



National Ethnic Disability Alliance

Mobile: 0407 878 933

Local call: 1300 486 038

Post: PO Box 160, COBURG Victoria 3058

Email: office@neda.org.au

Website: www.neda.org.au

ABN: 13 087 510 232

Department of Families, Housing, Community Services and Indigenous Affairs
Services for People with Disability Program.
Canberra ACT 2600

Delivered to: saif@fahcsia.gov.au

Friday, 19 July 2011

NEDA Submission: SAIF Program Guidelines Exposure Draft

Dear FaHCSIA,

The National Ethnic Disability Alliance (NEDA) is the national peak organization representing the rights and interests of people from non-English speaking background (NESB) with disability, their families and carers throughout Australia. NEDA is funded by the Commonwealth Department of Families, Housing Community Services and Indigenous Affairs (FaHCSIA) to provide policy advice to the Australian Government and other agencies on national issues affecting people from NESB with disability, their families and carers.

NEDA actively promotes the equal participation of people from NESB with disability in all aspects of Australian society. It manages a range of projects relating to NESB and disability communities and works closely with its state and territory members to ensure that its policy advice reflects the lived experiences of people from NESB with disability. In states and territories where no NESB-disability advocacy agency exists NEDA undertakes development work to establish a structure that can support people from NESB with disability, their families and carers.

This submission is based on consolidated knowledge and research work conducted by NEDA over the past fifteen years. We believe that the points raised in this submission are critical for access and inclusion of people from NESB with disability.

We hope that you will give favourable attention to the recommendations.

If further information is required on this submission, please contact Sibylle Kaczorek on 0407 878 933 or email to office@neda.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sibylle Kaczorek', written in a cursive style.

Sibylle Kaczorek
Executive Officer

NEDA Submission

SAIF Program Guidelines Exposure Draft

1. Introduction

NEDA welcomes the opportunity to comment on the exposure draft of the Supported Accommodation Innovation Fund (SAIF) Program Guidelines.

Only a few migrants and refugees manage to gain entry into Australia due to an exclusive migration system, those who enter continue to face many barriers to inclusion. Those who acquire disability after gaining their residency in Australia and those who are born in Australia to parents born overseas are also excluded systemically.

There is very little study into the lives of people from NESB with disability. There is significant lack of data on people from NESB with disability. However, the under utilisation of services by people born in a non English speaking country with disability is widely reported through the Productivity Commission's annual Report on Government Services.

Based on the reporting of the Productivity Commission on Government Services¹ in 2008-2009 Australian residents and citizens from NESB with disability demonstrate a significantly lower uptake of services.

People born in a Non English Speaking Country were approximately 4 times less likely to receive accommodation support services than people born in English Speaking Countries.

1.1 About NEDA

The National Ethnic Disability Alliance (NEDA) is the national peak organisation representing the rights and interests of people from non-English speaking background (NESB) with disability, their families and carers throughout Australia. NEDA is funded by the Commonwealth Department of Families, Community Services and Indigenous Affairs (FACCSIA) to provide policy advice to the Australian Government and other agencies on national issues affecting people from NESB with disability, their families and carers.

NEDA actively promotes the equal participation of people from NESB with disability in all aspects of Australian society. It manages a range of projects relating to NESB and disability communities and works closely with its state and territory members to ensure that its policy advice reflects the lived experiences of people from NESB with disability.

In states and territories where no NESB disability advocacy agency exists NEDA undertakes development work to establish a structure that can support people from NESB with disability, their families and carers.

1.2 Defining NESB and Disability

NEDA uses the term Non English Speaking Background in preference to Culturally and Linguistically Diverse Background as those from an English speaking background are encompassed by the latter term and they are not part of NEDA's constituency. NEDA contends that coming from a linguistic and cultural background other than Anglo-Australian can be a great social barrier and a source of discrimination in Australia. The intention of using NESB is not to define people by what they are not but to highlight the inequity people experience due to linguistic and cultural differences.

NEDA also uses the term people from NESB with disability rather than people with disability from NESB as we consider cultural background (not disability) an appropriate means of developing social identity.

¹ <http://www.pc.gov.au/gsp/reports/rogs/2011>

NEDA Submission SAIF Program Guidelines Exposure Draft

NEDA maintains that disability is a social construct and arises when a society's infrastructure is not developed to ensure all individuals, regardless of capacity or impairment, can fully participate in society. Thus NEDA refers to people with disability rather than people with disabilities to underline that disability is not a characteristic of an individual but a consequence of a society designed (whether consciously or inadvertently) to exclude many of its citizens from equal participation.

However, with more inclusive program design and monitoring, NEDA believes that social inclusion for people from NESB with disability is possible.

NEDA estimates that people from NESB with disability comprise 1 in 20 Australians, or approximately 1 million people. This estimation was based on the assumption that one in every four Australians with disability is a person of either first or second generation NESB.

According to the broad finding from the Survey on Disability and Aged Care (SDAC), there are approximately 4 million people with disability in Australia.

2 Towards inclusion and equity of access for People from NESB with disability

The SAIF Program Guidelines Exposure Draft as they are currently proposed, reflect a continuation of exclusion for people from NESB with disability. While this may not be intentional, consecutive Government policy and program guidelines over the past have demonstrated beyond doubt that unless dedicated strategies are put in place people from NESB with disability will not achieve equity in access and outcomes. The above quoted statistic of 1 in 4 people from NESB receiving accommodation services has been the same for years.

There are two broad categories of barriers to access for people from NESB with disability. One of these foci is based on assumptions and experiences of the multicultural community which may result in a belief that service providers are not welcoming of the multicultural community. That they are full of prejudice against the community and therefore cultural practices including faith, obligations to family and food adherences are not possible to be observed. This may end in a reluctance of people from NESB with disability and their families approaching service providers altogether. The second broad focus is based on services provider practices. Essentially this requires service users to fit into a predetermined model of services provided. Often this results in communication strategies based on English rather than proactively offering a variety of community languages, facilities not including spaces to accommodate cultural practices and a lack of engagement with the multicultural community overall.

The current reference to people from NESB with disability in the SAIF Program Guidelines Exposure Draft is unsatisfactory (see 2.2 Participants/clients/recipients/target group).

'Projects which would provide services to Indigenous, Culturally and Linguistically Diverse or regional, rural and remote communities will be viewed favourably.'

At a minimum a percentage of projects and funds need to be earmarked for projects targeted at people from NESB with disability to address current under-utilisation rates.

Recommendation 1:

The SAIF Program Guidelines to earmark a minimum of 25% of projects and funds targeting the community of people from NESB with disability.

Of equal importance is the need to present options to potential applicants, allowing and encouraging them to think outside the realm of current practice.

Recommendation 2:

Under 2.4 Eligible and in-eligible activities, add:

- Purchase or modification of buildings that allow for spaces for cultural practice, including faith based practices and for extended family gatherings including options to cook food.

NEDA Submission SAIF Program Guidelines Exposure Draft

In line with the above point, there is a need to include a reporting requirement.

Recommendation 3:

Under 2.8 Activity performance and reporting – How much is being done?, add:

- The number of structural inclusions that target the NESB community with disability

Further, NEDA recommends that all applications ought to demonstrate some understanding of the multicultural communities in their respective project areas. The current wording does not require any research or communication with such communities.

Recommendation 4:

Under 3.2 Selection Criteria Point 5 Target Group, change or add:

- Describe the demography of the NESB community in your target area based on the Census and SDAC (Survey of Disability Ageing and Carers) data.
- Describe your communication strategy with the NESB community and identify your budget allocation supporting this strategy.

- All projects targeting people from NESB with disability must include at least two project partners from the NESB community supporting the project application. The applicants must demonstrate the level of engagement of the NESB project partners in the development, design and monitoring of the project.

Finally, the definition of *Innovation under SAIF* needs to support the general line of the inclusion principle as it has been suggested in the previous recommendations.

Recommendation 5:

Under 6 Definitions *Innovation under SAIF*, add:

- Has the potential to address the under-utilisation of disability accommodation services of people from NESB with disability.

5 Conclusion

The Supported Accommodation Innovation Fund Program Guidelines offer a significant opportunity to address under-utilisation of disability accommodation services by people from NESB with disability. This opportunity has the potential to go a long way towards improving the inclusion of people from NESB with disability.

NEDA is positive that with minor changes to the guidelines as proposed through the 5 recommendations stated in this submission, principles of the social inclusion agenda and the Australian multicultural policy can be embraced.