors relating to settlement prospects, including language ability or high needs. Should be a diversity of humanitarian caseloads, and a balanced distribution of profiles (women, men, children, families, single), so as to not prejudice particular refugee groups against others who may be perceived as having better integration potential.
	<ul style="list-style-type: none"> It is difficult to ascertain which applicants are likely to settle more quickly if people are from a refugee background. Age, English language, and stricter health requirements are discriminatory and at odds with humanitarian values.
	<ul style="list-style-type: none"> Does not support English, age, or skills requirements as this would be discriminatory, and may suggest the applicant does not have a humanitarian claim.
	<ul style="list-style-type: none"> Eligibility should not include the ability to speak another language (in this case English), a person's age or health requirements stricter than those already in place. It is the proven capacity of the proposer and the rigor of the APO's assessment that should count in the CSP, rather than additional criteria or characteristics attached to the applicant (beyond the existing criteria for all humanitarian applicants).
	<ul style="list-style-type: none"> CSP applicants should be subject to no stricter eligibility criteria than existing ref and hum criteria. Eligibility should be targeted to support those who need it most, rather than operate on a purely 'first in, first served' basis.
	<ul style="list-style-type: none"> Targeting applicants will not achieve better/quicker settlement outcomes. Refugees shouldn't have to demonstrate English proficiency for a Humanitarian Visa. It would be difficult to draw a line between which applicants are vulnerable people and which are not.

Priority processing

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> Priority processing will lead to the community questioning the integrity/transparency/equity of the Humanitarian Programme. Priority processing would lessen the queue for humanitarian applicants who don't have families to sponsor them, also address community concern around family reunion.

ss. 47G(1)(a)	<ul style="list-style-type: none"> • Priority processing would be helpful – clear time frames allow training and preparing the community support team easier.
	<ul style="list-style-type: none"> • Applications lodged under the CSP should receive the same processing priority as applications lodged under the SHP, with humanitarian need being the primary criterion for prioritisation under both programmes.
	<ul style="list-style-type: none"> • CPP priority processing is advantageous for those that can afford it, and disadvantages those who can't. The latter are further disadvantaged as they can't apply yet the visa places are being taken from the only pool that they are eligible for (broader Hum programme).
	<ul style="list-style-type: none"> • As proposed in the CSP, priority processing seems to be based solely on the capacity and willingness of the proposer to pay, not on any need.
	<ul style="list-style-type: none"> • Priority processing could result in negative community perceptions that priority is being given to those refugees whose family/community can pay the fees, rather than on fundamental principles of equality. • Priority processing under CPP has been a welcome component, avoids refugees being forced to languish for long periods of time in situations where they face insecurity and hardship. Relieves pressure on their family Australia.
	<ul style="list-style-type: none"> • Priority processing, particularly when places are drawn from the Humanitarian Programme, benefits those with the ability to pay, and disadvantages those more vulnerable.
	<ul style="list-style-type: none"> • Priority processing disadvantages those who may have a more pressing claim.

Could the CSP be used to settle people with no links in Australia to regional areas?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> • Positive – there may be more skill-suited work available, better sense of belonging in small communities, permanent work may result in smaller communities supporting the applicant in a more coordinated way. • Negative – insufficient settlement support or established ethnic communities in smaller regional areas, seasonal work cannot support families, transport/accommodation is difficult, not enough mainstream services (health, transport, education). • People with no links generally settle well in regional areas. Kinder/less threatening environment for stressed and traumatised people. Well organised community support team required to help people become independent quickly. • It is important that people are settled in a centre with appropriate services and help for new arrivals, such as Coffs Harbour, and Albury Wodonga, and preferable if there are others from a similar background.

	<ul style="list-style-type: none"> It is unclear who would pay the costs and provide settlement support for humanitarian entrants who do not have links in Australia. Regional settlement can be appropriate if there are appropriate support services (English training, language support, cultural and religious activities, employment opportunities).
	<ul style="list-style-type: none"> A lot of support is required for settlement of entrants with no family links.
	<ul style="list-style-type: none"> The Humanitarian Programme considers regional allocation levels and the balance of refugee arrivals from overseas, allocating unlinked families to often regional areas. If the CSP were to feed into this it would support planned refugee community development.
	<ul style="list-style-type: none"> s. 47G(1) do not support settlement of entrants with no links in regional areas due to concerns around support services, personal links, employment prospects, exploitation, social exclusion, and community tension due to small pool of jobs.
	<ul style="list-style-type: none"> Advantages - entrants contribute to areas with smaller populations and workforces Disadvantages - a lack of appropriate services and possible difficulties integrating.
	<ul style="list-style-type: none"> Entrants should only be resettled in non-metropolitan locations if the levels of community services and social/economic disadvantage are unlikely to jeopardise settlement outcomes and there is strong community support.

Should a Community Support Programme include an Assurance of Support (AOS) requirement?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> Will discourage some applicants, deter clients who don't have the means but are able to settle clients Could create a debtor-creditor relationship.
	<ul style="list-style-type: none"> Support 10 year AOS, with bank guarantee.
	<ul style="list-style-type: none"> AOS is not necessary. Voluntary time and work already provided at no cost, raising this money will not be easy for the community, will make it impossible for the most needy people to propose their family as they struggle with money.

s. 47G(1)(a)	<ul style="list-style-type: none"> • An AoS can lead to pressure on family/community relationships, family breakdown and estrangement, homelessness, and exploitation of new arrivals. • It would undermine the humanitarian intent of a CSP by ignoring the additional challenges and barriers that refugees face in entering the workforce. The critical period of settlement and adjustment to a new country must be supported with access to social security, without the prospect of these payments becoming a debt for their proposer.
	<ul style="list-style-type: none"> • The VAC associated with the CSP should be substantially reduced and replaced with an AoS requirement lasting 12 months. • The AoS requirement should be designed to cover the costs of providing settlement support during the first 12 months of arrival in Australia, not the costs associated with income support.
	<ul style="list-style-type: none"> • An AoS may lead to a greater risk of relationship breakdowns, and pressure on the entrant/s to take any kind of job to avoid the costs associated with an AoS, rather than looking for a more appropriate long-term job. • <i>'...humanitarian entrants do not need the kind of "encouragement" suggested by the introduction of an AOS to enter the Australian workforce...'</i> • Due to rental prices, entrants may live with the proposer for a protracted period, reducing the potential for independence/self-sufficiency, may result in proposer/entrant relationship breakdown.
	<ul style="list-style-type: none"> • The proposed AoS places an additional financial burden on the client's proposer and, in the event that they do access government and welfare services, this AoS can place additional financial stress on the proposer. • The payment of a bond by the proposer for settlement obligations should be retained, but that an AoS provision for essential government and welfare services is not adopted in the CSP.
	<ul style="list-style-type: none"> • Proposers actively encourage applications to gain an independent and regular income, in order to move away from income support through Centrelink. • Not all applications have a primary applicant who could successfully achieve an independent and regular income stream. • A regular income is only one element of successful settlement. s. 47G questions the value of an AoS being incorporated into the operations of a CSP, notwithstanding that it will be an additional 'less controllable' cost to the Proposer. • A CSP must recognise that NOT all primary applicants will have the capacity/ability to secure ongoing employment.
	<ul style="list-style-type: none"> • Does not support an AoS. Humanitarian entrants wish to make the most of opportunities for education and employment. While there are short-term costs to government, the difference is made up through participation in the social and economic community over time. • Entrants should be given time to settle, learn about Australia, and become job ready through English language courses. • AOS stresses relationships between proposer and entrants, inhibiting effective settlement. • The APO fees should be capped. • The use of a VAC should be transparent, and surplus VAC should be refunded. • People have taken out loans in order to access the programme.

s. 47G(1)(a)	<ul style="list-style-type: none"> Does not support AoS — increases risk of tension between proposer and entrant.
	<ul style="list-style-type: none"> Does not support an AOS — AoS does not consider hardships that entrants may suffer on arrival, and could lead to situations where entrants become homeless or lead to mental health issues. Not all in humanitarian need will have the capacity to afford an AoS.
	<ul style="list-style-type: none"> The future Community Support Programme model should consider building in effective ways to get entrants into employment as soon as possible to both further their own settlement and to limit the need to access welfare payments. There may be useful insights from models used in other countries to consider in this light.
	<ul style="list-style-type: none"> Does not support an AoS, but the VAC could be increased to around \$25,000 to further offset costs related to healthcare and income support. The VAC is less costly to administer and provides a known income stream.
	<ul style="list-style-type: none"> AMES recommends continuation of an APO bond scheme, as is currently used in the CPP.
	<ul style="list-style-type: none"> An AoS should not be required, particularly if the VAC is to remain at the same price.
	<ul style="list-style-type: none"> Attaching an AoS to a humanitarian visa, could be seen as a breach of international obligations under the ICESCR by diminishing the social protection Australia currently affords to Humanitarian visa newcomers.
	<ul style="list-style-type: none"> An AoS is at odds with the basic objectives of the Humanitarian Program.
	<ul style="list-style-type: none"> An AOS leads to inequality through finances and does not consider settlement barriers faced by humanitarian entrants.
	<ul style="list-style-type: none"> Community members are generally content to pay the considerable Visa Application Charges, as well as the Approved Proposing Organisation fees that are considered a de-facto Visa Application Charge, on the premise that their family members living abroad, displaced from their country of origin and often living in horrific conditions, and have their visa applications granted under priority processing.
	<ul style="list-style-type: none"> Do not support an AOS, as it may compromise settlement, lead to a vulnerable underclass, put additional pressure on the relationship between the proposer and entrant, may have long term negative impacts, financial hardship already a factor in in refugee communities – additional pressure will exacerbate.

Approaches to assist securing employment

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> Employment services with cultural awareness and the ability to job match with pre-gained skills will lead to better employment outcomes.
	<ul style="list-style-type: none"> Finding employment is best done through personal community links. Employment agencies unsuccessful in understanding needs, and finding employment for refugees.

s. 47G(1)(a)	<ul style="list-style-type: none"> Families have significant social capital which can facilitate employment opportunities for new arrivals. Given the expected role of families in a Community Support Programme, it is important for families to be informed about employment services and to utilise their networks to facilitate entry to the job market.
	<ul style="list-style-type: none"> Employment can be assisted through AMEP, other English programmes, labour market programmes i.e. Jobactive. Labour market services need to be sufficiently aware of and sensitive to the needs of refugees, particularly torture and trauma survivors.
	<ul style="list-style-type: none"> People proposed under the CSP, are likely to need tailored assistance to successfully transition into the labour market which may include skills and qualifications recognition, bridging training and English language learning, opportunities to gain Australian work experience and access to employment support.
	<ul style="list-style-type: none"> Ideally, proposers under a CSP should include an 'employment strategy' as part of the Application. The strategy would include plans for orientation, training/education and skills development, leading to an assurance of employment, prior to the lodgement of an application. Not all Proposers have the capacity and/or the expertise to explore and develop such initiatives. Therefore, as a practice/procedure under a CSP, the Proposer/SCO could work with Jobactive, as part of completing their application.
	<ul style="list-style-type: none"> Finding employment is hindered by; limited English proficiency, recognition of skills, qualifications and experience, lack of employment services supporting transition.

What is the role of communities in contributing to the Community Support Programme?

Org	Key comments
s. 47G(1)(a)	<ul style="list-style-type: none"> VAC can create a huge financial stress on client and proposer, leading to negative impact on settlement. VAC should be based on partner stream entrants – better affordability and doesn't compromise the values of the Australian government. Disadvantages of VAC and AOS – those in need of resettlement yet have no resources for the VAC do not have the opportunity for resettlement in Australia. Advantages of VAC and AOS – fast track priority, no financial burden on Australian government.
	<ul style="list-style-type: none"> VAC should cover cost of visa - similar to skilled migrant, where the entrant has to support their own family for 2-3 yrs (resulting in minimal financial burden to the Australian Government). Families should be responsible for providing support services for the length of the programme (not just one year).

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- Longer term benefits are likely with greater involvement of proposers, family members and community members in providing initial settlement support (however they must have a solid understanding of programmes and policies and not rely on their own past experiences).
 - Concern around having a fee structure for refugee visas, assessing resettlement capacity and employability factors as eligibility criteria, or having any criteria which is not connected to humanitarian concerns of refugee protection.
 - Community organisations require strong internal governance structures to ensure they can adequately fulfil responsibilities involved in supporting families entering through the CSP.
 - Cost factors may limit the ability for mainstream volunteer communities to be involved.
 - Bulk of fees/charges should be incurred upon grant of a visa.
 - Provide VAC concessions for larger families.
- There does not need to be a VAC for Humanitarian entrants. The services provided under the HSS Program are not needed when a community support team is well trained and experienced, and can provide all aspects of settlement assistance and ongoing help.
 - If a VAC is required it should only be a minimal amount, as the community can cover most of the needs. The airfares should always be on a no-interest loan scheme, to be gradually repaid, thus ensuring that there are ongoing funds to help others.
 - A VAC would make it more difficult, as people already selflessly give so much time, energy, knowledge and care to assist new arrivals, and much of it outside regular office hours.
- The high level of the VAC, and other upfront/ongoing costs of sponsoring family members, renders the programme to be unattainable for many communities and community members.
 - If the VAC is applied, the visa places offered under the Community Support Programme should be outside the Humanitarian Programme allocation.
 - Using a VAC in conjunction with an AOS will only make the programme more unattainable.
- The VAC should be as low as possible to allow all people in Australia with family and community connections in humanitarian situations overseas to have fair and equitable access to propose suitable applicants to APOs for consideration by the Department.
 - Using a VAC in conjunction with the AoS compounds the significant financial burden on proposers.
- Resettlement through a Community Support Programme, with a VAC would present a cost-effective means of caring for family members.
 - In order to achieve a cost neutral programme, the VAC should be representative of:
 - the cost of social support based on the Applicant family composition (full or partial cost recovery)
 - overseas Processing costs (full or partial cost recovery)
 - the Department's administrative costs for the Programme (full or partial cost recovery).

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- As part of a commitment to service assurance, a CSP would also establish timeframe benchmarks at each of the overseas posts:
 - application received at overseas post; approximate date of interview; approximate date for completion of verifications – circumstances, security, medical, other; approximate date for an Application outcome – acceptance/refusal; approximate date for Visa issuance & exit permits; and approximate departure date.
- Proposers should be trained in delivering settlement support before entrants arrive — perhaps by APOs.
- VAC should be around \$15,000 to \$25,000 as that is a much more affordable range.
- To have a VAC in conjunction with an AoS is to deeply disadvantage majority of people seeking a humanitarian visa as it becomes too costly for them to afford.
- There are families that are paying more than the VAC to keep their family members overseas alive and so would be willing to pay the VAC and AoS if it means getting their family members to safety. It would also act to filter applications.
- VAC fees should be reduced if the program numbers are to be treated as part of the Australian Refugee & Humanitarian Program. VAC fees should not increase if program numbers are counted separately.
- The VAC should properly be seen as a community contribution to assist in expanding the availability of humanitarian visas and covering some costs involved in the administration of a CSP. The VAC amount should not be directly linked to the cost of the HSS program or to Centrelink income amounts, as this creates an uncomfortable accounting exercise and devalues the other contributions made by refugees and humanitarian entrants.
- The current VAC and APO charges seem to be set at a level that is relatively attractive for sponsoring family members.
- If the same VAC is applied in a community support programme, it can be argued that the contribution being made to the consolidated revenue generated should be appropriately acknowledged by decreasing the processing time of the application.
 - However priority processing may break the principle that applications should be processed mainly according to merit and need.
- VAC and AoS may force entrants into the workplace early, working well below their skill set and ability. It would be more beneficial for the Humanitarian visa newcomers if they were granted social security payments to allow them to concentrate on improving their English language ability and transitioning to Australian society.
- It must be recognized that private sponsorship does not rely on public resources, but funds of family members, ethnic groups and other community associations.

What settlement support should be available for humanitarian entrants under a community support programme?

Org	Key comments
S. 47G(1)(a)	<ul style="list-style-type: none"> Proposers should provide day to day orientation, long term accommodation, collaboration with APO on settlement support. Community/family – less costly to government, clients feel more confident working with people with the same cultural values/understandings, proposers have experience settling in Australia.
	<ul style="list-style-type: none"> A CSP must be required to commit to providing care and support, airfare loans, and complete settlement assistance. This would include helping with potential employment, once the people are settled. Proposers for relatives should be expected to commit to assisting them as much as possible with all settlement procedures. The challenges are usually finding affordable and appropriate housing and work.
	<ul style="list-style-type: none"> Entrants should not be eligible for HSS, but should be eligible for Settlement Services and CCS (as a safety net).
	<ul style="list-style-type: none"> Entrants should be granted access to HSS in cases of emergency or relationship breakdown, which would be taken out of the AoS - if required. Entrants should be eligible for torture and trauma rehabilitation services and CCS on a needs basis.
	<ul style="list-style-type: none"> Under the CPP, the settlement responsibilities of proposers and the time period they are expected to provide support (12 months) are reasonable. Entrants should have access to torture and trauma services. There should be a safety net to support people who face greater difficulties. Entrants should be able to access <i>Jobactive</i> and other labour market services as well as the full allocation of AMEP hours. Training and/or information sessions should be available for proposers before the entrants they have sponsored arrive. Benefits of community/family members providing support include: <ul style="list-style-type: none"> they generally speak the language the same language as entrants, and understand cultural issues family members in particular often have a close connection and relationship with the people they are supporting. Challenges associated with SCOs providing support: <ul style="list-style-type: none"> They can spread the load of the tasks required to support entrants among different members, however this can also lead to fragmentation, inconsistent information and support, and a lack of accountability. They may not be aware of current services available. They may also not have arrived in Australia as humanitarian entrants themselves, so may not understand the particular issues for humanitarian entrants. Sponsoring organisations may not include members from the same cultural or religious background, so may face communication difficulties and cultural misunderstandings.

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- Proposers should provide all aspects of on-arrival support and refer entrants to appropriate services.
- APOs or HSS providers should intervene if proposers are unable to adequately meet their settlement obligations.
- Benefits of community members/organisations providing settlement support under the CSP, is their potential capacity for entrants to get support from their own cultural and linguistic community networks.
- The potential disadvantages are that communities and individual proposers may struggle when critical settlement issues arise and may themselves be unaware of service pathways and referral networks to address these issues.
- The benefits far outweigh any challenges associated with having community members and/or organisations provide settlement support under a CSP.
- Sponsors should have the option of paying for HSS, where they are unable to provide adequate settlement support.
- A Government-funded 'safety net' should be available.
- CSP entrants should have access to the full range of Humanitarian settlement services including counselling, case management and orientation.
- CSP entrants should be referred to *Jobactive* providers.
- Provision of full allocation of AMEP hours at no cost is essential.
- CSP entrants should be informed of their obligations and the services they can access prior to arrival in Australia.
- Should have access to torture and trauma services.
- There should be a 'safety net' in case of relationship breakdown or unexpected difficulty.
- Should be referred to *jobactive* for professional employment services and should receive full AMEP.
- Current suite of settlement services in the CPP is appropriate.
- Income support and mental health services should be provided.
- Proposers will ideally need to ensure that they have a network of contacts, employment options, language courses, resettlement services, cultural orientation, adequate housing and access to social services.
- The support of an existing and established community with resources would ensure that they are able to immediately respond to the newcomers needs for housing, schooling and general welfare services to cushion the often difficult resettlement process.
- Proposers should ensure that entrants are provided with everything they need to become self-sufficient, and provide a secure and supportive social network with groups that share common interests and a common background.
- Vulnerable applicants should be able to engage s. 47G(1) and other similar organisations which provide a range of therapeutic programs to address the needs of people with a history of psychological and physiological trauma.
- Maintain all elements of HSS.

Assistance achieving self-sufficiency

Org	Key comments
ss. 47G(1)(a)	<ul style="list-style-type: none"> By assisting entrants in a careful and respectful manner to ensure that things are not done 'for' them, but 'with' them. Also by introducing entrants to community members who can assist with work experience and educational help is important.
	<ul style="list-style-type: none"> The proposer should regularly meet with the APO and client, perhaps in the first 6 months after arrival, to allow the APO to monitor progress towards key competencies and orientation requirements. These competencies and requirements could be adapted from those required under HSS. Settlement competencies and orientation should be delivered in a staged but comprehensive way after arrival as currently occurs in HSS.
	<ul style="list-style-type: none"> Self-sufficiency could be encouraged through a standard initial orientation program, delivered over a short time period by the APO. This would be a program developed by the APO consortium. The sessions would be attended by both the Proposer/SCO and the Applicant(s). Interpreters would be engaged to ensure clear understanding.
	<ul style="list-style-type: none"> Entrants are best supported into employment by accessing English language tuition and by teaching them employment skills, as well as support to settle in Australia and overcome traumatic experiences.