

	A	B	C	D	E	F	G
1	Questions	s. 47G(1)(a)					
2	1. Would a pilot of a private/community sponsorship program for refugees be feasible?	brief submission stating that they have sponsored refugees from Dadaab in the past and that they welcome the pilot	yes, believes that the Australian Government could operate a similar Program to that of Canada.		A pilot of this sort is definitely feasible, given the positive response of the mainstream Australian public to the proposal that citizens provide places in their homes for asylum seekers on Bridging Visas. There is also evidence for Canada that a scheme like this could work well.	yes	welcomes scheme. Believe that sponsoring bodies would not hesitate to sign an agreement/undertaking to play their specified role in supporting the resettlement of refugees.
3	2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?				A concentration on refugees from groups which have proven to require very little settlement assistance, such as the Burmese, could increase numbers without significantly increasing costs. This option would, however, go against the principle of providing resettlement places to those most in need.	Some of the foreign aid Australia provides can be used to provide means for the citizens, to encourage them starting the country they reside in. For example s have to leave Northern Iraq due to financial condition and the turmoil at the time. Aid will help provide work opportunities which will help reduce or stop refugees of the area seeking migration and will encourage them to return to their own towns and villages.	

	A	B	C	D	E	F	G
Questions		s. 47G(1)(a)					
1							
3. Who should be able to sponsor refugees under a pilot?			<p>*SAHS - incorporated organisations that have signed formal agreements with the Australian Government.</p> <p>*Community organisations - can hold up to 2 cases per year; and</p> <p>*Groups of five - must be PR's or citizens</p>		<p>* In the first instance, any Australian permanent resident should be considered.</p> <p>*Other considerations should be a satisfactory police clearance, proven experience with and understanding of Australian systems and culture, and at least functional English</p> <p>* Volunteers identified through an advertising campaign</p>	individuals, community organisations or combination of both	

	A	B	C	D	E	F	G
	Questions	s. 47G(1)(a)					
1							
	4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?				<ul style="list-style-type: none">* Police clearance* Evidence of English proficiency* Evidence of successful settlement (for people who have resettled or been resettled in Australia)* Evidence that the Potential sponsor understands the implications and responsibilities of settlement* Evidence that the potential sponsor has the financial capacity to successfully sponsor	current government vetting and checking procedures with emphasis on financial means and legal aspect of sponsors will be sufficient.	

	A	B	C	D	E	F	G
1	Questions	s. 47G(1)(a)					
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?		*BV holders - particularly 'stateless' BV's *people with refugee claims that are in Indonesia - this would reduce incentive to get on boat.			Sponsorship parties may submit proposal through Immigration Departments in Australia. Priorities should be based on potential of the refugees in building their future in Australia - children of school age and preferable with skills partners and adults.	would want to sponsor people on the advice of headquarters in Pakistan, who identify the lost vulnerable applicants on the basis of persecution suffered by them.
7	6. What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?				*Continuation of the present scheme of identification for resettlement of offshore refugees who will sponsor them *Addition of those identified as linked through family members in Australia who will sponsor them	it is expected the Australia Government and UNHCR have established criteria identifying refugees for sponsorship. However consulting with community organisation with their knowledge and experience will complement their task.	

	A	B	C	D	E	F	G
1	Questions	s. 47G(1)(a)					
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?				<ul style="list-style-type: none"> * Responsibilities currently undertaken by HSS providers * Undertaking to provide services currently provided under HSS 	The sponsors must understand the financial commitments they are undertaking, and be prepared to provide essential settlement requirement such as travel, residence and orientation expenses.	The refugees should generally pay for their own medical checks and travel costs. However if they need help with this the sponsor will assist. The refugee will be received at the airport by our association. They will be provided free boarding and lodging for the first few weeks until they can find their own. they are provided with orientation and information concerning the benefits provided by settlement services, the opening of bank accounts, giving information about Medicare, being a travel guide and showing them how to join English classes, educational and VET courses. Group will sign an undertaking that they will do the above without any financial assistance from DIAC.
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?				Yes, Services defined as under current HSS contract provisions. Length of time up to two years after arrival	limited to 24 months	

	A	B	C	D	E	F	G
	Questions	s. 47G(1)(a)					
1							
	9. Should a sponsored refugee be eligible for HSS services?				no	no	
10							
	10. What government services should the refugee be able to access once they are in Australia?				All services available to permanent residents, as well as SGP and AMEP	Medicare, PBS and basic education expenses subsidies	Centrelink and Medicare will continue to be provided
11							

	A	B	C	D	E	F	G
	Questions	s. 47G(1)(a)					
1							
	11.How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?				*A contract with KPI's and a timeline *Checks of contractual compliance every two months after arrival	periodical reporting and checking mechanisms, maybe in quarterly or semi-annual intervals.	Government may monitor the discharge of our responsibilities as a sponsoring association,
12							

	A	B	C	D	E	F	G
1	Questions	s. 47G(1)(a)					
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?				*A contract with KPI's and a timeline *Checks of contractual compliance every two months after arrival *a helpline widely publicised to sponsored refugees available in all languages for sponsored refugees to report concerns	binding undertaking stipulating all the obligations of the sponsors including evidence and checking mechanisms	
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?				contractual compliance enforced with financial sanction for non-compliance	a bond is an effective incentive and should play a pivotal role.	

	A	B	C	D	E	F	G
1	Questions	s. 47G(1)(a)					
15	14. Should sponsored refugees exit the scheme after a certain period?				yes, after 2 years	yes, with 24 months	
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?				if sponsorship fails, based on contractual compliance and/if feedback from the sponsored refugee substantiated by other evidence, the sponsored refugee could be moved to another sponsor or referred to the HSS program.	yes. The government may consider the requirement for a second or multisponsor under the program	
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?				Training for sponsorship (s. 47G(1)(a) willing to provide training)	Consider providing temporary relief or concession in case of unforeseen financial or other hardships that the sponsor may be faced with	

	A	B	C	D	E	F	G
	Questions	s. 47G(1)(a)					
1							
17.	Should there be any sanctions if sponsors fail to meet their responsibilities?				no	yes	
18.							
18.	Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?				yes	yes	
19.							

	A	H	I	J	K
	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)s. 47G(1)(a)
1					
	1. Would a pilot of a private/community sponsorship program for refugees be feasible?	scheme has merit, but there are many potential obstacles that would require significant planning to avoid.	welcomes program and are happy to support the substance of the proposal in principles, recognising the department may be best places to design the parameters of the pilot in detail.	views the program as a way to sponsor orphans from Indonesia. Australians that are able to show a significant connection with a you child or young person should be able to apply for a visa for that child to reside with them in Australia. The relevant state would conduct checks on the sponsor. the gov would provide Medicare, educational services. Sponsor would financially provide for child until they are 18.	feasible but must be designed and implemented with care. Will need evaluation Should encompass both regional and metro - considers saving to be around \$15,000 for the gov in the following areas: airfares, household furnishings, whitegoods, initial HSS services, routine SGP services
2					
	2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?	If Australia considered hostel style accommodation for asylum seekers as they have in Australia, the cost would be saved on mandatory detention and could be diverted towards speeding up the process of assessing people claims for asylum or increasing the number of offshore people they accept.			as an alternative, or an additional measure that could be implemented to increase the intake, services could be provided through public sector organisation as they are now but funded through public donation or subscription (similar to child sponsorship programs). Donations could be in kind or directed to a particular service
3					

	A	H	I	J	K
	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)s. 47G(1)(a)
1					
	3. Who should be able to sponsor refugees under a pilot?	Community organisations, NGO's and well resourced individuals. These organisations and individuals should have some level of experience with asylum seekers/refugees or be trained at their own cost in order to be prepared to take on the role of a sponsor.			The approach taken by Canada seems reasonable. * larger organisations with greater resources who sign formal sponsorship agreements - could be charities, ethnic groups, corporations with adequate human resources *smaller community groups based in one location - could sponsor small numbers, These groups could sign an undertaking - raise money from community donations *individuals of small groups of individuals *gov should draw on groups with settlement experience.

	A	H	I	J	K
1	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)s. 47G(1)(a)
	4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?	police checks - particularly to limit risk of paedophiles and people involved in human trafficking.			<p>*groups already known to Gov will require less checking - they could produce annual reports, financial statements and evidence of their dealings with refugees.</p> <p>* smaller regional/community based organisation could be required to show: registration of the organisation as an association, corp. etc, copy of their constitutions, policies for settlement, evidence of financial viability or access to finance such as loans from IOM, DGR status, police checks, working with children checks, evidence of, or proposals for cultural diversity courses, training for volunteers in working with children, and trauma victims.</p> <p>* Individuals or families: evidence of financial status, police checks, personal references, evidence or, or proposals for cultural diversity courses, training for volunteers in working with children, and trauma victims.</p>

	A	H	I	J	K
	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)s. 47G(1)(a)
1					
5.	How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	people already identified by UNHCR as eligible for resettlement except where it is a family member prosing applicants and then their case should be assessed unless the UNHCR has already identified them as requirement resettlement.			<ul style="list-style-type: none"> * Australian gov in consultation with UNHCR * people who have been on waiting lists. * individuals and organisation should be able to nominate specific applicants - as they do under SHP, who have been identified as suitable candidates for that particular * in part s. 47G(1)(a) have given preference to single mothers with children . However another option could be to take into account education, work and other aspirations. *family reunion is desirable, but should not decrease the intake. Priority should be given to those who have been in camps the longest and where there are you children. *selection should not be based on financial means or employability as this would undermine the fundamental purpose of the Hum program.
6.	What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?	controlled by Gov. however is a community group has a connection with a refugee that has been identified by the UNHCR as eligible for resettlement then they could specifically request to sponsor that person.			
7.					

	A	H	I	J	K
1	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?	Family members who are sponsors would not be required to have the same level of financial responsibility as community organisations or others as they are likely still establishing themselves. Community organisations and other individuals should be required to meet at the airport, assist with setting up bank accounts, centrelink, Medicare, school enrolment etc. Assistance finding suitable housing for the refugee with back up assistance available through HSS if required.			<p>*all potential sponsors to produce a proposal with details of numbers, accommodations, services etc to be provided.</p> <p>* role should be similar to SHP program</p> <p>* Sponsor should: provide pre-departure support, orientation, organise travel, pay fares,</p> <p>* accommodations arranged, furniture could be donated by community - there could be an agreement with the refugee that they will, overtime, refund the airfares and, make some contributions towards cost of initial rent and furnishings</p> <p>* s. 47G(1)(a) would try and find accommodation that is similar cost to the rent assistance provided by centrelink. Accommodation would be in refugees name, but arranged by s</p> <p>*providing assistance with banking, shopping, schools, AMEP, transport.</p> <p>*arranging counselling, medical checks and other health services.</p> <p>*arranging enrolment with employment agencies where feasible and assisting nominees with job seeking, driving instruction and technical training.</p>
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?	yes			not less than 6 months and up to 2 years. Needs based.

	A	H	I	J	K
1	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)
10	9. Should a sponsored refugee be eligible for HSS services?	some HSS should be available as a back up if the sponsor is not able to fulfil responsibilities.			s. 47G(1)(a) will work with HSS providers and share responsibilities to ensure optimum care. s. 47G(1)(a) could assume day to day tasks provided by HSS and Northern Settlement Services, thus reducing costs. HSS and SGP be used to supplement sponsor, particular for torture and trauma victims
11	10. What government services should the refugee be able to access once they are in Australia?	all services the PR gets. Also the purchase of household goods at cost price from HSS.			*AMEP (520 hours + access to childcare) *school ESL and school education orientation programs * Medicare * STARTTS (nsw) *TIS *Complex case support services *centrelink funding - the same as what SHP gets * possible special refugee benefit and then after a year go onto normal centrelink

	A	H	I	J	K
	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)
1					
	11.How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?	refugee should be aware of a settlement service that they can contact if they have a problem with their sponsor. Maybe a DIAC worker would be in contact with the refugee once every 1-2 months to assess how it is going.			* periodic reporting against specific benchmarks. *spot checks of sponsor * feedback from recipients * monitoring similar to 457 visas. Similar obligations and sanctions on sponsors of refugees could be imposed as with 457. *if organisation does not meet requirements, it should be advised that it can no longer sponsor. New sponsor could be arranged. *
12					

	A	H	I	J	K
1	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?	follow up			* helpline for sponsors to get support * training by gov
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?	a bond maybe a way to encourage community organisation and non related individuals, however this would be based on the sponsor having provided satisfactory effort not necessarily their 'success' in assisting the refugee. Family members who sponsor should not have to provide a bond.			* bond not appropriate *consideration could be given to requiring sponsors to contribute in advance to a fund which could be drawn on to finance some of the settlement services. * maybe in form of trust fund * this would ensure adequate resources are available for settlement.

	A	H	I	J	K
1	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)
15	14. Should sponsored refugees exit the scheme after a certain period?	there should be a limit, the same as there is a limit for HSS providers.			yes between 6-24 months. On needs basis
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?	HSS services should be available as a back up			<ul style="list-style-type: none"> * possibly contribution to a fund, as outlined above would act as safety net. * there would still be access to Medicare and other minimal benefits. * if sponsor could not provide, additional services can be provided by new sponsor or gov.
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?	ensuring that the sponsor is adequately prepared for the role they are committing to. They will need a suitable place to contact if they are having difficulties meeting their obligations or they need advice.			

	A	H	I	J	K
1	Questions	s. 47F(1)	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?	if there is a bond, sanction of not receiving some or all of the bond back, should only be used If the sponsor has wilfully neglected their duties, rather than been unable to fulfil them dies to circumstances beyond their control.			
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?	yes, or could be assisted by local HSS provider.			yes

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
2	1. Would a pilot of a private/community sponsorship program for refugees be feasible?	s. 47G(1)(a) after the founders had several years of working with Canada's PSR Program, welcoming and settling sponsored refugees. s. 47G(1)(a) and its affiliated network of nine refugee support groups across Australia have been sponsoring and settling refugees in this way s. 47G(1)(a), and this has been achieved without any Government funding. It is a very successful program, and has grown enormously, with huge future potential for expansion, and also has an excellent record of helping refugees into work in their new community, through local networks.	yes, but there are a number of risks. * accountability is a problem for church groups and African sponsors refugees - not clear idea on responsibilities of sponsoring refugee, provide incorrect information to refugees * will the refugees be able to get loans ? * not clear how sponsorship will reduce reliance on government support * goodwill in community can not be taken for granted - community groups need support * need to develop strategies to ensure that the refugees will learn English and get skills faster than under to current program.	yes, support principle. Small pilot, 5-10 sponsoring organisations	yes, as long as resources are allocated for planning, implementation and evaluation. High risk venture * would only be cost neutral if refugee's were not entitled to income support and settlement support.
3	2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?	It is important to engage business and corporations in supporting Australia's refugee program, bringing together community and corporate sectors in partnership. This can be of benefit both financially and in the wider area of work opportunity for new Australians.			

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
	3. Who should be able to sponsor refugees under a pilot?	<p>Ex-refugees now in Australia should always be able to sponsor direct family members, as it is vital that families be reunited, bringing much better settlement outcomes.</p> <p>It is very important that all other sponsors of refugees be part of a registered settlement group of five or more committed members. It is vital that training, and understanding of the refugee experience are given to those working directly with refugees. Helping new arrivals in all aspects of settlement and community integration is a very responsible undertaking, and no single person should be able to sponsor as an individual.</p>		<p>sponsors need financial resources and the ability/capacity to assist refugees to settle.</p> <p>* organisations - faith based, humanitarian, community groups.</p> <p>* important to note that some groups may have more resources than others. IE - Karen's community have said that they can provide airfares and medical checks, accommodation, household goods and jobs, whilst Tamils say that they can provide assistance with accommodation and basic needs but finding a job would difficult.</p> <p>* individuals/ families - would require an adequate safety net. - would need adequate financial resources - not feasible for individuals in process of settlement</p> <p>* employer/community group partnership - large employers could be potential sponsors. Government could provided incentive for employers to find work for refugees.</p>	<p>pilot could model as many potential models as possible.</p> <p>*individuals, community groups, and registered organisations</p>

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
	4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?	<p>* police checks</p> <p>It is vital that there is a central office to oversee this Program, to provide ongoing mentoring, advice and assistance to groups. The central office must be a community refugee organisation, directly linked to the relevant DIAC office.</p>		<p>* financial viability</p> <p>* demonstrated understanding of and experience in refugee settlement</p> <p>* demonstrate how they would be able to support refugee for 6 months</p> <p>* police checks/working with children</p> <p>* plan for accommodation</p> <p>* plan for settlement services to be provided by sponsor</p> <p>* plan for how sponsor will manage breakdown in relationship</p> <p>* show how they will link refugee to employment</p>	<p>* financial viability</p> <p>* sponsor has time to assist refugee</p> <p>* sponsor had nominated personal t assist refugee</p> <p>* sponsor is committed for the duration of the sponsorship period.</p>

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	2. Sponsorship of UNHCR registered refugees, who have spent many years in camps without hope, should be a priority, with a focus on women at risk and their children. In our experience, families and women with children settle well generally, compared to single men who are more mobile and less likely to stay in the community.		refugees must: * meet convention definition * undergo the same health/identity etc checks as other refugees * considered under offshore processes and criteria two main groups: 1. family reunion: split families be prioritised 2. individuals with high level of capacity to gain independence.	pilot: 202 - split family
7	6. What involvement should community organisations, s. 47G(1)(a) and the Australian Government have in identifying refugees for sponsorship?				selection should be based on eligibly criteria

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?			<ul style="list-style-type: none"> * HSS would be taken on by sponsors * eligibly for other government services limited * responsible for care, accommodation, settlement assistance and support for first 6 months * cost of pre-arrival medical checks, airfares/travel to Aus, reception on arrival * reception on arrival, accommodation, furnishings, financial support, mobile phone, settlement support, linking to government services - centrelink/Medicare, education, 	<p>responsibilities similar to those of HSS provides</p> <ul style="list-style-type: none"> * important to note that there must be a legal requirement to provide these services * discretionary AOS's have failed in the past * mechanism needs to be created to ensure support for new arrivals
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?			6-12 months	depends on refugee needs

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
10	9. Should a sponsored refugee be eligible for HSS services?			no	no - however this will result in a two tiered program.
11	10. What government services should the refugee be able to access once they are in Australia?			medicare, AMEP, JSA, schools and tafe, public transport concession * would not be eligible for centrelink on arrival - full supported by sponsor for six months, then if not working eligible for reduced centrelink for 18 months - after 2 years able to access all services	medicare public housing AMEP JSA SGP and CCS

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
12	11.How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?			robust monitoring and evaluation process. Monitoring agency can collect and analyse data on sponsors.	legal obligation for sponsors to provide assistance. * sponsors and refugees should be able to contact DIAC if they have any concerns

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?				monitoring application and approval processes need to be thorough
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?				could provide financial safety net - but would be prohibitive for individuals and many community organisations. Could be done under AOS

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
15	14. Should sponsored refugees exit the scheme after a certain period?			6- 12 months	
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?			<ul style="list-style-type: none"> * guarantor's for sponsors * CCS available for complex cases * SGP * HSS provider could be used to support refugee is sponsor fails * 	bond system
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?				clear program guidelines information sessions for sponsors training for sponsors amended version of AUSCO for sponsored refugees

	A	L	M	N	O
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)	
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?				
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?				yes

	A	P	Q	R	S	T
1	Questions	s. 47G(1)(a)				
2	1. Would a pilot of a private/community sponsorship program for refugees be feasible?	yes -but a number of challenges		yes	merit in proposal	endorse proposal - especially as it could help those waiting for family reunion. Keen for program to go ahead ASAP
3	2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?			there will always be costs - any increased number will mean increased costs		

	A	P	Q	R	S	T
1	Questions	s. 47G(1) (a)				
	3. Who should be able to sponsor refugees under a pilot?	<ul style="list-style-type: none">* family members seeking family reunion* volunteer and community groups* regional groups with employment needs		people with certain amount of money/assets so that they could be able to provide adequate support.	ethnic communities and volunteer groups some capacity for groups of individuals and families to sponsor. Preference for organisations outside capital city hot spots	

	A	P	Q	R	S	T
Questions	s. 47G(1)(a)					
1	4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?			police checks, reference checks, interview and training for suitability and explanation about expectations for their role as sponsors	financial viability	

	A	P	Q	R	S	T
1	Questions	s. 47G(1)(a)				
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	* women at risk, family reunion,		the most vulnerable - women, children, older people, those with least opportunity to come here otherwise	active areas of conflict should be taken in order to establish priorities s. 47G(1)(a) could be able to identify refugees without prospect of local integration split family - could include family member ineligible for SHP and extended family members dependant on relatives in Australia	
7	6. What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?			UNHCR should indentify them		

	A	P	Q	R	S	T
1	Questions	s. 47G(1) (a)				
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?	<ul style="list-style-type: none"> * social and some orientation support * cost of airfare - maybe additional support of loan * sponsors need to demonstrate that they have connections to settlement agencies * accommodation - not essential but not desirable * sponsors should not have to provide income support 		assistance with secure housing, linkage to English classes, health services, community support	<ul style="list-style-type: none"> * need to be clearly set out in program guidelines - could be modelled on current SHP or by those carried out by CRSS groups on past. - 	
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?			2 years - more intensive upfront and reduced over time. Should be clearly stated the types and the level of support provided at these different stages.		

	A	P	Q	R	S	T
1	Questions	S 47G(1) (a)				
10	9. Should a sponsored refugee be eligible for HSS services?			no		
11	10. What government services should the refugee be able to access once they are in Australia?	centrelink,		centrelink, medicare, full work rights, AMEP, HECS		

	A	P	Q	R	S	T
1	Questions	s. 47G(1)(a)				
12	11. How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?			an independent organisation should be established to do this	regular audits by case officer and regular reporting requirements on sponsors	

	A	P	Q	R	S	T
1	Questions	s. 47G(1)(a)				
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?			an independent organisation should be established to meet with both sponsor and sponsored person to verify the support claims	training and support	
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?			yes, have a bond that could be drawn upon to fund support to the person sponsored if the relationship breaks. - could be a minimum of \$5000	the specification of a bond could play an important role in ensuring that sponsors adequately provide for sponsored refugees.	

	A	P	Q	R	S	T
1	Questions	s. 47G(1)(a)				
15	14. Should sponsored refugees exit the scheme after a certain period?			yes, after 2 years		
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?	HSS knowing who to turn to if problems arise in relationship/services being delivered		bond, independent organisation monitoring/reviewing support provided	hotline for refugees to contact if they have concerns. HSS as a back up. No refugee should be disadvantaged by failures of a sponsor	
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?	training		provide information sessions and training to ensure that sponsors have realistic expectations about the resources they need. Mediation and consulting services	case officer/helpline	

	A	P	Q	R	S	T
1	Questions	s. 47G(1)(a)				
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?			loss of bond		
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?			yes, with transfer of responsibility		

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
2	1. Would a pilot of a private/community sponsorship program for refugees be feasible?	yes	yes, if there are realistic guidelines and eligibility requirements not feasible if general community do not adhere to scrutiny of eligibility requirements.		<p>*the proposed pilot program should take into account that the capacity of communities to support refugees varies greatly across Australia, particularly in regional areas</p> <p>*Initial consultation indicates that a number of RDA committees may be interested in canvassing the possibility of their regions participating in the refugee sponsorship program DIAC is proposing, however, further details on the proposed pilot are required. s. 47G(1)(a) would be able to engage further with the RDA network upon the public release of information.</p> <p>s. 47G(1)(a) considers that it would be advisable to consider the budgetary risks associated with increasing the number of refugees accepted into Australia based on the expectation that the refugees that take part in such a sponsorship program will necessarily require reduced financial and institutional support.</p> <p>s. 47G(1)(a) considers that the Government should continue to play a role in assisting the settlement of refugees irrespective of whether they are participating in a sponsorship program or not</p> <p>*it would need to be acknowledged that a certain set of characteristics are strong indicators of a refugee's likely successful resettlement with limited access to government support services. These characteristics which would include sound mental and physical health, strong English speaking skills, and skills and an employment history which would enable the maintenance of employment beyond their sponsorship period</p>
3	2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?	cost of community based detention must be weighed against current cost of mandatory detentions,			

	A	U	V	W	X
	Questions	s. 47G(1)(a)			
1					
	3. Who should be able to sponsor refugees under a pilot?	community groups, NGO's and church agencies who have current knowledge of the plight of refugees and some involvements in supporting them in detention centres or when they obtain visas.	<ul style="list-style-type: none">• Service Clubs e.g.: s. 47G(1)• Church groups – non fundamentalist• Corporate/Industry Sponsors – corporate giving arm• Philanthropic contributions to HSS to assist. (Private/Public sponsor mix) e.g.: s. 47G(1)(a)• Community Individuals/Families (including refugee family links) - Eligibility screening needs to ensure that the sponsor is credible, economically able and has the correct motivation to ensure optimal safe & positive settlement.		

	A	U	V	W	X
Questions		s. 47G(1)(a)			
1					
4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?		police checks, working with children checks	police checks, working with children, referees, financial background, signed contract to work with HSS/SGP, aus resident, interview process and comprehensive assessment,		

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	reuniting families could be high priority	<ul style="list-style-type: none"> * priority given to those in camps for more than 10 years * priority to refugees prepared to relocate to regional areas * people who already have family and friends in Aus 		
7	6. What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?	important for these groups to work together.	community organisations will be able to identify links in resettlement areas UNHCR can advise Gov UNHCR and Australian Government can increase visits to camps		

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?	formal contracts need to be drawn up. Organisation and payment for travel, assistance with initial accommodation and orientation to life in Australia.	* pre arrival support * airline ticket support with long term accomodation HSS initial refugee health check with ongoing assistance * support to access centrelink, employment and education		
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?	intensive support for 3 years	up to 12 months		

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
10	9. Should a sponsored refugee be eligible for HSS services?	yes	no		
11	10. What government services should the refugee be able to access once they are in Australia?	centrelink,medicare, AMEP, case management, support in finding accommodation and JSA	centrelink medicare, refugee health nurse, AMEP, government dental care, STTC schools, job networks, local government services, HSS/SGP		

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
12	11.How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?	third party or government monitoring	KPI's		

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?	contracts and agreements must be put in place. Clear obligations and expectations .			
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?	could ensure that sponsors adequate provide for the refugees and ensure that they meet obligations			

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
15	14. Should sponsored refugees exit the scheme after a certain period?	successful settlement can take yeas.			
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?				
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?	information and education resources, 24/7 hotline.			

	A	U	V	W	X
1	Questions	s. 47G(1)(a)			
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?	contract would provide legal obligations and sanctions. Hopefully problems can be identified before sanctions are needed.			
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?	yes			

	A	Y	Z	AA	AB	AC
Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)			
1	1. Would a pilot of a private/community sponsorship program for refugees be feasible?	yes. There is good will in the community for this program to be successful, especially amongst church groups. Would be helpful to look at Canada's model.	Yes, both feasible and very welcome. This is provided that the introduction of a new scheme does not involve a reduction (as opposed to a redistribution) of existing numbers and services for government sponsored refugees. PILOT THE SCHEME IN BOTH CAPITAL CITIES AND REGIONAL AREAS.	yes - only if it is to operate on a principle of 'addition' rather than 'replacement'. Several community groups have offered to make in kind financial contributions to support more refugees. * believe there would be a general desire within our organisation and, more broadly, the Anglican family in the Brisbane diocese, to support the expansion of the Humanitarian Program, to recognise in principle the value of a pilot program, and to explore ways in which we may potentially engage in a more tangible way in the future.	submission asks for DIAC to increase rohingya intake.	yes
2	2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?		Possibly a very simple scheme under which relatives/ NGOs in Australia could simply post a bond for each additional refugee given a visa to come to Australia.			
3						

	A	Y	Z	AA	AB	AC
Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)			
1						
3. Who should be able to sponsor refugees under a pilot?	believe there is merit in extending this sponsorship to include private and community sponsorship which would mean that Church groups and Community Groups could sponsor refugees	The Canadian scheme would appear to allow for a reasonable range of sponsors. In the Australia context there are very clearly two distinct categories to be considered (a) NGOs who wish to sponsor refugees to come to Australia and help them once arrived (b) relatives of refugees/ humanitarian entrants who are already here. As discussed further below, group (a) often support those most in need such as those who have spent many years living in refugee camps whilst group (b) almost by definition support less desperate refugees, since the relatives they are proposing already have relatives in a developed country (Australia) who can afford to send them funds (with the lowest wages in Australia being very splendid by most African or Asian standards). Widows and single mothers in camps have great needs but appear much less likely to be sponsored by relatives in Australia.				non gov or faith based organisations. Some groups may be limited by work that they are already doing to support refugees

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
5	4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?	<p>*All sponsors at a minimum should undergo nationally delivered training/induction so that they have a clear understanding of their roles and responsibilities when sponsoring refugees. This training and induction program should also include an initial assessment process and re-assessment process every twelve months.</p> <p>*If a Church group were to sign up to a "Sponsorship Agreement", we would recommend that someone within the Church be charged with the responsibility of ensuring that sponsors perform their sponsorship duties in a way that empowers and builds on the skills of refugees they sponsor.</p> <p>*A national register of sponsors should be developed by Government which would be used to track the number of sponsors and Sponsorship Agreements that are current and active and whether sponsors or community groups are "disqualified" from sponsoring. This system would also serve as part of the accreditation process where accredited sponsors would need to be registered in order to sponsor a refugee.</p>	Existing NGOs should have a recognised track-record. Small groups should have to demonstrate their bona fides and credit-worthiness. We could, for example, envisage the law or medical students association at a university collectively sponsoring one or two refugees who wanted to study law or medicine.	appropriate checks (such as police or Blue Card checks and interviews by a management/coordination group within the agreement holder/constituent group) would be built into the process of approving potential sponsors.		

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	<p>*Unaccompanied minors</p> <p>*Families</p> <p>* Women at risk (those who do not have the normal protection of a family unit and who find themselves in precarious situations where the local authorities cannot ensure their safety)</p>	<p>As suggested under question 3 there needs to be a double identification process (a) for the most needy (b) for the Australian relatives of refugees who want to bring them here.</p> <p>In considering refugees to be chosen to come to Australia there are two unfortunately competing criteria (1) need (2) ease of settlement once arrived. In this opposition, probably the most crucial factor is the education and English language ability of the adults involved (children & teenagers learn remarkably quickly). My personal view is that the best balance between the two would be to take any family from a refugee camp where one adult has a basic grasp of English</p>	<p>• as families or groupings of individual people ('Groups of Five' in Canada);</p> <p>• as community groups ('Community Sponsors' in Canada); and</p> <p>• as a constituent groups, with an overarching sponsorship agreement holder.</p> <p>• translation and interpreting services as required; and</p> <p>• full work rights including access to JSA and streaming as per any permanent resident.</p>		priority given to family reunion or previously refused hum applicants
7	6. What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?	<p>s. 22(1)(a)(ii) also makes the assumption that the UNHCR and the Australian Government already play a role together in identifying refugees for sponsorship</p>	<p>For category (a) UNHCR with input from the Australian Government, for category (b) their relatives. Some religious groups may wish to bring in co-religionists, does the Australian government wish to encourage this or not ?</p>	<p>Sponsors should have the option of being involved in the identification/nomination of refugees for their sponsorship program priority being placed upon family, community and cultural reunification and/or connection. We suggest that this priority should apply equally if there were to be a government/UNHCR based nomination process running in parallel to the above.</p> <p>For a government/UNHCR-based nomination process it must be understood that ultimately sponsors will be volunteers not paid professionals. They must therefore be given opportunity to consider and possibly decline taking on a particular person(s) as sponsored refugees if they have concerns about their capability to appropriately support the nominee(s) due to language, culture, religious or other factors.</p>		

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?	<p>*Providing or contributing to the cost of clothing, furniture and other household goods</p> <p>*Locating interpreters</p> <p>*Locating a family friendly doctor, dentist and pharmacist</p> <p>*Assisting the family to apply for health care coverage</p> <p>*Assisting the family to enrol their child/ren into a local school and adults into English language / adult learning classes</p> <p>*Assisting individuals and families to find employment and longer term housing</p> <p>*Introducing the family to members of the local community, church groups, personal interest groups,</p> <p>*Providing the family with an introduction and orientation with regard to budgeting, banking, transportation, local grocery shops etc..</p>	no specific comments on the remaining questions.	<p>• education, including the Adult Migrant English Program;</p> <p>• health services, including refugee health services, health care card while applicable, Medicare Card, public dental services, torture and trauma counselling services;</p>		Where an organisation has the capacity, sponsors should be required to provide financial contributions, human/volunteer resources and social support. Responsibilities should also include monitoring and reporting of their own business and the success of participants.
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?	3-12 months. Sponsors will require accreditation for 12 month period		To this end, the program needs an exit point, either a timed exit or a phased transition as milestones are reached. This would be made clear to sponsored families at the beginning of the program, while acknowledging that relationships of support and friendship are often likely to continue informally.		There should e indicative timeframes for services and supports with consideration that some participants may require more or less supports.

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
10	9. Should a sponsored refugee be eligible for HSS services?			Sponsors cannot be expected to have expert knowledge or to provide more than orientation and social support where more complex needs exist. We suggest that the sponsorship program could link to existing HSS programs so that complex cases could still have a case manager. It would be important that partnership and referral processes are also in place so that if a family or an individual becomes 'complex' (eg for health, financial, emotional/ mental health issues), the management of those issues could be referred to HSS, albeit with continued support from sponsor group		The services available should also include the Humanitarian Settlement Services (HSS) that all other visa applicants are eligible to access.
11	10. What government services should the refugee be able to access once they are in Australia?	refugees should be able to access the full array of government and non government services that any Australian citizen would once they are in Australia. There should be no distinction or variance in this regard.				All government services and supports should be available to program participants. However, responsibility should be defined and shared across the sponsoring agency and the Department. The project should be focussed on settling the participants and getting them engaged and functioning in their local community as soon as possible.

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
12	11. How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?	sponsors should (as part of their sponsoring commitment) complete a minimum of 2 training sessions per year. This training should be a combination of face to face and e-learning modules. We also believe that part of "signing up" should also involve a yearly review of their sponsorship as identified in previous sections of this paper.				Sponsors should be required to complete an audit and report to either the Government or an independent 3rd party which should be supported by a broader agreement or contract with clear stipulation of roles and responsibilities.

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?	If sponsors were required to participate in this training, assessment and review process, would give the Government confidence that there is regular monitoring and review of all sponsors wishing to sponsor a refugee. regular feedback from refugees themselves would also serve as another measure / mechanism of monitoring community and private sponsorships.		A key consideration of the pilot scheme needs to be that sponsors are sufficiently supported in their roles that their experience is rewarding and successful for all parties. Indeed it is a significant risk for the long term success of the scheme if this aspect is insufficiently addressed in its design. Effective support for sponsors will maximise investment and 'returns' (for both government and sponsors), in a financial, social and/or emotional sense.		
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?	not entirely convinced that the payment of a bond would be effective in ensuring that sponsors adequately provide for sponsored refugees. We believe that mechanisms such as the training, e-learning modules, assessment and reassessment processes would provide us with information about whether sponsored refugees are being adequately supported.		we consider that a bond would be a significant disincentive to potential sponsors and likely to be a barrier to the success of the program.		A bond would provide assurance and ensure committed to the project and to fulfil their obligations as a sponsor however this should only be one element of the measures of assurance.

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
15	14. Should sponsored refugees exit the scheme after a certain period?					There should be an indicative timeframe for program however should be assessed on a case by case basis to ensure engagement and greater community outcomes.
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?	s. 22(1)(a)(ii) believes that there are services within the Australian community that could serve as a "safety net" for refugees sponsored under this pilot. There are specific programs in communities that aim to work with refugees and there are other mainstream services that refugees can be linked into for support		support a safety net to support both refugees and sponsors in those rare instances where something goes wrong or unsuitable sponsors fail in their duties towards the refugee's).		Resources, key contact people in relevant Departments, a network and links with other agencies should provide a 'safety net' for the sponsors. It could also assist with fostering commitment from other stakeholders to work in true and meaningful partnership for the settlement of new arrivals.
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?	believe that a tailored training, assessment and review package would ensure that sponsors are accountable for their obligations.				Ensuring a commitment to communication throughout the partnership, provision of insurance/s, risk assessments and/or tracking and reporting mechanisms to ensure that there is safe guards for those that are coming to Australia as part of the program

	A	Y	Z	AA	AB	AC
1	Questions	s. 47G(1)(a)	s. 47F(1)	s. 47G(1)(a)		
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?	the sponsor is provided with support to ensure compliance but ultimately could be "disqualified" from providing sponsorship if all attempts to support the sponsor failed. This would essentially result in the sponsor being de-registered to provide sponsorship of refugees.				There should be sanctions if sponsors fail to meet their responsibilities – this may vary on the sponsor's capacity but could include a financial bond arrangement or compensation scheme but again, it should consider the relationships between the government, sponsor, the participant and overall outcomes rather than appointing of accountability, not withstanding roles and responsibilities would need to be clearly defined.
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?	not recommend that this change is made without consideration of what is happening and circumstances leading to this request. We believe that refugees themselves should not make the decision to move or change sponsors without this going through an assessment process. The assessment process and decision to change sponsors should be made by an assessor of some kind.				

	A	AD	AE	AF	AG	AH	AI
Questions		s. 47G(1)(a)	s. 47G(1)(a)				
1							
1. Would a pilot of a private/community sponsorship program for refugees be feasible?		feasible and desirable	feasible and warranted in the context of the enormous unmet need for more resettlement places worldwide Representatives from refugee (ethnic) community organisations consulted for this submission and through s. 47G(1)(a) annual community consultations have overwhelmingly articulated their support for greater community involvement in refugee resettlement. there are untapped community resources that could be drawn on in developing a viable and cost-effective pilot. This is also apparent in the overwhelming response of the broader Australian community to the recent Community Placement Network initiative of the Australian Homestay Network for people to provide short-term homestay accommodation to asylum seekers released into the community on bridging visas	strongly support			
2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?		The Australian government is urged to consider the extremely high costs, both in human and financial terms, of mandatory detention. Abolition of mandatory detention or the reduction of time spent by refugees in mandatory detention would, in itself, significantly reduce the costs involved in the Humanitarian program and thus enable more people to be resettled in Australia at no extra cost to the Australian government or people.	alternative and additional pathways for refugee and humanitarian entrants to propose and reunite with family members under the general Migration Program who would otherwise be eligible under the SHP. While family reunion should be a cornerstone of Refugee and Humanitarian Program, some families may have greater capacity to seek alternative means of reuniting other than the SHP.				

	A	AD	AE	AF	AG	AH	AI
Questions		s. 47G(1)(a)					
1							
3. Who should be able to sponsor refugees under a pilot?		the present IAAAS program could be adapted or adjusted to cater for sponsorship of refugees by private individuals, either individually or in groups, and community organisations which are registered with DIAC and subjected to regular supervision and oversight.	<ul style="list-style-type: none"> Humanitarian and faith-based community organisations – these organisations may not have been set up for the purposes of supporting refugees but 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. Volunteer-based community organisations with a proven record in supporting refugee and humanitarian entrants to settle in Australia – for example, the s. 47G(1)(a) groups; Ethnic community organisations – established by former refugees and with connections to refugee communities in Australia and overseas <p>A sponsorship model should allow for partnerships between different organisations or groups, allowing smaller or less resourced groups to partner with larger organisations</p>	<p>During discussion participant unanimously agreed that the following parties/bodies should be able to sponsor a refugee:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Immediate family members, <input type="checkbox"/> Relatives and friends, <input type="checkbox"/> religious organisations, <input type="checkbox"/> community groups and <input type="checkbox"/> Potential business owners who might need workers with specific skills. 			

	A	AD	AE	AF	AG	AH	AI
Questions		s. 47G(1)(a)					
1							
4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?		financial resources, capacity to cater for the emotional and physical welfare and well-being of the sponsored refugees, and meet "character requirements" such as having no criminal record. Prospective sponsors and employees of organisations sponsoring refugees who will be working with those refugees should be required to obtain a Police clearance certificate and, in cases where children are involved, also hold a valid working with children certificate and be registered and supervised by the local State Department of Child Protection.	s. 47G(1) suggests that a clearly articulated set of requirements be incorporated in the EOI to ensure minimum standards for sponsoring groups.	Credibility of the person, community groups and religious institutions must be established. Some of the participants suggested that a private sponsor must provide letter of support from the community. However, some participants have a view that this may create friction between sponsor and community leaders in the event of rejection to provide letter of support.			

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	Potential applicants should be identified for sponsorship and prioritised for visa processing by an independent agency such as the UNHCR. The Australian government should only consider refusing a visa in clearly defined circumstances relating to the character of the proposed refugee or if the proposed refugee is found to be a risk to the national security of Australia. Any refusal of a visa on character or security grounds should be open to challenge before an Australian Court of Law.	a. Applicants with immediate family members in Australia already identified through the SHP and awaiting a visa grant b. Applicants with community links in Australia who have limited or no access to alternative resettlement processes	The potential applicants should be refugees who are registered with UNHCR, refugees who stayed longer in a camp or outside a camp in a risky condition and family reunion need to be prioritized			
7	6. What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?	Community organisations and the Australian government should have a procedure available to them to approach the UNHCR to request prioritised assessment of any refugee identified by the organisation or the government as being suitable for sponsorship in Australia.		<p>UNHCR: Ensure refugee with their basic human rights, protection and with a statement on their current conditions.</p> <p>Australian Government: Support refugee and sponsors when extra help is required and monitoring the process of sponsorship.</p> <p>Community organisation: Provide assistance to the sponsor necessary, for example organizing a loan to pay airfare if the sponsor has financial need and contributing to the mentoring of sponsorship. In exceptional cases, provide assistant to the refugee when the sponsor or the community is proven to be unable to fulfil the tasks and financial commitments of sponsoring.</p>			

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?	Sponsors should have the responsibility for the day to day care, welfare and well-being of the sponsored refugee and should sign a written undertaking in this regard in respect of each sponsored refugee. The care, welfare and well-being of sponsored refugees should include, but not be limited to, providing accommodation, food and clothing, assisting with the integration of the sponsored refugee into the local community and the wider Australian society, ensuring that the health of the sponsored refugee is adequately catered for with visits to Doctors, Dentists and any medical facilities as and when required, ensuring that the sponsored refugee attends any educational institution or training facility as entitled or required by law, ensuring that the sponsored refugee has access to any religious place of worship as required by the sponsored refugee and to do all things reasonably necessary to ensure the physical, mental and spiritual health of the sponsored refugee.	<ul style="list-style-type: none"> * administration and liaison - identification of applicants, liaison with DIAC * airfares * case management - in collaborations with HSS * transit assistance * reception, property induction and initial food provision * essential registrations - centrelink, Medicare, schooling etc * orientation to link with HSS provider's * health services - ensuring referrals are made to health services. * short term accommodations, support in securing long term accommodation * basic household goods package * employment assistance 	The following tasks should be the sponsor's duties after arrival: <ul style="list-style-type: none"> <input type="checkbox"/> area orientation <input type="checkbox"/> take the refugee to public services among others Centrelink, Medicare office, language school, general practitioner, hospital, Queensland transport to get license and bank (show how to use ATM). <input type="checkbox"/> explain and show the person important places like Moorooka shopping centre by public transport and importance of multicultural democratic systems <input type="checkbox"/> link the person to employment agency <input type="checkbox"/> assist in finding accommodation <input type="checkbox"/> link the person to employment agency <input type="checkbox"/> Relevant laws e.g. domestic protection, road safety, etc. 			
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?	The level of support required to be given by sponsors should be clearly defined and any failure to give the designated support should lead to the cancellation of the sponsorship by the sponsor and, in appropriate circumstances be subject to civil or criminal sanction. The length of time of any sponsorship should also be clearly defined and should be variable depending on the individual circumstances of the sponsor and the sponsored refugee and should be capable of variation should the circumstances of either the sponsor or the sponsored refugee change.	s. 47G(1) considers that a minimum of 12 months of support by a sponsor group would provide a commensurate amount of time for on-arrival settlement support to that provided through the HSS	Yes, the level of support and length of time should be defined by at least six months.			

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
10	9. Should a sponsored refugee be eligible for HSS services?	It is submitted that it would be unreasonable to expect sponsors to meet the full cost of the sponsored refugees expenses and that this might lead to the sponsorship program only being available to wealthy individuals and organisations. It is suggested that to avoid any "elitist" character to the program developing that sponsors be assisted by granting the sponsored refugee 50% of the current entitlements of persons under the HSS program.	s. 47G(1) believes that settlement standards must be commensurate under privately-sponsored and Government-funded streams, considering that a sponsored refugee also has gone through the same experience as those who come to Australia on other humanitarian visa categories, and they should be eligible for services equivalent to those provided under the Humanitarian Settlement Services (HSS) program. Sponsor groups could or should have the capacity to provide a large proportion of the services provided by HSS contractors and would not require HSS services, but that sponsor groups could potentially link in with local HSS services to ascertain where services could be provided with minimal cost impact for providers, for example, expanding access to orientation for some sponsored refugees or including sponsor group volunteers in HSS volunteer induction and training	No, the sponsor should take responsibility to the settlement of the refugee who they sponsored. The sponsor is expected to assist the refugee with looking for accommodation if possible or link to organisation who can assist etc. as per Question 7, above.			
11	10. What government services should the refugee be able to access once they are in Australia?	The services as set out in 9 above.	*Centrelink – although some expectation of greater support and success in transitioning to financial self-sufficiency should be incorporated in a private/community sponsorship model, this should not exclude or limit eligibility to Centrelink as a basic safety net and entitlement of any permanent resident; * Medicare – same access as any other permanent resident; *AMEP – entitlement to 510 hours as per other humanitarian entrants; Torture and trauma services – referral as required; *Translating and Interpreting Service (TIS) – the need to access TIS may be reduced, particularly when the sponsor group is partnered with or is an ethnic community organisation, but sponsored refugees should not be excluded from eligibility to TIS, particularly when communicating with essential services; *Any other government services that other permanent residents are eligible to access – this includes education, employment and health services; *Complex Case Support (CCS) – although the selection of potential applicants should where possible consider complex cases as more appropriately referred for support by funded HSS providers, it should be recognised that complexities and vulnerabilities of sponsored refugees may emerge after settlement that are beyond the capacity of a sponsor group to address. In these cases, referral for CCS may be required and eligibility should be open to sponsored refugees to access CCS. This would also provide a safety net (Q.15) for those sponsored under such a program and for the sponsor groups; SGP – potential for referral to SGP services after 12 months.	The sponsored refugees should be able to access the following government services: <input type="checkbox"/> Centrelink <input type="checkbox"/> Translation and interpreting Services (TIS) <input type="checkbox"/> Child care rebate or child care assistant while studying English <input type="checkbox"/> Job search assistant <input type="checkbox"/> Further education <input type="checkbox"/> Medicare <input type="checkbox"/> English lessons			

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
12	11. How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?	The independent Reviewing Authority should also act as an arbitrator to deal with complaints and any sponsor found to be guilty of failure to give the designated support to a sponsored refugee should be struck off the register of sponsors and prohibited from future sponsorships. Sponsors should be monitored, in the first instance, by Case Managers appointed to the sponsored refugee by the DIAC. An independent monitoring body should be established to provide an independent and objective overview of the program.		The settlement process could be monitored by interviewing the refugees, with sponsors, or doing a regular follow up to see how they are doing. The government could also provide a Check list or Terms of Reference to be approved and used by the sponsor and government. The sponsor should explain to the refugee's Australian way of life and values, also some common cultural differences need to be made clear to avoid cultural clashes, misunderstanding and misinterpretation. The refugees could be provided with information concerning his/her rights and be required to report to government or third party if sponsors are not fulfilling their stated and agreed obligations. The organisations stated below, who will jointly be responsible for their obligations to the refugee should be included in the process of monitoring which will ensure verification of the sponsorship functioning well.			

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?	<p>It is submitted that the most appropriate way for the government to ensure that sponsors comply with their sponsorship obligations is to ensure that the sponsorship program is a statutory-based program with legally enforceable rights for the sponsored refugee and legally enforceable obligations for the sponsor. In addition to this, government should ensure that an independent review process is established and that both sponsors and sponsored refugees should have a clear procedure to follow to report any problems/issues which arise during the course of the sponsorship agreement. The independent review body should be separate from and independent of DIAC and, as far as practical, independent of government.</p>		<p>A Sponsorship Agreement should be contracted to OR Terms of Reference so that all parties have jointly agreed to fulfil specific obligations. The Sponsorship Agreement will be used as the basis of monitoring and will refer to as a guide to a fully functioning sponsorship program. Feedback from community and the refugees could be obtained to find out whether the sponsorship comply their obligation or not.</p>			
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?	<p>The payment of a bond would be inappropriate and add an unnecessary burden or obstacle to the process. Imposition of a bond may lead to exploitation of the sponsored refugee as has happened with the Assurance of Support bond in the family visa program where persons enter into an AOS bond at exorbitant rates to the prejudice of the visa applicants.</p>	<p>bond would not be an appropriate sanction or means of encouraging sponsor accountability, particularly when considering that many potential sponsor groups would be volunteer-based organisations with limited resources and which draw more heavily on in-kind resources and fundraising ability.</p>	<p>The bond might play a vital role in complying the Sponsorship Agreement and obligations expected from the sponsor. However, the bond should be reasonable cost as the sponsor may incur many other expenses at the same time such as medical and air tickets.</p>			

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
15	14. Should sponsored refugees exit the scheme after a certain period?			Yes the refugee should exit the programme after a set period of time.			
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?	<p>a. Regular review of the program by an independent monitoring body which has the power to act positively to assist any sponsored refugee who is being adversely affected by the circumstances of their situation.</p> <p>b. Each sponsored refugee should have a dedicated Case Worker assigned to them to assist both the sponsored refugee with any issues beyond the control of the sponsor and to assist the sponsor to meet all their obligations under the sponsorship agreement.</p>		<p>We the community, think it will be good if there is some kind of "safety net" to minimise the possible problems. These options could be mentioned as "safety net"</p> <p><input type="checkbox"/> Paying bond to ensure compliance with obligations</p> <p><input type="checkbox"/> Affidavit or status declaration to support legal responsibility</p> <p><input type="checkbox"/> Public liability insurance</p>			
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?	The government could implement the measures set out in paragraphs 9, 10, 11 and 15 above.	support structure would need to be established to act as a central coordinating body. This role could potentially be fulfilled by establishing a structure within DIAC, which would probably be more feasible in the context of a small pilot program, or by contracting this out to a national organisation in the case of an expanded program.				

	A	AD	AE	AF	AG	AH	AI
1	Questions	s. 47G(1)(a)					
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?	It is submitted that sanctions should apply if sponsors fail to meet their responsibilities. Sanctions should vary, depending on the severity of the breach of the sponsorship obligations and could range from a verbal warning through to a written warning and an order to remedy the breach to, in the most severe cases, either civil or criminal law sanction if the breach amounts to breaking an Australian law.	Where groups fail to meet sponsorship requirements, an appropriate sanction may be to disallow future sponsorship applications or to impose specific conditions which ensure future compliance.	Yes, there should be a sanction if the sponsor fails to meet his/her obligations. Such a failure should have consequences for future sponsorship and further assistance by the community. When failure occurs the community will take over the task.			
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?	A sponsored refugee should be allowed to change sponsors if their initial sponsor fails to meet their sponsorship responsibilities, especially if the failure is through no fault of the sponsored refugee.	s. 47G(1) believes that the role of monitoring and evaluation of a pilot private/community sponsorship program should be undertaken by an independent body with input from a panel of experts – including DIAC, settlement services and peak bodies. The timeframe for monitoring and evaluation should be at least two years to ensure the evaluation incorporates an assessment of employment outcomes as well as the provision of basic settlement supports.	Yes, a sponsored refugee should be free to change his/her sponsor if the initial sponsor is proven to be not meeting their agreed obligations. This has to be verified using the sponsorship agreement and the monitoring process which involves all relevant parties			

	A	AJ	AK	AL	AM	AN
Questions	s. 47G(1)(a)					
1						
1. Would a pilot of a private/community sponsorship program for refugees be feasible?	yes	yes	yes	yes	yes	supportive, as long as it would provide additional places over and above the 13750. * s. 47G(1)(a) recommends that the Canadian Private Sponsorship of Refugees Program be used as a model for the pilot Australian program. However, we recommend additional safety net features be incorporated, particularly around access to appropriate services, for instance for victims torture and trauma. The need for ongoing training of sponsoring groups should also be a priority and the program itself should not be too complicated, legalistic or inaccessible * Whilst canadian model should be used, processing times need to be improved. canadian model takes up to three years to process refugee under the PSR program * Consideration will need to be given as to whether or not the private sponsorship pilot will include both family reunion as well as broader protection cases and if so how with this be balanced to ensure that the private sponsorship program does not become another de facto family reunion program.
2						
2. Are there any alternative or additional measures that the Government could consider in order to increase Australia's Humanitarian Program without a significant budgetary impact?						
3						

	A	AJ	AK	AL	AM	AN
Questions		s. 47G(1)(a)				
1						
3. Who should be able to sponsor refugees under a pilot?		*individual families/relatives who have financial capacity * community organisations	1. community organisations 2. incorporated organisations 3. private citizens	Permanent residents with 2 or more year's residence or Australian Citizens who have resided in Australia for the past year and can commit to residing in the same area with the humanitarian entrant for at least 2 years after arrival. Such persons would need to be thoroughly vetted to ensure the reasons for sponsorship were legitimate and humanitarian.	individuals, religious groups, ethno specific groups and other community not for profit organisations should be able to sponsor	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
	4. What type of vetting or checking should be required for sponsors wishing to sponsor a refugee under a pilot?	must have following resources: * organisational capacity * financial * human resources	As such based on this best practice framework we would recommend the following vetting and checking processes. 1. Information session to all potential sponsor applicants; 2. Application process - potential sponsor fills out an application form with all details of why they would like to sponsor a refugee , proposed settlement and financial plan; 3. Face-to-face interview- if potential sponsor passes the application process they attend a face to face interview with DIAC or subcontracted third party; 4. Reference checks are conducted (both professional and personal); 5. National police check and Working for children check (if sponsoring family groups or unaccompanied minors) are undertaken. If it is an organisation applying, then volunteers/staff unaccompanied minors) are undertaken. If it is an organisation applying, then volunteers/staff should have these checks. 6. Financial checks to demonstrate they are able to support their clients/s for a period of one year; 7. House inspections 8. Risk Management- personality tests are done (if individuals are sponsoring refugee/s). 9. Sign an agreement with the Australian Government to provide funds and carry out stipulated duties in the agreement.	A clear Police check or working with children's check would be one of the first credentials initially required. There should be no criminal history relating to each individual. Personal references should be provided with clear police check/working with children check for each referee.	For individuals, we believe that the checks should be the same as those required for any individual sponsoring someone to migrate to Australia under any visa f category. For organisations, it would be necessary to be registered with a state or federal government agency such as the NSW Office of Fair Trading, with objectives that support their participation in the pilot program. The organization should have served the community for not less than 10 years.	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
6	5. How should potential applicants be identified for sponsorship and prioritised for visa processing under the pilot?	s. 47G(1) recommends that all potential applicants be persons identified and/or defined by the United Nations High Commissioner for Refugees' (UNHCR) as refugees. In addition they must be recognised by Australian law as refugees or in a refugee-like situation to be eligible for the program. In particular, preference should be provided to those who are considered vulnerable in the following categories; <ul style="list-style-type: none"> • Refugees at risk in the camps. • women, children, political activists/journalists-to add to what the government has listed as eligible • Refugees with relatives in Australia 	* meet refugee status * personal criteria: low risk clients, points based system eg English, educations, work skills, 50 yrs or younger, be able to pass health and security, priority given to UAMs * client is referred to DIAC thru UNHCR or client can apply directly to DIAC	Potential applicants could be identified via family members / UNHCR list of eligible individuals with family members who have already gained Humanitarian visas.	Individuals and organisations may become aware of potential applicants through a variety of means. For example, in the case of our organisation, we are often made aware of potential humanitarian entrants through their relationship with relative and friends who are already residing in Australia. However, potential applicants will need to meet the UNHCR guidelines for applying to become a humanitarian entrant. Perhaps under the pilot program, the Department of Immigration can design categories such as for existing humanitarian migrants, to differentiate applicants according to their situation or sponsorship commitment, and to give priorities to refugees in a more dire situation.	
7	6. What involvement should community organisations, UNHCR and the Australian Government have in identifying refugees for sponsorship?	The Council opines that community organisations, UNHCR and the Australian Government should have a joint role in identifying refugees for sponsorship. There should be a consultative mechanism/forum which brings together all those key stakeholders where all the sensitive/complex cases are discussed and policies are discussed before making decisions to ensure transparency and accountability.	DIAC match client with sponsoring organisation or individuals. UNHCR to refer people to program that have been given refugee status if they meet the criteria. Community organisations can nominate to sponsor certain individuals, however, they need to apply and be accepted via DIAC.		UNHCR should continue to have primary responsibility for identifying refugees for sponsorship. They have well-established criteria for assessing individual's eligibility and operate over such a wide geographical area to permit them to access to a large number of refugee groups.	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
8	7. What responsibilities should sponsors have and what undertakings should they be required to give?	<ul style="list-style-type: none"> * payment of bond * facilitate relocation * support settlement/housing * foster integration * assist refugees access mainstream services 	sponsor would replace HSS provider	Sponsors should have full financial and settlement responsibility for applicants. They would need to show ability to cover the cost to travel, initial set up of the family / individual, medical costs etc and have a thorough knowledge of the settling area as well as the organisations and services they provide within the community.	Individual sponsors should be means tested before they can become a sponsor so that the risk of their obligation being defaulted on is minimized.	
9	8. Should the level of support by sponsors, and length of time it should continue, be defined?	yes with a possibility for periodic reviews		The length of time for sponsorship to continue should be at least a commitment of 2 years. This would ensure that the new arrival has been linked in to numerous relevant community services. This may mean a "checklist" for the sponsoring family/families/organisation.	Sponsors should be responsible for the initial travel costs if possible with grants from the government, and living costs of the arrivals for up to one year if there were to be a 6-month exclusion period for them to access Centrelink payments	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
10	9. Should a sponsored refugee be eligible for HSS services?	yes in collaboration with settlement agencies		Sponsored refugees should be eligible for limited HSS / SGP support. However the sponsor should be responsible for much of the initial settlement.	They should be eligible for some HSS services. This should be assessed on individual basis.	
11	10. What government services should the refugee be able to access once they are in Australia?	*education * medical * English language classes * job search		Sponsored refugees should be eligible for all government services provided to permanent residents once arriving in the country.	The refugees should be able to access English learning services, Medicare, employment and training services once they arrive.	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
12	11. How should sponsors be monitored by Government or a third party to ensure their responsibilities to the sponsored refugee are being met?	s. 47G(1) recommends the appointment of an independent entity devoid of Government control. This should be a Commission established by act of parliament		Monitoring by Government or a third party to ensure responsibilities are fulfilled is integral to the success of the program. Humanitarian entrants are often very vulnerable and easily taken advantage of. Suggestions for monitoring would be a monthly report by sponsor back to DIAC (possibility for referral of difficult issues to HSS / SGP) and an incremental interview with interpreter provided to Humanitarian entrants without their sponsor present could be possibilities.	Channels of communication would need to be established with both the sponsor and the sponsored refugee for a third party to monitor that responsibilities are being met. It is important that both parties are spoken with to check for any inconsistencies. Sponsors would require an interview to determine their eligibility at which their responsibilities would be made clear.	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
13	12. What is the most appropriate way for the Government to ensure that sponsors comply with their sponsorship obligations?	Requirement that sponsors provide progress reports to government Regular audit by the Commission.		DIAC could provide a training day for sponsors to alert them to all the issues and stages of settlement. This forum could include a settlement pack with settlement goals to guide sponsors. Checklists and dedicated visits etc to each of the families and applicants to ensure things are going well.	It would be a good idea to require sponsors to pay a minimal bond that is returned to them at the end of a two-year period. The bond could ensure that the government has some funds to support the sponsored refugee in cases where the sponsor does not meet there obligations	
14	13. What role could the payment of a bond play in ensuring that sponsors adequately provide for sponsored refugees?	s. 47G(1)(a) view is that there should be legal and financial penalties (including forfeiture of Bond) in the event of breach of sponsors' obligations.		The payment of a bond may deter potential exploitation of applicants. Return of the bond may be at the end of the 2 year period or release incrementally during the 2 year period subject to milestones achieved.	In such a case, the bond can be taken used to make a special payment to the sponsored refugee. If a sponsor fails to meet their sponsorship commitment, refugees would have to lodge an application to Centrelink as a record and claim special payment that would come out of the bond.	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 22(1)(a)(ii)				
15	14. Should sponsored refugees exit the scheme after a certain period?	Yes. There should be a time when sponsored refugees should exit the program. This will give room for other needy cases. s. 47G(1)(a) supports an elaborate mechanism for exit to take effect. That there must be criteria for example the sponsored refugees having been fully resettled, integrated and engaged in gainful employment.		Refugees could exit the sponsored system after two years and be eligible for reduced SGP support for the coming three years	At the end of a two-year period the sponsor should be relinquished of their responsibilities to the sponsored refugee. From our experience that is a sufficient amount of time for the typical sponsored refugee to have transitioned into life in Australia and to be confident in functioning independently.	
16	15. What, if any, 'safety net' features should be included in a private/community sponsorship model?	s. 47G(1) is the view that sponsors of refugees must meet among other the following: key requirements; *Knowledge of key services *Public liability insurance *Ability to channel issues to relevant Government agencies at Federal, State and Local level. * Evidence of funds to support eligible sponsors refugees for at least 6 Months in Australia		There needs to be a "safety net" incorporated to prevent any issues of exploitation. As indicated previously this may have regard to the payment of a bond which is returned after the 2 year period or incrementally throughout this period.	Prior to the end of the two-year period, sponsored refugees should be assessed for the suitability to exit the scheme. If it is deemed that they require extra support the assessing party has the time to make referrals to relevant services.	
17	16. What measures could the Government implement to help sponsors meet their sponsorship commitments?	Ongoing monitoring by the Independent body or the Commission.		As indicated previously, a training day to ensure all Government expectations and information is clearly understood. Also "checklists" which include reportable milestones which would be discussed during face to face interviews with the family/families/organisations.	The return of the bond after a two-year period would be a good incentive to help sponsors meet their obligations. It would be important not to make the responsibilities of the sponsor so onerous that it becomes unachievable in light of their existing commitments.	

	A	AJ	AK	AL	AM	AN
1	Questions	s. 47G(1)(a)				
18	17. Should there be any sanctions if sponsors fail to meet their responsibilities?	s. 47G(1) opines that the sanctions should be prescribed in the letter of commitment by the Government to sponsors.		As indicated previously, this could relate back to the bond and its repayment	In cases where sponsors fail to meet their responsibilities they will not have their bond returned.	
19	18. Should a sponsored refugee be able to change sponsors, if their initial sponsor fails to meet their responsibilities?	s. 47G(1) response is in the affirmative. However this must only occur in exceptional circumstances. For purposes of natural justice the action should be based on the recommendations of the independent body / Commission to be established.		A sponsored refugee should be able to change sponsors only in extenuating circumstances. The next sponsor must agree to the terms originally signed off on.	If it is within the two-year period and another sponsor is available then we do not see any problem with a sponsored refugee being able to change sponsors. The only potential problem could be in finding another sponsor. It could be that the Department of Immigration has a list of interested sponsors who may not know of someone eligible to become a sponsored refugee but would still like to participate in the program.	


Summary of key issues raised in community submissions

61 responses were received in response to the discussion paper. Submissions were received from key humanitarian organisations, community organisations, faith-based groups and State, Territory and Local Governments.

Issues for consideration	Responses
Would a pilot of a private/community sponsorship program for refugees be feasible?	The submissions are broadly supportive of the private/community sponsorship program. The submissions outline that the pilot would be both feasible and welcome in Australia. However many submissions highlight that there are a number of challenges that need to be addressed in order for this pilot to be successfully implemented in an Australian context. s. 47G(1)(a) and a number of smaller refugee support groups expressed concern that the pilot may create a 'second class' of refugees. 1)(a) and s. 47G(1)(a) emphasised that the pilot would only be feasible if significant resources are allocated for in-depth planning, implementation and evaluation. These concerns have also been voiced by a number of Commonwealth Government agencies including FAHCSIA and DEEWR.
Who should be able to sponsor refugees under a pilot?	The submissions identified a number of groups that could sponsor refugees under the pilot. <ul style="list-style-type: none"> Community organisations and groups: The majority of submissions support the idea that community groups and organisations be able to sponsor refugees. There is a clear consensus that any such group would be experienced with settling and supporting refugees. Individuals: responses are mixed on whether individuals should be able to sponsor refugees. s. 47G(1)(a) 1)(a) and s. 47G(1)(a) both expressed the view that resettled refugees should be able to sponsor family members to come to Australia under this pilot. This view is supported by a number of ethnic and cultural groups. However other submissions outline those individuals may not be able to adequately provide the financial or settlement services required by refugees.
Identifying refugees for sponsorship	The majority of submissions outline that refugees selected for the pilot should be mandated by the UNHCR and meet the criteria already established under the Offshore Humanitarian program. A significant number of submissions call on the government to use this pilot as a means of addressing the limited places available for 'split family' applications. Many submissions see the pilot as a way to facilitate family reunion. Other submissions suggest that refugees should be selected based on skills, English proficiency and ability to successfully settle.
Responsibilities of sponsors	The large majority of submissions are of the view that sponsors will provide support similar to that currently provided by HSS providers. The general consensus is that sponsors will be responsible for providing airfares, initial accommodation, orientation support, household goods, and in some cases assistance in finding employment. Whilst some submissions outline that the sponsor should provide financial support, there is no suggestion that this will be provided in lieu of Government income support. s. 22(1)(a) 1)(a) and a number of ethnic community organisations suggest that they will require the refugee to pay back money for airfares and initial rent once they are able to do so. There is a general consensus that refugees under the pilot will remain eligible for the suite of government services currently available to humanitarian entrants. This includes Medicare, Centrelink, the Adult Migrant English Program and Job Services Australia. The use of a legally binding contract that outlines sponsor obligations and responsibilities is strongly supported in the submissions.
A safety net	There is clear support that the pilot have an adequate safety net to ensure that refugees which will ensure that refugees sponsored through the program are able to settle in Australia and become fully participating members of the Australian community to the same extent as refugees who are not participating in the pilot. A number of submission suggested that HSS services providers be used as a back-up, if the sponsor fails to meet their responsibilities. Others suggest the use of a bond, to ensure that sponsored adequately provide for refugees. However many organisations feel that an upfront payment to contribute to cost of these services would be prohibitive on a number of community organisations which have limited financial resources.

ORGANISATIONS AND INDIVIDUALS WHO PROVIDED RESPONSES

s. 47G(1)(a), s. 47F(1)



Released by Department of Home Affairs
under the Freedom of Information Act 1982

Participants in consultations

s. 47G(1)(a), s. 47F(1)





To Minister for Immigration and Citizenship

Subject Proposed pilot private community sponsorship model

Timing Urgent. Following discussion with Advisor ^{s. 22(1)(a)(ii)} please action by Friday 14 September 2012 to enable preparation for your consideration of a detailed submission and development and circulation of draft submission to Government by the end of September.

Recommendations

That you:

1. Note that initial consultations have highlighted the constraints on a pilot due to existing legislation and international obligations under the Refugees Convention.

noted / please discuss

s. 47C(1)

4. Note that either option for the pilot will require further significant legal and policy work to be implemented.

noted / please discuss

5. Note following your decision on Recommendation 2 we will develop a detailed submission outlining the model.

noted / please discuss

Minister

See Comments.

Signature.....

Date: 19/09/2012

Key Issues

1. Following consultations with key humanitarian organisations, community and faith-based organisations, the Refugee Resettlement Advisory Council (RRAC), other DIAC areas, and APS agencies, we have identified the most viable private/community refugee sponsorship models for your consideration.
2. The models have been developed with due consideration of current legislative arrangements; Australia's international obligations; constraints within the current visa framework; possible risks to settlement outcomes; and the need to balance the attraction to potential sponsors and potential savings to the Budget.

s. 47C(1)



s. 47C(1)



13. Once you indicate your preferred model, we will develop further details and bring back a submission.

s. 47C(1)



s. 42(1)



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17. The Canadian Private Sponsorship of Refugees (PSR) program is fully supported by a legislative framework, including:

- The *Immigration and Refugee Protection Act* authorises groups of Canadians to sponsor a Convention refugee or a person in similar circumstances and gives power for a sponsor's undertaking to be legally binding.
- The *Immigration and Refugee Protection Regulations* specifically gives power to the Canadian Minister to enter into an agreement with a sponsor for the purpose of facilitating the sponsorship of refugees.
- The Canadian Regulations also outline the obligations of the sponsor and the remedies available to the Canadian Government should the sponsor default on their obligations.

18. Further information on the Canadian PSR program is at [Attachment B](#).

s. 47C(1)

Sponsor arrangements

28. Mainstream community organisations, such as s. 47G(1)(a) and the s. 47G(1)(a) s. 47G(1)(a) 'partnering' with ethnic organisations, such as the s. 47G(1)(a) s. 47G(1)(a) would be the core sponsor option.

- This is the main sponsor model in Canada.

s. 47C(1)

Background

33. On 8 May 2012, following the agreement of the Prime Minister, you announced the Government's intention to seek the community's views on the feasibility of a pilot of a private / community sponsorship program for refugees.

s. 47C(1)

Client service implications

35. Following consideration and approval by Government, and in consultation with Client Strategy and Performance Division and other departmental areas, Humanitarian Branch will develop publicly available information, including forms and fact sheets, for potential applicants and sponsoring organisations.

Consultation – internal/external

36. Internal: Citizenship, Settlement and Multicultural Affairs Division; Client Strategy and Performance Division; Financial Services and Strategy Division; Governance and Legal Division; Migration and Visa Policy Division; Technology Services Division.

37. Commonwealth Government: Department of Education, Employment and Workplace Relations; Department of Families, Housing, Community Services and Indigenous Affairs; Department of Finance and Deregulation; Department of Health and Ageing; Department of Human Services; Department of Industry, Innovation, Science, Research and Tertiary Education; Department of Prime Minister and Cabinet; Department of Regional Australia, Local Government, Arts and Sport; Department of Transport and Infrastructure; Department of Treasury.

38. External:

- 61 organisations have provided responses to the discussion paper. In these responses, these organisations noted:
 - Their broad support for the community sponsorship concept
 - A willingness to provide services similar to those currently provided by DIAC through the HSS program
 - Their concerns about the capacity in the community sector to provide the funding to offset the Government's costs of settling humanitarian entrants
 - A number of settlement service providers have also raised concerns about the expertise of sponsors to provide settlement services at the required professional level
 - A summary of the key issues raised in the submissions, including a list of submission authors, is at [Attachment C](#).
- The Department has also held individual meetings with a range of community and faith-based organisations, including s. 47G(1)(a)

[REDACTED] (list at [Attachment D](#)).

Financial/systems/legislation implications

s. 47C(1)

40. The Department will also need to develop monitoring and governance structures/arrangements for the successful delivery of the pilot, including potentially sponsor orientation and training, and quality assurance mechanisms.

41. These additional arrangements are currently not funded under the Humanitarian Program planning levels and will need to be managed within current available departmental resourcing.

- For example:
 - A 2007 evaluation of the Canadian PSR program found the costs of administering the PSR program were higher than the government-assisted refugees program
 - The Canadian Government budgeted more than C\$640 000 in 2009–10 on their Refugee Sponsorship Training Program, consultations and meetings with and between sponsoring organisations.

s. 47C(1)

Attachments

Attachment A Summary of main government assistance by agencies to permanent humanitarian visa holders and possibility of provision by the sponsor

Attachment B Canadian Private Sponsorship of Refugees (PSR) Program

Attachment C Summary of key issues raised in community submissions, and organisations and individuals who provided responses

Attachment D Participants in consultations

Authorising Officer

s. 47F(1)

Jim O'Callaghan
Assistant Secretary, Humanitarian Branch

11/ 9 / 12
Ph: s. 22(1)(a)(ii)

Through: Vicki Parker, First Assistant Secretary, Refugee, Humanitarian and International Policy Division. *NR 1219*

Contact Officer s. 22(1)(a)(ii) Director, Policy and International Engagement Section,
Humanitarian Branch, s. 22(1)(a)(ii)

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CC

Minister for Multicultural Affairs

Acting Secretary

Deputy Secretaries

A/g First Assistant Secretary, Citizenship, Settlement and Multicultural Affairs Division

First Assistant Secretary, Migration and Visa Policy Division

First Assistant Secretary, Governance and Legal Division

First Assistant Secretary, Client Strategy and Performance Division

Chief Financial Officer

Chief Information Officer

Assistant Secretary, Multicultural and Settlement Policy Branch

Assistant Secretary, Settlement and Multicultural Programs Branch

Assistant Secretary, Legal Framework Branch

Assistant Secretary, Litigation and Opinions Branch

Assistant Secretary, Visa Framework and Family Policy Branch

Assistant Secretary, Financial Strategy and Budgets Branch

National Communications Manager

Minister's Comments

s. 42(1)

Summary of main Government assistance by agencies to permanent humanitarian visa holders and possibility of provision by the sponsor.

PRE-DEPARTURE	POST-ARRIVAL	
<p>DIAC – visa health check and pre-departure medical check.</p> <ul style="list-style-type: none"> Necessary to conduct. s. 47C(1) 	<p>DIAC – Humanitarian Settlement Services (HSS); Complex Case Support (CCS) and Settlement Grants Program (SGP)</p> <p>s. 47C(1)</p> <ul style="list-style-type: none"> If provided by a sponsor under contract, DIAC would incur compliance monitoring costs. CCS may be required to assist private sponsors with high-needs cases. 	<p>FaHCSIA – Social Security: Income support</p> <ul style="list-style-type: none"> Under the <i>Social Security Act</i> 1991 all permanent humanitarian visa holders are eligible for all income support payments immediately on arrival, subject to a tapering income test. This includes access (where eligible) to Austudy, Newstart, Parenting Payment, Special Benefit, Crisis Payment, Widow Allowance, Youth Allowance, Mature Age Allowance and a range of other benefits. Under the <i>Refugees Convention</i> States shall accord to refugees the same treatment with respect to public relief and assistance as is accorded to their nationals (Article 23) and accord refugees the same treatment with respect to social security as accorded to nationals, unless prescribed otherwise by law or regulation (Article 24). If a private sponsor were to agree to pay an income support payment to a privately-sponsored humanitarian entrant, the payments would need to exceed \$23,647 for a single person with no dependants, and \$43,160 combined for a partnered couple before Newstart support would cease. <p>FaHCSIA – Social Security: Family payments</p> <ul style="list-style-type: none"> Additionally, under the <i>Social Security Act</i> 1991 there are a range of benefits that a person can access if they are not receiving income support. These benefits include Family Tax Benefits Part A & B, Child Care Benefit, Baby Bonus, School Kids bonus and possibly Rent Assistance. For example, a family with five children receiving \$43,160 from a private sponsor would also receive an additional \$26,641 in Family Tax Benefit.
<p>DIAC – Australian Cultural Orientation Program (AUSCO)</p> <ul style="list-style-type: none"> Usually provided by IOM under contract with DIAC. AUSCO is voluntary. s. 47C(1) 	<p>DIAC – Adult Migrant English Program (AMEP)</p> <ul style="list-style-type: none"> Under the <i>Immigration (Education) Act</i> 1971 it is mandatory for the Minister to provide access to English language classes for permanent visa holders. Eligibility is for up to five years after visa commencement date. Under the <i>Refugees Convention</i> (Article 22) States shall accord to refugees the same treatment as is accorded to nationals with respect to elementary education and treatment as favourable as possible or not less favourable than that accorded to aliens generally in the same circumstances in respect to education other than elementary education. <p>s. 47C(1)</p>	<p>DIISRTE – Higher Education Contribution Scheme (HECS)</p> <ul style="list-style-type: none"> Under the <i>Higher Education Support Act</i> 2003 all permanent humanitarian visa holders are immediately eligible for assistance. Under the <i>Refugees Convention</i> (Article 22) States shall provide to refugees treatment that is favourable or not less favourable than that accorded to other aliens generally in the same circumstances in respect to education other than elementary education.
<p>DIAC – Client travel costs</p> <ul style="list-style-type: none"> s. 47C(1) 	<p>DEEWR – Job Services Australia (JSA)</p> <ul style="list-style-type: none"> Eligibility for JSA is linked with receipt of qualifying income support payments. Under the <i>Social Security Act</i> 1991, all permanent humanitarian visa holders are eligible for such payments. Under the <i>Refugees Convention</i> (Article 17) States must accord to refugees the most favourable treatment accorded to nationals in the same circumstances as regards the right to engage in wage-earning employment. <p>s. 47C(1)</p>	<p>DOHA – MEDICARE / PBS</p> <ul style="list-style-type: none"> Under the <i>Health Insurance Act</i> 1973 all permanent visa holders are eligible for Medicare and the PBS. Under the <i>Refugees Convention</i> (Article 24) States must accord refugees the same treatment with respect to social security (including for sickness) as accorded to their own nationals, unless prescribed by law or regulation. <p>s. 47C(1)</p>
<p>DOHA – Program of Assistance for Survivors of Torture and Trauma (PASTT)</p> <p>s. 47C(1)</p>		

Legend

Possible to be funded by sponsor.

Required to be funded by

Released by Department of Home Affairs
under the Freedom of Information Act 1982

Canadian Private Sponsorship of Refugees (PSR) Program

The Canadian Private Sponsorship of Refugees (PSR) program was implemented in 1978. The PSR is one of two principal methods of resettlement used by the Canadian Government, the other being the Government Assisted Refugee (GAR) program.

Since 1978, more than 200 000 people have migrated to Canada under the PSR program. The PSR aims to uphold Canada's humanitarian tradition in the resettlement of refugees and provide protection of those in need; to strengthen partnerships with civil society including NGOs; and to provide complementary protection for those who might not fall within the Refugee Convention's definition of a refugee.

In 2010, the Government of Canada announced it would gradually increase the number of refugees to be resettled under this program so that by 2013, the bottom end of the range would rise to 4500 persons and the upper limit would be increased to 6500 persons. The Canadian Government has set an admissions target of around 5500 people under the PSR program in 2012.

Further, as part of the Federal Budget in 2012, the government plans to reduce the number of government-assisted refugees (GARs) to be resettled in a year by 1000 and increase the number of privately sponsored refugees (PSRs) by the same amount. The plan will be phased in over three years starting in 2013. This means by 2015 there could be up to 6500 privately sponsored named refugees admitted and up to an additional 1000 United Nations High Commissioner for Refugees (UNHCR) referred refugees matched with sponsors in Canada.

Federal income support through the Resettlement Assistance Program (RAP) will be available to help private sponsors resettle these additional refugees referred by the UNHCR.

Under the PSR program, refugees are sponsored by three main groups:

- Sponsorship Agreement Holders (SAHs)—incorporated organisations that have signed a formal sponsorship agreement with Citizenship and Immigration Canada (CIC) to sponsor refugees.
- Community Sponsors (CSs)—organisations that do not have a formal agreement with the CIC and may sponsor two cases per year.
- Groups of Five (G5s)—permanent residents or Canadian citizens who do not have a formal agreement with the CIC and are acting together for the purposes of sponsoring a refugee or refugee family.

Refugees are identified either:

- by the sponsoring group putting the refugee's name forward to the Canadian Government; or
- by a visa office putting forward cases referred by the UNHCR that have already been selected.
- SAHs may refer persons whom they believe to be refugees under the Refugee Convention or members of the Country of Asylum class. This definition is broader than the Refugee Convention definition. Currently, G5s and CSs may also refer members of either refugee class; however, the Government of Canada has announced its intention to limit G5s and CSs to sponsoring only Convention refugees who have undergone a positive refugee status determination.

Refugees are responsible for their medical and travel costs for themselves and their dependent family members, although there are loan options available to refugees if they are unable to cover these costs.

People sponsoring refugees in Canada are expected to provide a level of support equal to that of the prevailing rates for social assistance in the expected community of settlement. This includes start-up costs such as one-time payment for household items, furniture, linens, food staples, clothing, deposit for utilities, phone installation and first month's rent. Refugees are expected to contribute to their own settlement costs from funds they bring to Canada or earn during their sponsorship period.

In addition to providing financial support, sponsors assist refugees by:

- arranging accommodation and providing basic furniture
- providing adequate clothing
- ensuring an understanding of the budget for the refugees' support
- orientation into the community, and assisting with local transportation
- helping access local services including banking and social services
- registering them for health care, and helping find a family doctor and other required medical care
- help with registering children for school
- helping access English language classes if required
- help with finding employment
- providing 24 hour emergency support¹

Refugees arriving in Canada under the PSR program are eligible for the Interim Federal Health Program, which provides health coverage between their arrival in Canada and their eligibility for the relevant provincial health coverage. These refugees are also eligible for the Canadian child care benefit if they have children aged under 18 years.²

As permanent residents, adult entrants under the PSR program are able to access free English or French language training through the Language Instruction for Newcomers to Canada.³ They also have access to all the Settlement Program services available to all newcomers.

In comparison, under the GAR program, refugees are provided with income support directly by the Canadian Government for up to one year from the date of arrival.

The Canadian Government has provided the following cost breakdown for refugee resettlement, per refugee, in 2008–09. In addition, in 2009–10, the Canadian Government budgeted almost C\$600 000 for the Refugee Sponsorship Training Program.

¹ Refugee Sponsorship Training Program (2004), *Information for Privately Sponsored Refugees*, www.rstp.ca/images/public/psrenglish.pdf.

² Citizenship and Immigration Canada, '2.19 Other useful information', in *Guide to the Private Sponsorship of Refugees Program*, www.cic.gc.ca/english/resources/publications/ref-sponsor/section-2-19.asp.

³ Citizenship and Immigration Canada, 'Learning English or French', in *Welcome to Canada: What you should know*, www.cic.gc.ca/english/resources/publications/welcome/wel-03e.asp.

Cost Breakdown for Refugee Resettlement, per refugee (C\$), 2008–09

Element	Cost per Government Assisted Refugee (GAR)	Cost per Privately Sponsored Refugee (PSR)
Income Support (start-up & monthly allowances) ⁴	\$6986	\$0
Arrival, Port of Entry Reception and Clothing	\$872	\$872 ⁵
Temporary accommodation, food and incidentals	\$456	\$0
Interim Federal Health (IFH)	\$318	\$318
SPO admin costs	\$349	\$0
Subtotal	\$8981	\$1190

Processing		
Inland	\$2129	\$1280
Overseas	\$1549	\$1549
Settlement Services		
HOST	\$561	\$561
LINC	\$1991	\$1991
ISAP	\$1886	\$1886
Total	\$17 097	\$8457

A 2007 evaluation of the PSR program found that PSRs generally become self-supporting far more quickly than GARs (ie within 6 months upon arrival). It found that PSRs enter the labour force more quickly than GARs and are more likely to have higher employment earnings in the first few years after arrival. However, over time these differences diminish.

The key challenges identified by sponsors in meeting needs of refugees are in assisting them to: find affordable accommodation; access health care services; gain meaningful employment; and improve language skills. They also have access to the same suite of settlement services all newcomers have access to under the Settlement Program.

The evaluation also found that on a per-application basis, applications under the PSR program were more expensive to process than GAR applications. However, the evaluation found that while the PSR program is more costly to administer, the GAR program was more costly to the Canadian Government because of the income support provided during the first year.⁶

⁴ Income support includes one-time payments for basic household needs and staple items, as well as rent, etc.

⁵ Based on varying levels of need the actual level of arrival, port of entry reception and clothing services for PSRs also vary. Based on this assumption, it is estimated that PSR costs for these services are actually about 50 per cent of those for GARs (\$436).

⁶ Citizenship and Immigration Canada (2007), *Summative Evaluation of the Private Sponsorship of Refugees Program*, www.cic.gc.ca/english/resources/evaluation/psrp/psrp-summary.asp.

Summary of key issues raised in community submissions

The Department has received 61 responses to the discussion paper from key humanitarian organisations, community organisations, faith-based groups and State, Territory and Local Governments.

Issues for consideration	Responses
Would a pilot of a private/community sponsorship program for refugees be feasible?	The submissions are broadly supportive of the private/community sponsorship program. The submissions outline that the pilot would be both feasible and welcome in Australia. However many submissions highlight that there are a number of challenges that need to be addressed in order for this pilot to be successfully implemented in an Australian context. s 47G(1)(a) and a number of smaller refugee support groups expressed concern that the pilot may create a 'second class' of refugees. s. 47G(1)(a) emphasised that the pilot would only be feasible if significant resources are allocated for in-depth planning, implementation and evaluation. These concerns have also been voiced by a number of Commonwealth Government agencies including FAHCSIA and DEEWR.
Who should be able to sponsor refugees under a pilot?	The submissions identified a number of groups that could sponsor refugees under the pilot. <ul style="list-style-type: none"> Community organisations and groups: The majority of submissions support the idea that community groups and organisations be able to sponsor refugees. There is a clear consensus that any such group would be experienced with settling and supporting refugees. Individuals: responses are mixed on whether individuals should be able to sponsor refugees. s. 47G(1)(a) both expressed the view that resettled refugees should be able to sponsor family members to come to Australia under this pilot. This view is supported by a number of ethnic and cultural groups. However other submissions outline those individuals may not be able to adequately provide the financial or settlement services required by refugees.
Identifying refugees for sponsorship	The majority of submissions outline that refugees selected for the pilot should be mandated by the UNHCR and meet the criteria already established under the Offshore Humanitarian program. A significant number of submissions call on the government to use this pilot as a means of addressing the limited places available for 'split family' applications. Many submissions see the pilot as a way to facilitate family reunion. Other submissions suggest that refugees should be selected based on skills, English proficiency and ability to successfully settle.
Responsibilities of sponsors	The large majority of submissions are of the view that sponsors will provide support similar to that currently provided by HSS providers. The general consensus is that sponsors will be responsible for providing airfares, initial accommodation, orientation support, household goods, and in some cases assistance in finding employment. Whilst some submissions outline that the sponsor should provide financial support, there is no suggestion that this will be provided in lieu of Government income support. s. 47G(1)(a) and a number of ethnic community organisations suggest that they will require the refugee to pay back money for airfares and initial rent once they are able to do so. There is a general consensus that refugees under the pilot will remain eligible for the suite of government services currently available to humanitarian entrants. This includes Medicare, Centrelink, the Adult Migrant English Program and Job Services Australia. The use of a legally binding contract that outlines sponsor obligations and responsibilities is strongly supported in the submissions.
A safety net	There is clear support that the pilot have an adequate safety net to ensure that refugees which will ensure that refugees sponsored through the program are able to settle in Australia and become fully participating members of the Australian community to the same extent as refugees who are not participating in the pilot. A number of submission suggested that HSS services providers be used as a back-up, if the sponsor fails to meet their responsibilities. Others suggest the use of a bond, to ensure that sponsored adequately provide for refugees. However many organisations feel that an upfront payment to contribute to cost of these services would be prohibitive on a number of community organisations which have limited financial resources.

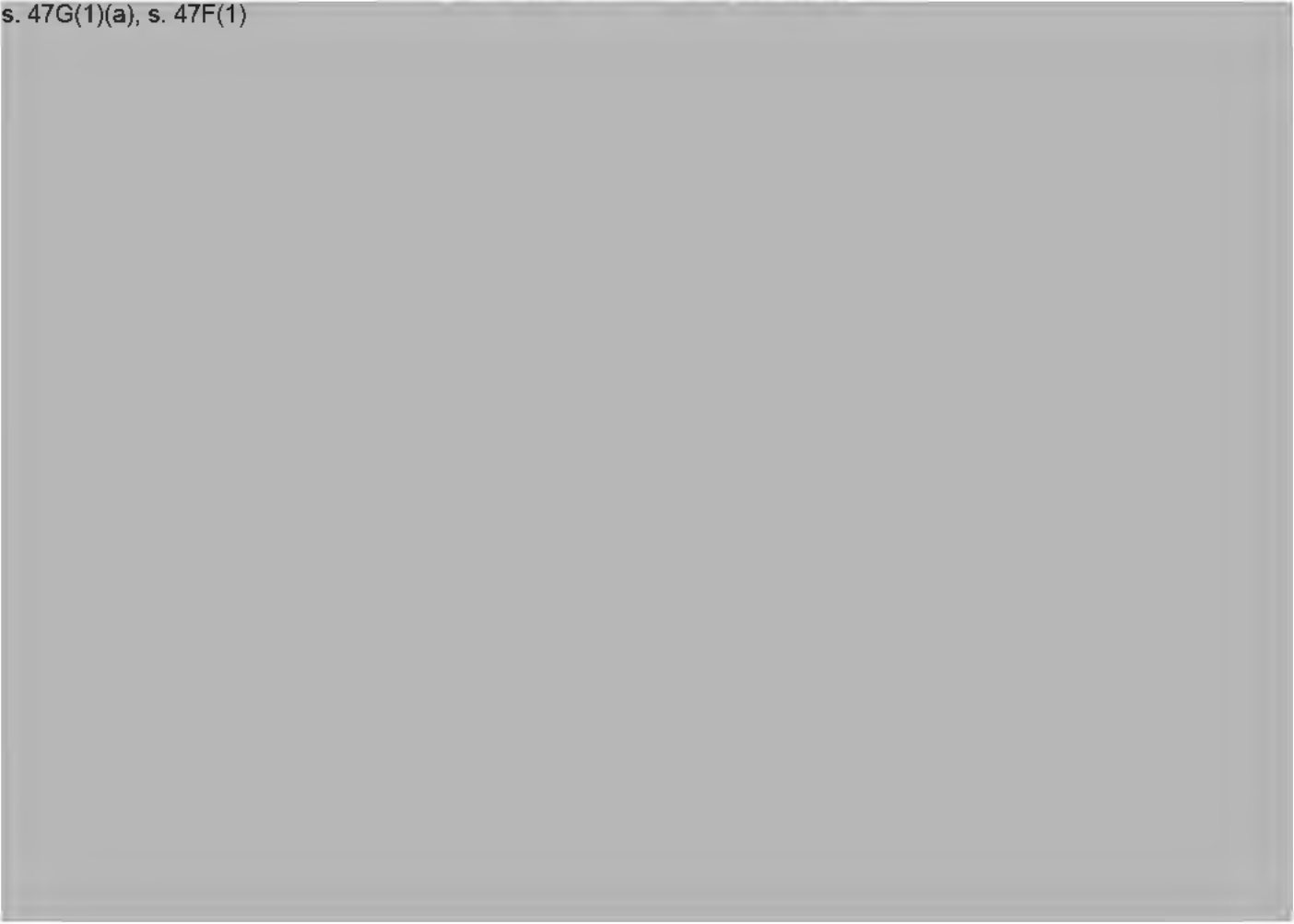
ORGANISATIONS AND INDIVIDUALS WHO PROVIDED RESPONSES

s. 47G(1)(a), s. 47F(1)



Participants in consultations

s. 47G(1)(a), s. 47F(1)





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 Sanctuary 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. 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)

- 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.
- 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.
- The current CPP provides an alternate resettlement pathway, rather than expanding overall resettlement capacity.
- 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.
- 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 Sanctuary 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. 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)

<ul style="list-style-type: none"> 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.
<ul style="list-style-type: none"> 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.
<ul style="list-style-type: none"> The current APO model is appropriate for CSP, but design and implementation should be informed by external review. APOs should not assess applications.
<ul style="list-style-type: none"> 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.
<ul style="list-style-type: none"> 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.
<ul style="list-style-type: none"> 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.
	<ul style="list-style-type: none"> • 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
ss. 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)

- 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.
- 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.
- 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.
- *'...humanitarian entrants do not need the kind of "encouragement" suggested by the introduction of an AOS to enter the Australian workforce...'*
- 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.
- 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.
- 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(1)(a) 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.
- 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. 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. An AoS is at odds with the basic objectives of the Humanitarian Program. An AOS leads to inequality through finances and does not consider settlement barriers faced by humanitarian entrants. 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).

s. 47G(1)(a)

- 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.
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- 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.
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- 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.
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- 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).

s. 47G(1)(a)

- 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.

s. 47G(1)(a)

- 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.
	<ul style="list-style-type: none"> 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.



To Minister for Immigration and Border Protection

Subject Community support programme for humanitarian clients

Timing s. 47C(1)

Recommendations

That you:

1. note the findings of the evaluation of the Community Proposal Pilot (the Pilot) at Attachment A (para. 9); noted / please discuss
2. s. 47C(1) s. 47C(1)
3. s. 47C(1) s. 47C(1)
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Minister for Immigration and Border Protection

Signature.....

Date:...../...../2015

Minister's Comments				
Rejected Yes/No	Timely Yes/No	Relevance <input type="checkbox"/> Highly relevant <input type="checkbox"/> Significantly relevant <input type="checkbox"/> Not relevant	Length <input type="checkbox"/> Too long <input type="checkbox"/> Right length <input type="checkbox"/> Too brief	Quality Poor 1.....2.....3.....4.....5 Excellent Comments:

Key Issues

1. Since June 2013, the Department of Immigration and Border Protection (the department) has been operating a trial community support programme — known as the Community Proposal Pilot (the Pilot) — as part of Australia's Humanitarian Programme.
2. The Pilot provides opportunities for Australian communities to work with the Australian Government through community organisations, known as Approved Proposing Organisations (APOs), to identify people for a humanitarian visa and be directly responsible for their resettlement. Up to 500 visas have been allocated to the Pilot in each programme year from 2013–14 to 2015–16. These visas are drawn from the overall humanitarian intake.

s. 47C(1)

4. In May (MS15-001922 refers) we committed to provide you with a possible model for a full programme following consultations with communities and other Government agencies.
5. Following the consultations, and the completion of an evaluation of the Pilot, this submission seeks your agreement to a proposed model for a full programme.

s. 47C(1)

Evaluation of the Pilot

7. A multi-stage departmental evaluation of the Pilot considered the appropriateness of the community support concept and the effectiveness of the Pilot model.

8. s. 47C(1)

9. A summary of the key findings of the evaluation is at Attachment A.

Consultations on a full programme

10. The department consulted widely with communities, APOs, refugee and settlement organisations, and other Government agencies on possible features of a full programme.

11. Overall there was strong support for the introduction of a full community support programme, provided it is designed to uphold humanitarian principles and that visas granted under the programme do not take away from places that would otherwise be available under existing resettlement pathways, such as the Refugee or Special Humanitarian Programme (SHP) categories of the Humanitarian Programme.

12. Summaries of the outcomes from consultations are at Attachment B and Attachment C.

s. 47C(1)

Visa Application Charge (VAC)

17. Feedback from consultations regarding the VAC was mixed.

- Many communities saw the VAC as prohibitive and called for its reduction or removal. However, APOs claimed the VAC was an important filter on demand and helped ensure that applicants were proposed by people and communities with the means to adequately provide for their settlement in Australia.

- The evaluation found there was overwhelming demand for the Pilot despite the VAC. It noted that for some communities participation in the Pilot was more cost effective than constantly remitting funds to support family overseas. However, it also noted that other families may have felt compelled to pay the VAC, whatever the amount, out of desperation to secure their family members.

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[REDACTED]

Background

Responsibility for settlement of humanitarian entrants

33. Responsibility for settling humanitarian entrants was transitioned from the Immigration and Border Protection portfolio to the Social Services portfolio as part of the 2013 Machinery of Government changes. The department no longer has any dedicated settlement function or expertise. However, in the interest of keeping all functions relating to the Pilot together, oversight of settlement of Pilot entrants has to date remained with the department.

Consultation – internal/external

34. **Internal:** Refugee and Humanitarian Visa Management Division; Legal Division; International Division; Finance Division.

External: Public discussion paper; s. 47G(1)(a) s. 47G(1)(a)

Approved Proposing Organisations.

Commonwealth Government: Department of Education and Training; Department of Employment; Department of Human Services; Department of Social Services.

Consultation – Secretary/Commissioner

35. The Secretary and Commissioner were not consulted on the approach in the submission.

Client service implications

36. Nil.

s. 47C(1)

Attachments

- Attachment A** Evaluation of the Community Proposal Pilot — Key Findings
- Attachment B** Community Consultation — Summary of Outcomes
- Attachment C** Government Consultations — Summary of Outcomes
- Attachment D** Proposed Community Support Programme Model
- Attachment E** Overview of the AoS Requirement

Authorising Officer
<p>Cleared by:</p> <p>Linda Geddes A/g Deputy Secretary Policy Group</p> <p>Date:</p> <p>Ph: s. 22(1)(a)(ii)</p>

Contact Officer s. 22(1)(a)(ii), Assistant Secretary Humanitarian, Family and Citizenship Policy Branch,
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Through Richard Johnson, A/g First Assistant Secretary, Immigration and Citizenship Policy Division
Ph: s. 22(1)(a)(ii)

CC Secretary
Commissioner
Deputy Secretaries/Deputy Commissioners
First Assistant Secretary, Strategic Policy and Planning
First Assistant Secretary, Refugee and Humanitarian Visa Management
Assistant Secretary, Refugee and Humanitarian Programme
Assistant Secretary, Policy Research and Statistics