



**Submission on  
Australia's Humanitarian Program 2024-2025**

**June 2024**

## **Acknowledgement of Country**

SSI acknowledges the Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work. We pay respect to Elders past and present and recognise their continuous connection to Country.

## **Background**

SSI welcomes the opportunity to provide this submission to the Department of Home Affairs on Australia's Humanitarian Program 2024-2025.

SSI is a national non-for-profit organisation that delivers a range of human services that connect individuals, families, and children from diverse backgrounds with opportunities – including settlement support, disability programs, community engagement initiatives and training and employment pathways. At the heart of everything we do is a drive for equality, empathy, and celebration of every individual.

SSI was founded in Sydney in 2000 with the aim of helping newly arrived refugees settle in Australia. Over time, our expertise in working with people from diverse cultural and linguistic (CALD) backgrounds served as the foundation for a gradual expansion into other social services and geographical areas.

In 2018, SSI merged with Queensland-based Access Community Services, and in 2019 opened in Victoria, providing an extensive footprint across the eastern coast of Australia. In FY2023, SSI supported over 56,000 clients across more than 59 programs and community-based services. We are also a leading provider of evidence-based insights into the social sector and are known as an organisation that can reach communities considered by many to be hard to reach.

SSI is the largest provider in NSW of the Humanitarian Settlement Program (HSP), funded by the Australian Government, to newly arrived refugees and other humanitarian entrants. It also leads a consortium, the NSW Settlement Partnership, of more than 20 partner agencies which deliver the Settlement Engagement and Transition Supports (SETS) program, also funded by the Australian Government, to refugees and eligible family stream migrants across NSW. SSI is also one of 11 Approved Proposing Organisations in the Community Support Program, liaising with local communities to identify people to propose for a humanitarian visa, conducting relevant screening and coordinating the visa application process and assurance over the provision of settlement services.

Settlement services have seen first-hand the impacts of the pandemic locally during the past four years. This included supporting humanitarian entrants in Australia at a time when the Humanitarian Program had virtually ceased due to international travel restrictions. Settlement services have also been at the forefront of the response to support people fleeing conflicts in Afghanistan, and the Ukraine. More recently, we have adapted to respond to issues among people fleeing conflict in Gaza and the Palestinian Occupied Territories and the Sudan working flexibly, outside of the scope of HSP service delivery, to meet humanitarian needs with funding from our own and donor resources.

SSI has actively contributed to the review of the settlement services model and we look forward to working collaboratively with the Australian Government to implement the new model and we wholly endorse the Australian Government's commitment to increase the humanitarian intake over time.

## Summary of recommendations

### 1. Humanitarian Program composition

#### **Recommendation 1:**

***Develop a plan and clear pathway to increase the humanitarian intake to 27,000 places as soon as possible. The higher number of places will create better opportunities for a mixed composition in the Humanitarian Program over time.***

#### **Recommendation 2:**

***When determining composition, Australia's 2024-25 Humanitarian Program and all pathways should continue to be guided by its primary objectives to provide protection and permanent resettlement solutions for refugees and displaced persons because of conflict, persecution and human rights abuses.***

### 2. Increasing Humanitarian Settlement Program transparency

#### **Recommendation 3:**

***Ensure that refugees who are privately sponsored to come to Australia through the Community Support Program and the Community Refugee Integration and Settlement Pilot are allocated places that are additional to the existing Humanitarian Program intake.***

#### **Recommendation 4:**

***Resolve the current backlog of cases under the Humanitarian Program and Community Support Program, through the planned establishment of the 10,000 Complementary Pathways.***

#### **Recommendation 5:**

***Adopt a triage system that processes all Humanitarian Program and complementary pathway applications.***

### 3. Humanitarian Program responses to future resettlement crises

#### **Recommendation 6:**

***The Department of Home Affairs should develop and adopt an Emergency Humanitarian Crisis Settlement Framework that articulates how the Australian Government will work with affected communities and the settlement sector to respond to emergency humanitarian settlement crises proactively and collaboratively.***

#### **Recommendation 7:**

***Ensure that funding of settlement services reflect increased operational costs and is commensurate with increasing levels of demand. As a first step, implement the Minister for Finance's 24 April 2024 announcement that all agencies are mandated to pass on indexation to community sector organisation grants.***

4. Expanding and making complementary pathways scalable

**Recommendation 8:**

***Complementary pathways adopt the following core principles: A coherent national approach; Additionality; Durability; Supported settlement and a safety net; and Accessibility.***

5. Supporting humanitarian entrants' economic aspiration and contribution

**Recommendation 9:**

***Ensure dedicated funding to enable economic participation is included as a core deliverable of the new Humanitarian Support Program service contracts.***

**Recommendation 10:**

***Expand humanitarian settlement to additional regional locations and a wider range of metropolitan areas, leveraging the lessons from the successful model led by SSI in Australia's newest regional settlement location, Armidale, NSW.***

## Response to Discussion Paper Questions

**1. What is the ideal composition of Australia's 2024-25 Humanitarian Program and why? What do you think should be the proportion split between the Refugee and Special Humanitarian Program categories in the offshore component of the Humanitarian Program?**

***Recommendation 1:***

***Develop a plan and clear pathway to increase the humanitarian intake to 27,000 places as soon as possible. The higher number of places will create better opportunities for a mixed composition in the Humanitarian Program over time.***

***Recommendation 2:***

***When determining composition, Australia's 2024-25 Humanitarian Program and all pathways should continue to be guided by its primary objectives to provide protection and permanent resettlement solutions for refugees and displaced persons because of conflict, persecution and human rights abuses.***

### **Australia's role as a resettlement global citizen**

The composition of Australia's 2024-25 Humanitarian Program and all pathways should continue to be guided by its primary objectives to provide protection and permanent resettlement solutions for refugees and displaced persons as a result of conflict, persecution and human rights abuses.

Accordingly, the Australian Government should create a new plan to ensure that the Humanitarian Program intake reaches 27,000 places. While SSI recognises that the Discussion Paper outlines the Government's intention to maintain 20,000 Humanitarian Program places in 2024-25, a revised plan that clearly outlines the path towards 27,000 places in line with the Australian Government's commitment is needed.<sup>1</sup>

A clear pathway to this increase will make a modest yet important contribution against the backdrop of the latest UNHCR projections that almost three million refugees needed resettlement in 2024 and help to address the prolongation of mass displacement situations, the emergence of new conflicts and the impacts of climate change.<sup>2</sup>

Australia, as a strong global citizen, is in a position to increase its humanitarian intake, considering leading resettlement countries such as the USA and Canada increased their refugee intakes for 2024 to 125,000<sup>3</sup> and over 76,000 in 2024<sup>4</sup> respectively.

A clear plan to scale-up Australia's Humanitarian Program from 2025-26 onwards will assist in meeting the massive shortfall in resettlement places globally, facilitate refugees already resettled in Australia to be re-united with family members and allow Australia to demonstrate its credentials as a strong global citizen and help to meet some of the 23 pledges made by the Australian Government at the Global Refugee Forum.

**2. The Humanitarian Program continues to face significant pressure, with demand greatly exceeding available places. While priority is given to cohorts who are outside their home country and have the greatest resettlement need, are there other measures the government could take to increase transparency and avoid giving false hope (for example, through changes to application processes)?**

***Recommendation 3:***

***Ensure that refugees who are privately sponsored to come to Australia through the Community Support Program and the Community Refugee Integration and Settlement Pilot are allocated places that are additional to the existing Humanitarian Program intake.***

***Recommendation 4:***

***Resolve the current backlog of cases under the Humanitarian Program and Community Support Program, through the planned establishment of the 10,000 Complementary Pathways.***

***Recommendation 5:***

***Adopt a triage system that processes all Humanitarian Program and complementary pathway applications.***

## **Transparently responding to program demand**

The Australian Government's trial of a community-supported settlement pathway for refugees, the Community Refugee Integration and Settlement Pilot (CRISP) aims to develop a model for community sponsorship of refugees who do not have existing links to Australia. While this is a welcome aim, and SSI welcomes the one-year extension of the CRISP to June 2026 announced in the May 2024 Federal Budget, it remains unclear whether places allocated to that pilot are in addition to Australia's existing intake, or instead take places from within the Humanitarian Program. Similarly, people who secure places under the Community Support Program (CSP) are taking places from within the Humanitarian Program.

While the Minister for Immigration at recent sector consultations in May 2024 indicated the intention to not have CSP places be taken from the Humanitarian Program, there was no further elaboration on when that position would be implemented.

Furthermore, while the Discussion Paper refers to current engagement with stakeholders to gradually increase community sponsored and other complementary pathway places to 10,000 per year (in addition to the core Humanitarian Program intake), this level can be potentially reached by immediately addressing the existing backlog which SSI estimates to be approximately 8,500 places for the CSP alone. Doing this would avoid the risk of prospective applicants also applying through the CSP, under the incorrect belief that the wait time under that pathway is the same as under the Humanitarian Program.

One innovation that could better resolve backlog of cases that arise is to adopt an overarching triage system for all humanitarian program and complementary pathway applicants. This triage system can ensure streamlined assessments and allocation of places so that applicants have the most opportunity to be considered for each resettlement pathway that they are potentially eligible for. This triage system would involve the Department assessing which programs a person is eligible for and assigning corresponding places according to need. While each program is distinct (Humanitarian Settlement Program, Community Support Program etc.) the administration of the assessment and allocation

functions should not necessarily be separated as well. Adopting a triage or single assessment process could be more efficient in not only determining who is eligible, but also in allocating the available places across all programs. This improvement is responsive to the reality that, from an applicant's perspective, their main aim is to secure protection; which creates an incentive to apply for any pathways that are available.

### **3. How can the Humanitarian Program better respond to future resettlement crises?**

#### ***Recommendation 6:***

***The Department of Home Affairs should develop and adopt an Emergency Humanitarian Crisis Settlement Framework that articulates how the Australian Government will work with affected communities and the settlement sector to respond to emergency humanitarian settlement crises proactively and collaboratively.***

#### ***Recommendation 7:***

***Ensure that funding of settlement services reflect increased operational costs and is commensurate with increasing levels of demand. As a first step, implement the Minister for Finance's 24 April 2024 announcement that all agencies are mandated to pass on indexation to community sector organisation grants.***

### **An Emergency Humanitarian Crisis Settlement Framework**

SSI agrees with the Discussion Paper's view that different international humanitarian crises and needs require distinct resettlement responses. With that in mind, Australia can strengthen its contribution by proactively adopting an Emergency Framework to provide a consistent, principled approach when responding to resettlement needs that arise from those crises.

Australia's experience with multiple recent emergency humanitarian crises arising from conflicts in Afghanistan, Ukraine, Gaza and the Sudan underscore the need for such a framework. While governments have made pragmatic responses, including this Australian Government's laudable decision to support family and community newcomers escaping these crises through other visa pathways, its overall response has nonetheless been ad-hoc, involving uneven and unpredictable adoption of measures. In some cases, such responses created significant gaps in critical support including access to health, education and employment, as outlined below:

#### **Case study – War in Sudan**

There are approximately 500 people in Australia who have fled the war in Sudan. There has been little knowledge or assessment of basic information from which to provide a considered response, such as where these people are currently staying and whether they are accessing services. While many of this cohort are in Australia on tourist visas, there is a duty of care to investigate and assess their capability to return, should the situation in Sudan improve.

#### **Case study – Gaza conflict**

Mariam and her family left all their possessions when fleeing the Gaza conflict, becoming wholly reliant on their Australian relatives when they arrived in Australia. Because she did not have access to Medicare while undergoing treatment for a stroke, Mariam's relatives were charged \$12,000 in hospital bills. Although the NSW Government eventually agreed to cover the medical costs of people fleeing Gaza in that jurisdiction, the family continues to receive

bills from the hospital, which is now threatening to take them to court if the bills are not paid. While Mariam and her family have since accessed separate accommodation from a charity, they only have three months remaining on their lease. After that, they do not know where they will go. Without work rights or to government benefits, the bills keep piling up.

Adopting an Emergency Humanitarian Crisis Settlement Framework will provide the structure across government and the settlement sector to enable a more proactive and coordinated response to international humanitarian crises, whether a particular cohort is granted temporary or permanent protection. The Australian Government considers the Humanitarian Settlement Program to be the frontline of settlement support and is therefore well-placed to be central to the implementation of the Crisis Settlement Framework in the new HISP model.

The following principles could underpin an Emergency Humanitarian Crisis Settlement Framework:

- **Client-centred and strengths-based**

Affected people seeking protection and the receiving community (including diaspora communities and humanitarian and settlement service organisations) should be involved in identifying needs and have opportunities to contribute to the emergency response.

- **Responses are fit for purpose**

Responses should be based on an assessment and planning for considerations and needs that arise in the pre-arrival, post-arrival and ongoing stay phase, when applicable.

- **Joint collaboration**

Government, diaspora community leaders and humanitarian and settlement service organisations should work together to:

- Understand the nature of the emergency humanitarian situation
- Assess the need
- Plan and coordinate the response, adapting as required when circumstances change

### **Case Study of an emergency response to arrivals from the conflict in Gaza**

Funded by donations and philanthropy, in response to the ongoing Gaza crisis, SSI has developed a Crisis Arrival Response Service (CARS), which is separate to our delivery of the HSP. CARS provides to people who have arrived in Australia fleeing Gaza, case management and community engagement, orientation, Opal Cards, transport supported by Multicultural Support Officers, linking and referrals to Status Resolution Support Services (if eligible) and supports provided by other organisations. This work has been done in collaboration with Australian Relief Organisation (ARO); Palestinian Christians in Australia (PCIA) and the Palestinian Australian and NZ Medical Association (PANZMA).

While SSI is providing CARS independently through donations, this arrangement cannot operate on a sustainable basis indefinitely. Other humanitarian organisations that are undertaking initiatives to support those in Australia who have fled Gaza have echoed this concern. The current challenges of SSI's support to CARS clients to access health, education and employment while they await decisions on temporary protection, further underscore the need for a coordinated sector wide approach, led by government, to respond to emergency humanitarian crises.

### **Sector resourcing to meet increased settlement need and demand**



An ongoing, well-resourced settlement services sector is essential to ensure humanitarian entrants' needs are met to enable the best possible settlement outcomes. SSI welcomes the commitment by the Minister for Finance, the Hon Katy Gallagher on 24 April 2024 that all government agencies are now mandated to pass on indexation to community service organisations' grants.<sup>5</sup> To ensure that Australia continues to sustainably meet its international commitments, certainty of base funding for all settlement service providers, including regular indexation that reflects the actual cost required to operate, must be provided.

Further highlighting the need to provide adequate funding for settlement services is the 2023-24 decision to remove the time limits for refugees and migrants in Australia to access Settlement Engagement and Transition Support. While SSI welcomed this decision, it did not include corresponding funding for services to meet that additional need and demand. This arrangement is not sustainable in the long term. Indexation of grant funding is an important initial step to address this shortfall.

#### **4. Scalable complementary pathways for humanitarian entrants require significant financial and in-kind contributions from the private and community sectors. How can the Australian Government best incentivise these contributions and provide the enabling environment for complementary pathways to grow?**

##### ***Recommendation 8:***

***Complementary pathways adopt the following core principles: A coherent national approach; Additionality; Durability; Supported settlement and a safety net; and Accessibility.***

#### **The role of complementary pathways**

Australia, the international community and the UNHCR are increasingly recognising the need to support a broader range of complementary pathways, in addition to existing programs, to respond to the growing number of refugees in need of resettlement. As part of the Global Compact on Refugees, members states of the General Assembly committed to increase the availability and predictability of complementary pathways for refugees and ensure that they are made available on a more systematic and sustainable basis with appropriate protection safeguards.<sup>6</sup> Australia has recently reaffirmed its commitment through pledges at the 2023 Global Refugee Forum.

Traditional migration pathways contain systematic barriers that prevent refugees from migrating for employment, educational or reunification purposes. Complementary pathways allow refugee resettlement programs to continue their focus on refugees with the greatest need and international partnerships. Long-term safety and needs of other refugee cohorts can be met through additional pathways, reducing pressure on the current system.

Pilot programs such as the Skilled Refugee Labour Agreement Pilot and the Community Refugee Integration and Settlement Pilot (CRISP) provide proof of concept that complementary pathways are viable and can address systemic barriers. Lessons from these pilots can inform the design of expanded complementary pathways for refugees going forward.<sup>7</sup>

Australia has several opportunities to improve, enable and incentivise contributions from private and community sectors to complementary pathways for humanitarian entrants.

#### **Improving complementary pathways**

SSI recommends that the Australian Government adopt the following core principles for complementary pathways, which have been developed by the Refugee Council of Australia and the sector:

- **A coherent national approach:** The Australian Government should articulate a coherent national framework for complementary pathways. This should provide a 'menu of options' for non-traditional actors to become involved in refugee protection as part of a whole-of-society approach to Australia's refugee response.<sup>8</sup>
- **Additionality:** Admission of refugees through complementary pathways should be additional to that facilitated through the Humanitarian Program.
- **Durability:** Complementary pathways for refugees need to be durable solutions that uphold humanitarian protection principles – i.e., provide a permanent visa or a clear pathway to permanency.
- **Supported settlement and a safety net:** Refugees arriving through complementary migration pathways will have similar experiences and needs to other refugees in navigating life in Australia. Ensuring adequate settlement support therefore requires removing the first year arrival restriction to access for those in complementary pathways. Complementary visa pathways must not diminish government responsibility to provide a safety net of support.
- **Accessibility:** The design of complementary pathways needs to address the barriers that impact on the capacity of refugees to access other migration pathways. This includes, for example: barriers in navigating application processes; prohibitively high costs associated with visa and migration-related fees; and inability to obtain required documentation.<sup>9</sup>

In SSI's experience complementary pathways can be expanded by applying the above principles, in the following manner:

- **Improvements to the Skilled Refugee Labour Agreement Pilot**

While the primary objective of skilled refugee complementary pathways is to provide durable resettlement solutions, they also offer several benefits to the receiving country. For Australia, addressing critical skills shortages, improving social outcomes for refugees and the community would come alongside raising greater public awareness of, and support for, complementary humanitarian pathways.

Access to skilled refugee pathways can be improved by:

- Expanding pilot quota numbers
- Waiving or reducing the visa processing fees
- Applying proportionate and responsive assessment requirements and timeframes. For example, it is not feasible to expect that employers undertake the process of a skilled refugee complementary pathway, if it involves meeting administration requirements that take a year to complete.

- **Improvements to the Community Support Program**

SSI, as an Approved Proposing Organisation, continues to recommend that there should be no visa application charges for community sponsorship. Community-based organisations and communities

themselves are responsible, make a considerable investment and carry out much of the intensive work in the CSP on a voluntary basis which can be undermined by high visa application charges. Costs for community sponsorship should be shared between community and government, as highlighted by the 2019 Shergold Review.

## **5. How can Australia best support the economic aspirations of humanitarian entrants to make strong contributions to Australia's economic prosperity?**

### ***Recommendation 9:***

***Ensure dedicated funding to enable economic participation is included as a core deliverable of the new Humanitarian Support Program service contracts.***

### ***Recommendation 10:***

***Expand humanitarian settlement to additional regional locations and a wider range of metropolitan areas, leveraging the lessons from the successful model led by SSI in Australia's newest regional settlement location, Armidale, NSW.***

## **Include dedicated funding within the HSP to support refugees' pathways to economic participation**

To strengthen the impact of humanitarian entrants' economic contribution, the Department should include economic participation pathways as a funded outcome during the initial 18 month period of the HSP. SSI's case management data reports that humanitarian entrants are consistently supported to successfully access employment opportunities. Providing formal, dedicated funding for these functions in HSP would consolidate humanitarian entrants' ability to attain stronger employment outcomes.

## **Expand humanitarian settlement to additional regional locations and a wider range of metropolitan areas**

In Australia, there is considerable impetus from government and regional communities for increased refugee settlement outside of our major cities. In recent years, the rate of settlement of refugees in regional areas has increased. While government policies have helped to increase initial settlement of refugees and migrants in regional areas, retention of newcomers remains a challenge.<sup>8</sup> Analysis by the Grattan Institute shows that when refugees and migrants settle in regional areas, they are more likely to move to major cities over time than people born in Australia.<sup>9</sup> This highlights the need for a greater focus on developing lasting connections that benefit newcomers and the regional communities where they settle.

Place-based community engagement initiatives provide a platform to recognise the shared aspirations of the local regional community and newcomers, while also creating a welcoming and socially inclusive environment. For example, SSI has found growing acceptance of refugee settlement in our joint research with the University of New England monitoring community attitudes towards refugee resettlement in Armidale, which is likely due to SSI's strong investment in community engagement when refugees were first settled there. These intentional strategies and coordination help break down language and cultural barriers by ensuring that people have the chance to get involved in community activities and make new connections.<sup>10</sup> SSI's delivery of self-funded community engagement initiatives, such as those in Armidale, foster the inclusion of newcomers in all aspects of social, economic and community life.

This essential aspect of SSI's work in successfully settling refugees in regional areas is not funded within current models for settlement services that are limited to addressing the immediate and ongoing needs of refugees. There is little scope for engaging and managing relationships with the local community, coordinating volunteers or developing dialogue between stakeholders. The Australian Government now has an opportunity to invest in this more holistic response while expanding to additional regional areas and a wider range of metropolitan Local Government Areas.

**Authorised by:** Yamamah Agha

**Contact:** Tri Nguyen, Social Policy Lead

[tringuyen@ssi.org.au](mailto:tringuyen@ssi.org.au)

**Date:** 7 June 2024

- 
- <sup>1</sup> Erickson, P. (2023). [Australian Labor Party National Platform](#).
- <sup>2</sup> UNHCR. (2024, 5 June). [UNHCR: 2025 global refugee resettlement needs spike to almost 3 million](#).
- <sup>3</sup> United States Department of State. (2023). [Proposed Refugee Admissions for Fiscal Year 2024](#).
- <sup>4</sup> Government of Canada. (2023). [CIMM – Immigration Levels Plan for 2024-2026 – November 07, 2023](#).
- <sup>5</sup> Gallagher, K. (MP). (2024, April 24). [Labor continues to deliver on its commitment to community sector organisations](#).
- <sup>6</sup> Wood, T. (2020). [The role of 'complementary pathways' in refugee protection](#). Kaldor Centre for Refugee Law. University of New South Wales.
- <sup>7</sup> Refugee Council of Australia. (2023). [Complementary pathways for refugees: policy principles](#).
- <sup>8</sup> Van Kooy, J. v., Wickes, R., & Ali, A. (2019). [Welcoming regions](#). Monash University; The Treasury and Department of Home Affairs. (2018).
- <sup>9</sup> Mackey, W., Coates, B. & Sherrell, H. (2022). [Migrants in the Australian workforce..](#) Grattan Institute.
- <sup>10</sup> Watt, S., McMahon, T. and Paolini, S. (2023). [From the 'resistant' to the 'champions': Community attitudes during the first four years of refugee settlement in Armidale, NSW](#). University of New England/SSI.