Ethnic Community
Services Co-operative
A voice for diversity and inclusion

(Formerly known as Ethnic Child Care, Family and Community Services Co-operative)

Feedback regarding the

Information, Linkages and Capacity Building Policy Framework

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1. PLEASE TELL US YOUR NAME AND ORGANISATION

Ethnic Community Services Co-operative (formerly known as Ethnic Child Care, Family and Community Services Co-operative Ltd) has 35 years of expertise working with culturally and linguistically diverse (CALD) communities and mainstream service providers across the disability, aged care and child care sectors.

ECSC's vision is that every Australian from a CALD background has the opportunity to participate fully in Australian society and receive services that are relevant and appropriate to their needs. Some of the many ways that ECSC continues to assist children, people with disability, the aged and disadvantaged groups from CALD backgrounds include:

- working with and **advocating for changes across all levels of government** and organisations that should be responding appropriately to these needs;
- **community development and capacity building** across ethnic communities so that they know their rights, have access to information and understand what they should expect from services;
- **linking** individuals to services;
- providing specific **programs and services** where needs are not being met by current services;
- **collaborating** with our members and other organisations;
- providing **specialist advice, information, training and resources** to services on cultural and linguistic diversity and how to be culturally and linguistically responsive; and
- valuing the knowledge, energy and passion of our workers and volunteers and providing a workplace where people can learn, innovate and grow.

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2. WHAT ARE THE MOST IMPORTANT ELEMENTS OF ILC?

- ECSC welcomes the ILC Policy Framework as a positive addition to the disability support system.
- ECSC views the **integrated approach** of ILC as one of its most important elements, in particular the inclusion of multiple facets of ILC-type supports (including information, linkages, outreaching, capacity building) in a holistic approach. This aligns with the way we work as an organisation; ECSC operates a suite of interrelated advocacy, information and referral, and capacity building programs that target CALD people with disability, CALD communities, and mainstream service providers.
- ECSC recognises that **ILC-type supports act as an essential "gateway" to the NDIS**, particularly for prospective CALD participants. We have first-hand appreciation of how important this work is in ensuring that CALD communities are informed of their rights and empowered to access relevant disability services.
- We also wish to emphasise the importance of strong ILC-type supports for **people with mild to moderate disabilities** who will not receive an individualised funded package, but currently rely upon funded services to enable social inclusion and wellbeing for themselves and their families and carers.

- ECSC welcomes the ILC Policy Framework's indication that certain ILC functions will be carried out by organisations external to the NDIA. In particular we wish to emphasise the **importance of community sector involvement** and **social support for CALD people with disabilities, their families and carers**. Supporting existing organisations with extensive networks and grassroots experience will assist the NDIA to avoid "re-inventing the wheel". ECSC would also like to highlight the importance of funding multi-service organisations, which are best-placed to facilitate the outreach of people who are not connected with the disability support system.

3. WHAT IS MISSING FROM THE ILC POLICY FRAMEWORK?

- ECSC would like to see an ILC Policy Framework with a **stronger focus on meeting the needs of our diverse community**, including services responsive to the needs of people from CALD backgrounds, and other special needs groups include remote and rural, Indigenous, women, etc.
- There is little mention of the **special needs of vulnerable groups** and how these will be integrated into the various ILC functions. In the example of CALD communities, culturally appropriate ILC-type supports are imperative if we are to improve the current low levels of NDIS participation amongst CALD communities.
- ECSC commends the scope of ILC Policy Framework the comprehensive 5 focus streams. However, ECSC believes the **example initiatives** under each stream should have **a stronger emphasis community development and outreach initiatives**. ECSC notes that for many of the 25% of people with disability from CALD backgrounds, "web-based supports" and "telephone information" will not suffice. Indeed, the Federation of Ethnic Communities Council of Australia (FECCA) found that CALD communities are more likely to obtain information through word of mouth from relatives and friends and other face-to-face methods via community centres, medical centres and migrant resource centres, rather than via the internet or telephone. (FECCA, Multicultural Access and Equity: Strengthening connections between communities and services, Canberra, 2013, pp. 20-25) This has also been our experience over many years of working with CALD clients.
- Furthermore, ECSC would like to emphasise that for these initiatives to have genuine impact, they must involve **ongoing programs rather than one-off projects**.
- ECSC believes that advocacy should be separate to the ILC Policy Framework, but we **urge the Commonwealth Government to develop a comprehensive advocacy policy framework through consultation**. ECSC also acknowledges that advocacy work needs to be carried out by organisations with existing community connections.

4. HOW WILL WE KNOW THE ILC STREAMS ARE MEETING THEIR OBJECTIVES/ VISION?

- ECSC acknowledges that quantitative data alone will not be an adequate measure of whether the ILC Policy Framework is meeting their objectives/vision. **Qualitative information must be captured through community consultations and feedback sessions**.
- ECSC is of the view that a **comprehensive monitoring and reporting system** is required, including both national surveys/polls and community level consultations.

- In order to measure whether the ILC Policy Framework is meeting its objectives/vision and acting as a safety net for people with disabilities, it is ECSC's view that it must measure **whether the objectives/vision are being met amongst CALD Communities and other specialised/vulnerable groups**. As part of a monitoring and reporting system, separate focus groups should be facilitated to receive feedback for example from specific CALD groups, age groups, or groups based on geographic location.
- It is important to ensure that consultation is undertaken in a **range of formats suitable to the needs of particular demographic groups**.
- **Community based organisations could be engaged to facilitate consultations**, utilising their existing networks and expertise in engaging particular communities. For example, ECSC was engaged by NSW Family and Community Services in 2012 to conduct consultations with particular language groups regarding the transition to person centred approaches in service provision.

5. WHAT WOULD BE THE IMPLEMENTATION CHALLENGES?

ECSC considers that some of the challenges facing the implementation of ILC include:

- **Cultural change within the disability sector and the general community towards a more inclusive approach towards people with a disability participating in 'mainstream' activities** – the required cultural shift may be pronounced in CALD communities where full participation and access could be hindered by the need to 'protect' the person with a disability. This is particularly challenging given that the NDIS has anecdotally been met with fear and confusion, possibly leading to the disproportionately low uptake amongst the CALD community to date. This could be mitigated by supporting outreach initiatives that provide information and advocacy to CALD communities in a culturally sensitive manner.
- **Structural changes within service providers as they adapt to provide ILC** – while there are already some experienced community-based services providing information, linkages and capacity building programs, some smaller providers may be forced to focus on particular services at the expense of others as organisations prioritise to meet changing demands. As a result, some highly specialised 'niche' services could be lost in the process if adequate funding is not available to support them, particularly those that target smaller community groups.
- **Service providers finding enough adequately skilled and passionate support workers to meet the demand** – for any provider, the key to delivering good service is having good front line staff. Organisations will need to have enough funding to retain and provide ongoing training to staff to maintain a high standard. Conversely, organisations must be cautious not to overburden staff as this can result in burn out and the loss of knowledge and expertise through staff turnover
- **Competition between service providers for both staff and clients potentially leading to negative outcomes for people with disabilities** – while competition will encourage innovation as service providers strive to stand out from one another, there are also potential challenges to overcome. For example, competing organisations may not be inclined to work collaboratively with an open exchange of information, which could impact on achieving the best possible outcomes for the person with a disability. There could also be a flow on

negative impact for the sector as a whole, by not openly sharing knowledge and expertise through forums, workshops and interagency meetings in order to keep a competitive advantage.

- While Local Area Coordination will go a long way in ensuring that ILC is focusing on building local communities, **the framework does not specifically mention how people who have specific needs around cultural and language barriers will be supported to be included in the ILC** – for example, would there be a number of specifically targeted CALD workers alongside Indigenous identified LACs and if so, what groups would be targeted? Would New and Emerging Communities also be targeted alongside more 'traditional' targeted communities such as Chinese, Arabic, Vietnamese, Italian, Greek, etc.
- Due to the ambitious scope of the ILC, **the allocated funding may be insufficient to properly fund the entire project meaning that certain compromises will need to be made**. It is a fear held by some that if this happens, CALD and Indigenous communities who may not fight for equal access to services may be the ones to miss out.

6. WHICH ASPECTS OF A PERSON'S LIFE DO YOU THINK ILC COULD HAVE THE GREATEST IMPACT ON?

ECSC welcomes the recognition that ILC supports can have a significant impact upon people's lives. We wish to emphasise that for many people with a disability and their families from CALD backgrounds, ILC supports will be fundamental to achieving basic aspects of a good life. ILC supports which focus on outreaching and responding to the needs of people with a disability and their families from CALD backgrounds, have the potential to significantly impact people's lives in a broad range of ways:

- **Promoting inclusive and accessible communities**: for example, our Multicultural Respite Service provides culturally appropriate support to access the community, for many people with mild-moderate disabilities who may not be eligible for IFPs.
- **Promoting and protecting rights**: for example, our Information and Advocacy program outreaches CALD communities to provide culturally sensitive information about the rights of people with a disability, in relevant community languages.
- **Enabling economic participation and security:** many people with a disability and their families from CALD backgrounds who access our services live near or below the poverty line. Support to access resources such as housing, income support payments and crisis assistance is often required to ensure basic human rights are met.
- **Supporting health and wellbeing:** services such as carers' groups and peer support groups which meet the needs of particular cultural and language groups can support positive health and wellbeing outcomes for people with a disability and their families from CALD backgrounds.
- **Advancing opportunities for learning and skills development**: through our extensive networks and outreach with CALD communities, we often identify gaps in knowledge and opportunities for skills development, such as computer classes or arts workshops for community members with a disability. Many of the people who could benefit from these opportunities may not be eligible for IFPs.

- **Facilitating personal and community support and inclusion**: Many CALD communities we have outreached are not aware of the supports and services that are available. Our targeted outreach and information can link them with personal and community supports appropriate to their language and culture, to facilitate social inclusion and personal well-being.
- **Building individual capacity, including strengthening informal support**: differing cultural understandings of disability and the caring role often mean that people with a disability from CALD backgrounds and their families have not accessed relevant services and may be isolated from their communities. Capacity building initiatives which are sensitive to these cultural understandings can build family resilience, and promote opportunities for people with a disability to participate in social and economic life.

7. WHAT ARE SOME OF THE PRINCIPLES THAT SHOULD GUIDE INVESTMENT ACROSS ILC STREAMS?

ECSC welcomes the broad range of supports included across the five ILC streams. We believe the following principles should guide investment across these streams:

- **Access and equity:** Australia has a diverse, multicultural, multilingual, multi-faith population and this needs to be reflected in policies, decision making, funding allocations and service delivery. ILC supports should be accessible and relevant to our diverse community, including services responsive to the needs of people from CALD backgrounds, and other special needs groups. The principles of access and equity should shape the delivery of all ILC supports, including through ensuring materials are available in a range of languages and formats; investing in outreach targeted to particular groups; and building the cultural competence of service providers across the sector.
- **Outreach and empowerment:** ILC supports should actively outreach people with a disability and their families who are not currently connected with disability and/or mainstream services. They should take an empowerment approach aimed at building the capacity of people with a disability and their families to have control over their own lives.
- **A holistic and multifaceted approach**: The diverse range of ILC supports described in the framework must be adequately funded in order to ensure the success of the NDIS. For example, individuals and families may require information, referral, linkages and capacity building in various combinations at different times. However, building individual capacity will be ineffective without also changing societal attitudes, cultures and systems to remove barriers to participation and inclusion for people with a disability.
- **The importance of community sector involvement across all Streams:** The grassroots knowledge and extensive networks of many community organisations make them a valuable asset in the provision of ILC supports, not only for providing individual referral, linkage and capacity building; but also in sharing their specific expertise to build the capacity of other organisations. For example, our organisation has recently worked with community housing providers to help them meet the customer service needs of people with disability and their carers from CALD backgrounds; and provided feedback on draft versions of publications from peak bodies to increase their accessibility for people with disability from CALD backgrounds.

8. HOW DO YOU SEE THE INTERFACE BETWEEN ILC FUNCTIONS AND ACTIVITIES AND THE INTERACTION WITH THE MAINSTREAM SERVICE SYSTEM? (I.E. HOUSING, EDUCATION, EMPLOYMENT, HEALTH, FAMILY, ACCESSIBILITY AND TRANSPORT)

ECSC welcomes the recognition that action is required to ensure that people with a disability have equitable access to mainstream services. We agree that all services should be accessible to people with a disability and responsive to their cultural, linguistic and other needs. We wish to emphasise that people with a disability from CALD backgrounds often face additional barriers to accessing mainstream services.

ECSC believes that **ILC supports** can play a role in promoting equitable access for all Australians through **investing in community organisations** to:

- **Raise awareness of the rights of people with a disability to access mainstream services**. For example, our Information and Advocacy service has worked with families and communities to raise awareness of the right of children with a disability to attend their local public school.
- **Provide information, referral and linkages for people with a disability and their families directly to mainstream services and resources**. For people who are significantly isolated from their communities, this may initially require intensive assistance, but the need for assistance then reduces over time. For example, we recently provided intensive support to a family to access social housing, which has resulted in increased social inclusion, positive health outcomes and improved mental health for the family, and is likely to lead to increased economic participation over time.
- **Build the capacity of mainstream services to respond to the needs of people with a disability and people from CALD backgrounds**. For example, providing training to management and frontline staff about disability and cultural competency, to ensure that both policy and day-to-day practices are accessible to people with a disability.
- **Facilitate networking and linkage opportunities between disability service providers, grassroots community organisations and mainstream services**. Funding could be provided directly to community organisations to host forums and interagency networks, in order to utilise and build upon their existing connections. For example, ECSC currently convenes the Multicultural Disability Interagency, bringing together more than 80 service providers across the disability and multicultural sectors, to build understanding and share best practice in promoting inclusion of people with a disability from CALD backgrounds.
- **Provide information to mainstream organisations about disability services** to enable referral to disability-specific supports when appropriate. Many people with disability from CALD backgrounds are isolated from the disability support system. Building the knowledge of mainstream providers about how to access disability support services would lead to improved outcomes for many people who have never accessed supports such as therapy, personal care, transport or specialised equipment.

Although not necessarily part of the ILC Framework, we also urge the NDIA to:

- **Implement a Cultural Diversity Competency Framework across disability and mainstream services**, which informs all work practices. For example, the Framework being developed in NSW through NSW Family and Community Services could be championed by the NDIA. This would build the capacity of mainstream organisations to be responsive to the individual needs of people with a disability within their cultural context, and address some of the additional barriers experienced by people with a disability from CALD backgrounds.
- **Urgently consult with people with a disability and their families, service providers and advocacy services to develop a policy framework for disability advocacy.** The adequate funding of culturally appropriate advocacy services is also crucial to people with a disability achieving equitable access to mainstream services and the community, in order to address specific barriers which may arise for individuals as well as address systemic barriers to access. While ECSC recognises that advocacy may be best funded separately to ILC supports, we urge the Commonwealth Government to consult with all stakeholders in developing a comprehensive framework for disability advocacy.

9. OTHER COMMENTS (OPTIONAL)

ECSC thanks the NDIA for the opportunity to provide feedback on this important policy framework. In addition to our comments above, we also wish to highlight some of the **specific barriers experienced by people with a disability from CALD backgrounds and their families**, which we have identified through our consultation and grassroots work with CALD communities over many years. These barriers to accessing services and participating in the community include:

- **Lack of awareness of the NDIS and a lack of preparedness to engage with person centred services**. Many people in CALD communities we have encountered through our outreach work over the past year have not heard of the NDIS at all. Many have also found it extremely challenging to shift from the welfare model of disability service provision with which they are familiar, to begin thinking of 'goals' and 'aspirations'.
- **Differing understandings of disability in different cultures and languages**. For example, in some languages, the term 'disability' does not include mental or intellectual disability, and thus many people may not be aware that they are eligible for supports. Similarly, differing cultural understandings of caring roles and responsibilities of family members means that often carers are not aware of the supports they are eligible to receive.
- **Barriers to accessing government-provided services**. For example, many people from refugee backgrounds may have a fear of authorities due to experiences of persecution. Other groups may expect the government to provide services in a particular way and are not prepared for the models of service provision in the Australian system. Community organisations with expertise in working with these groups can act as 'gateways' for access to government-provided services.
- **Unwillingness to ask for services or support from outside the family**. This can be due to a range of cultural and personal reasons, including diverse understandings of the caring role; services being unavailable in a country of origin; or stigma around disability which can result in a fear of others in the community finding out about a request for a disability support service.

Overcoming these and other barriers requires targeted and culturally appropriate outreach and community education. Investment in community organisations with expertise in working with diverse communities around these issues is essential to ensure that people with a disability from CALD backgrounds have access to the relevant supports they require to live a good life and participate in their communities. In the current context, adequate funding for this work is urgently needed to ensure that these communities are not 'left behind' as the NDIS is rolled out. We urge the NDIA to consider these issues as the ILC Policy Framework is finalised.