

ANAO Audit of the Settlement Engagement and Transition Support Program

The Social Policy Group Settlement Peak Body and Sector Submission

December 2025

The Social Policy Group: Settlement Peak Body and SETS Community of Practice

The Social Policy Group (SPG) welcomes the opportunity to contribute to the Australian National Audit Office's performance audit of the Settlement Engagement and Transition Support Program (SETS). SPG is a funded national settlement peak body, which works directly with organisations that deliver SETS and with the Australian Government. As a part of its role, SPG facilitates the SETS Community of Practice (SETSCoP), which brings together SETS providers to share experiences, knowledge, best practice, and solutions to shared settlement issues. This submission draws on extensive engagement with SETS service-delivery organisations across Australia through the SETSCoP, as well as dedicated consultations, a sector survey, and focus groups convened specifically to inform this submission.

SPG recognises that the audit involves the independent and objective assessment of the administration of the SETS Program, with a focus on an assessment of the efficient and effective implementation of the program and achievements of intended benefits. This submission is designed to offer insights into the administration of the SETS program from the perspective of SPG as a peak body, findings from over five years of the SETSCoP, and the perspective of service delivery organisations (SETS providers).

This submission focuses on the program settings and recommendations for the current SETS grant period commenced on 1 July 2024 and is scheduled to conclude on 30 June 2027. SPG found in the course of engagement that there is wide agreement to this current grant being an improvement in settings and administrative arrangements to the previous SETS grant (1 January 2019 until 30 June 2024).

Submission Development

SPG collated insights to inform this submission including:

- An anonymous survey of SETS providers, with 48 respondents, including a mixture of multiple choice and open-ended questions. Questions were aligned to the terms of reference of the audit and captured provider views on:
 - The appropriateness of grant agreements;
 - Active management of grant agreements;
 - Whether services were being provided to humanitarian entrants and vulnerable migrants; and
 - Cross-cutting questions.
- Two dedicated focus group discussions:
 - Six SETS providers on 1/12/25; and
 - Five SETS providers on 4/12/25.
- Two dedicated intensive consultations with representatives from one respective SETS organisation in each session to test findings and observations.
- Discussions in the SETSCoP in-person state and territory meetings (10 in-person meetings each year) and national subgroup meetings (30 meetings each year).
- Engagements with settlement stakeholders, including SETS providers, through the course of our SPG work as a settlement peak body and facilitator of the SETSCoP.

Findings

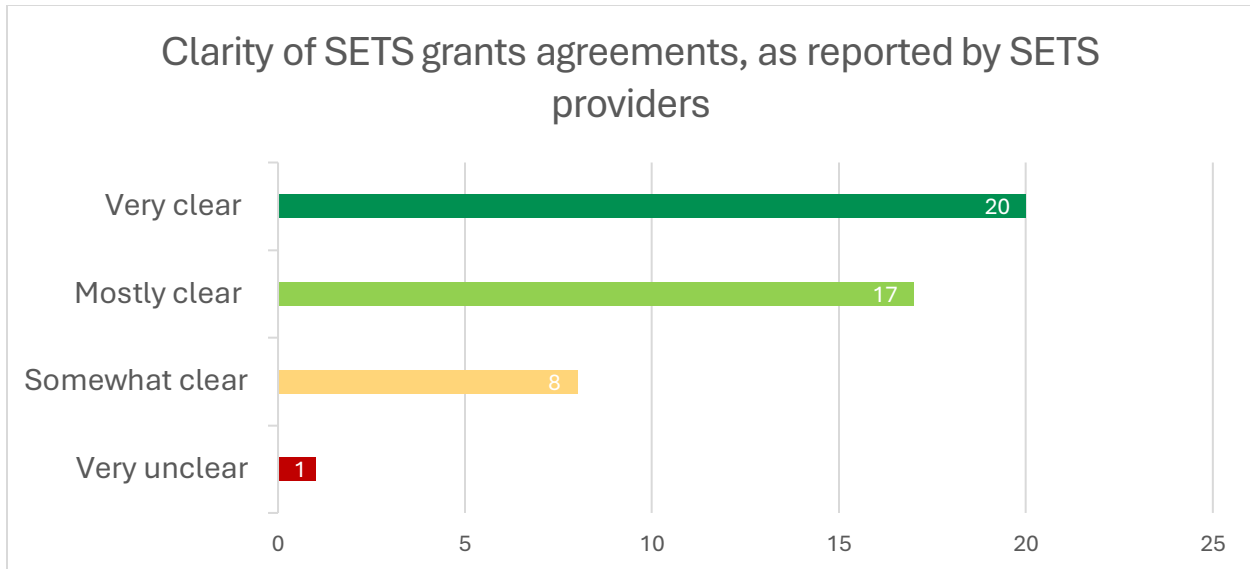
1. Are appropriate grant agreements in place?

1.1. Grant clarity and flexibility

'I believe that generally the grant agreement provides us with the ability to deliver the program.'

SETS provider

SETS providers noted that the current SETS grant agreements (2024 – 2027) provided much better clarity than the previous SETS grant agreements (2019 – 2024). The scope, roles, and responsibilities were more clearly outlined. At the same time, the grant agreements offered flexibility for providers to tailor their services to the humanitarian entrant and vulnerable migrant clients and communities that they work with.



SETS provider survey responses, December 2025. Question: How clearly do your SETS grant agreements outline roles, responsibilities, deliverables and expectations?

Appropriate flexibility in the grant agreements

A plurality SETS providers commended the flexibility of SETS grant agreements, which allow SETS providers to deliver settlement services that are locally tailored, responsive, and able to meet changing community needs. A SETS provider summarised: *‘The SETS program is a great program and is essential to supporting migrants in our region. We particularly appreciate the flexibility in the settlement support that we can provide because it is adaptable to different needs and situations.’* Another positive is that SETS providers can usually change their Activity Work Plans (AWPs) based on changing context and conditions.

One potential limit in agreement flexibility is that some SETS providers find levels of need and clients requiring settlement support outside of their designated geographic area. While there are often resource constraints, agreements could be more responsive if adaptations were made over the grant duration, especially considering the demographic changes that can occur across a multi-year period. A provider outlined: *‘We find the SETS agreement quite good and they allow us sufficient flexibility to deliver necessary services and support for our communities. Increased flexibility in service delivery locations would enable us to work more broadly to meet community need.’*

Further clarity of expectations and deliverables, while maintaining flexibility

Some SETS providers requested further clarification of expectations for delivery in the grant agreement, subsequent activity work plan report, and some of the key terms. This was especially the case for new SETS providers who highlighted that further clarity would support their program development and delivery. Clarity could also be further enhanced not just within the written grant agreements themselves, but also through more active grant management at the beginning of the

grant program. A provider noted: *‘The agreement would benefit of having further discussions and conversations with the contract manager to clarify questions, etc’.*

The sector would value further co-design of the grant agreements, including developing a program logic, theory of change, and/or logical framework for alignment across the SETS program, especially considering the number of delivery organisations within the program. *‘The expectations, milestones, and reporting requirements are clearly articulated, and we value the flexibility of the agreement, which allows us to tailor services according to client needs. However, some deliverables are not fully aligned with DEX reporting requirements. As a result, additional staff training is required for providers to ensure accurate and consistent reporting across both frameworks.’*

More clarity needed regarding deeds of variation (supplementary funding)

Overall, supplementary funding components to the SETS programs through deeds of variation have been very welcome and important. This includes supplementary funding for domestic and family violence (DFV), the Pacific Engagement Visa (PEV), and service for Palestinian, Israeli, and Ukrainian cohorts under SETS. However, the language in the deeds of variation have been much less clear than the SETS agreements. The lack of detail has caused confusion around expectations and deliverables. SPG understands that supplementary components are almost always responding to fast-changing situations, for example, the PEV changes where there are inherent challenges in projecting where people may settle and over what timeframes. This responsiveness is commendable to support the SETS program intentions and overall performance of the grant. With this being acknowledged, further clarity of expectations of what should be implemented under the deeds of variation would support SETS providers in their planning and delivery, noting this can be amended as necessary, and while still recognising the importance of flexibility for providers to respond in their local context and organisational settings.

Changes were also made to the original grant agreements during variations. SETS providers noted that they were not always aware of the exact changes within the documents. It was recommended to highlight specific changes from the prior grant agreement, and/or to explicitly specify all changes in accompanying correspondence, alongside discussions to clarify objectives and intent to ensure providers are fully aware of the changes in the agreements.

Recognising children and youth as distinct cohorts, identifying children and youth as priority groups

A number of providers expressed the need for refugee and migrant children, and refugee and migrant youth, to be recognised and treated as unique settlement cohorts within the SETS program. Providers expressed concern for the unique vulnerabilities of these cohorts, but also stressed the unique strengths and opportunities possessed by children and youth. These sentiments align with Australia’s world-leading National Youth Settlement Framework (NYSF), which recognises youth as a distinct cohort, rather than a subgroup of families and adults. For

young refugees and migrants, there is a need for youth-only spaces and youth-specific activities. SETS providers who serve large youth cohorts found this to be particularly important.

SETS-adjacent, youth-specific settlement programs such as the Youth Transitions Support (YTS) program exist in Victoria, Queensland and New South Wales, but are limited in other States and Territories. It would be beneficial to add a definition and an outline of both cohorts to grant agreements. Both cohorts should also be added to the list of priority groups within grant agreements.

1.2. Grant duration

The SETS program duration of three years is short for a program of its complexity. The short grant agreements make long-term planning, staff retention, workforce development, and sustained community capacity building (CCB) all challenging.

With impending scheduled conclusions to the SETS grant program occurring on a regular shortened basis, SETS service providers struggle to offer long-term contracts to SETS workers beyond the grant duration. This can lead to experienced, trained and capable workers looking for employment stability elsewhere, which presents a significant drain on retention and loss of skills for organisations as well as the wider settlement sector.

Another specific component example is that of new SETS CCB projects, where it can take 12-24 months to establish trusting and productive relationships with community (such as community organisations and community leaders). The scheduled conclusion of the program on the short three-year timeframe curtails longer-term community planning and relationship-building.

One caveat to longer grant durations would be to still allow a diversity of organisations to enter the program. The diversity of SETS is a key strength: Providers can vary from large, established migrant resource centres to newer refugee-led and ethno-specific organisations. Consideration should be given to how longer-term grants can hold an equity lens, including the possibility for entrance for organisations and an assessment that does not preclude newer or smaller organisations from taking part in longer-term grants.

‘Extend funding cycles to five years - Current short-term grant cycles do not match the settlement period needed for clients. A five-year cycle would allow providers to focus on service delivery and continuous improvement rather than repeated grant applications. Reducing unnecessary administrative demands, aligning support activities with core service delivery, and providing sufficient resources and longer-term funding will significantly enhance the effectiveness, sustainability, and impact of the SETS program.’ - SETS provider

Overall, longer-term grant agreements, with durations of between five and seven years, would support performance, effective implementation, and achievement of intended benefits of the SETS program.

1.3. Grant funding

The 2024-2027 SETS program has the highest amount of funding provided for the program since its inception. However, SETS providers are still facing higher demand than resourcing allows. SETS providers have reported being understaffed and overworked due to limited funding relative to client and community needs.

Challenges in resourcing administrative burden and coordination

Funding should be further aligned to consider administrative burden (for example, of DEX reporting), workforce development needs, and the staffing requirements needed for the coordination, collaboration, advocacy, adjacent service capacity building, and collective action crucial in addressing systemic issues, all of which are central to program performance and outcomes.

An option to amend grant agreements to reflect changing client demand

Demand for settlement services can rapidly grow within service delivery areas. The ability for providers to access complementary or additional funding during contract periods, in order to respond to major increases in demand in these instances, would improve settlement outcomes.

Funding recognition of the growing complexity and needs in settlement

The SETS program has been described as a ‘light-touch’ program that is increasingly under pressure with the increasing need and demand for responsive services from humanitarian entrants and vulnerable migrants, and expectations for high performance. A number of examples can be pointed to regarding the higher burdens being placed on SETS providers that are challenging to meet without commensurate funding increases.

- There is a high emphasis on economic participation, both from the Australian Government and from SETS clients themselves. However, employment specialists and/or the ability for SETS workers to make meaningful connections with employers, which would lead to more effective work and improved employment outcomes, are both resource-intensive and difficult to fund under the existing model.
- SETS providers are increasingly working with clients with disabilities or who are carers, which is resource-intensive and would benefit from dedicated training and capacity building outside the scope of current SETS funding.
- Funding limitations risk precluding more resource-intensive activities that may be important for specific clients, for example driving lessons for young people or women.

- The DFV supplementary funding has been crucial in supporting humanitarian entrants and vulnerable migrants experiencing DFV. However, as SETS capacity increases, more clients are disclosing DFV, and SETS providers do not have the funding available to meet this increase demand, especially with the challenges in referrals to ‘mainstream’ DFV services.
- With sharp cost-of-living increases across Australia, an increasing number of clients are turning to SETS providers in crisis situations. SETS providers have discussed how even a small brokerage funding model under SETS could support clients in these situations or be of benefit to clients with immediate material settlement needs that could help preclude crises further down the line.

1.4. Regional grant funding arrangements

A high number of SETS grant arrangements are in place for regional organisations, reflecting the importance of refugee and migrant settlement in regional and rural areas across Australia. Program delivery and outcomes would be improved by more appropriate regional SETS arrangements. Regional settlement requires a differentiated funding model and approach to adequately support service delivery, with regional SETS providers facing additional challenges in settlement service delivery.

In many regional and remote areas, SETS providers operate with few or no alternative settlement services to refer clients to. Regional locations also have fewer mainstream services which should be delivered in combination with SETS. Regional locations also have few or no specialist services, such as DFV specialist organisations, for SETS providers to refer clients to. The adjacent services that are available are more likely to lack cultural-responsiveness and to struggle to meet the needs of humanitarian entrants and vulnerable migrants, placing additional demands on SETS providers. Many providers stressed the need for grant agreements to account for these gaps, the higher caseload complexity that results, and the additional workload involved. A survey respondent called for:

Regional providers often cover large geographic areas, which usually requires inherent travel time for outreach or to meet clients, and the associated resourcing needs for staff hours and travel costs. An example illustration: While a large metropolitan provider might be able to service hundreds of clients per week in inner-western Sydney or south-eastern Melbourne who are able to reach the SETS provider offices or group sessions, a regional provider in regional New South Wales might cover five different towns that each require over a few hours roundtrip to reach, in order to meet a smaller number of clients. One SETS provider covering both regional and metropolitan locations illustrated this with the example that in their urban location, they can accompany a client to a Services Australia meeting or employment specialists meeting by crossing the road from their offices, while doing the same for a client in a small regional town might involve an hour of extra driving, multiplied over a number of clients.

This means that many regional SETS organisations face increased financial precarity in their service delivery and that SETS arrangements are less appropriate relative to urban SETS organisations.

2. Has there been active management of grant agreements?

2.1. Communication with program administrators

Overall, the active management of grant agreements has not been consistent or equal across organisations. Unlike the wider consensus on the appropriateness of the grant agreements, feedback regarding active grant management has been more mixed. A large majority of SETS providers have found Data Exchange (DEX) reporting to have limitations in its applicability to reporting on settlement outcomes, especially for CCB. Organisations also have difficulties in using data they input into DEX for understanding their own organisational delivery and performance, making it feel like DEX is a ‘one-way street’. There are largely positive sentiments toward the policy holders (the Department of Home Affairs), and reports that funding arrangement management (Community Grants Hub) communication has markedly improved over time - especially since the start of the new SETS program in July 2024. However, the quality of communications and feedback varies widely amongst different SETS providers. While many organisations have strong communications with program administrators, others note that communication is much sparser and that they experience gaps in feedback.

Communications with Community Grants Hub regarding funding arrangements

The sector has experienced positive developments over recent months regarding the active management of the funding arrangements. A number of SETS providers expressed appreciation for an improvement in access and timely responses from funding arrangement managers (FAMs), relative to previous periods. Over half of all survey respondents rated the quality and consistency of their communications with FAMs as ‘excellent’ or ‘good’. Similarly, more than half of all survey respondents selected ‘always’ or ‘often’ when asked if their grant managers offered helpful guidance and support. Most respondents felt that changes to the SETS program were well communicated by grant managers.

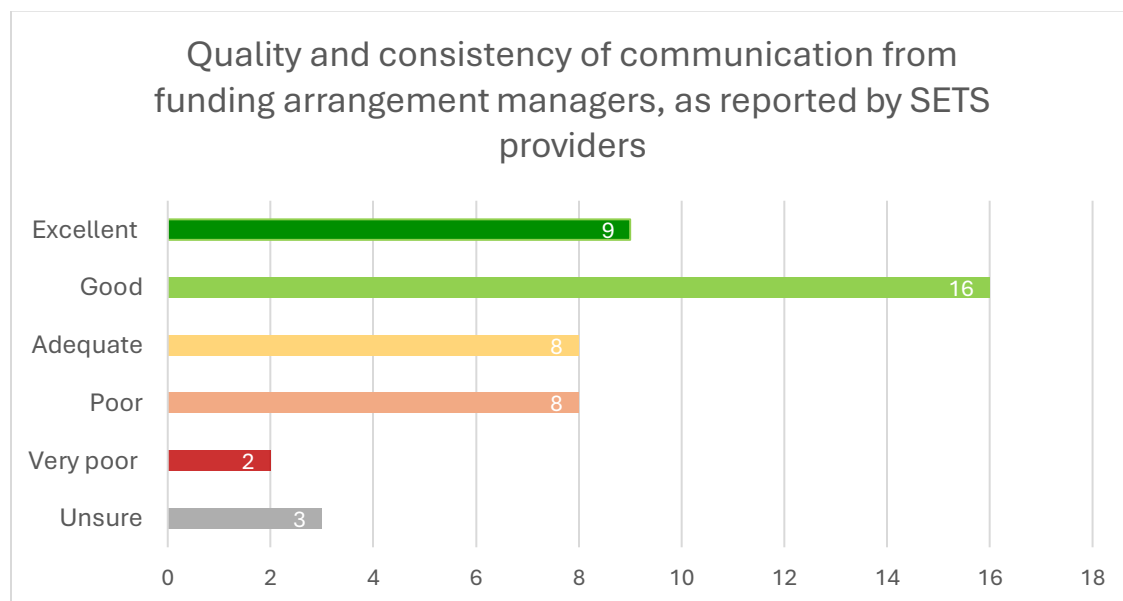
However, questions which considered the active management of grant agreements also received a number of responses from SETS providers citing only adequate or poor consistency and effectiveness of communications, indicating wide variability in the experience of active management for different providers.

Since funding arrangement management moved to South Australia, some SETS providers noted that they had never met their FAMs face-to-face after more than five years working on the SETS program, and communications usually consisted of phone meetings during reporting periods. SETS providers believe this can make it hard for program administrators to understand SETS delivery on the ground and to provide appropriate contextual understanding to AWP and DEX reporting.

Providers expressed the need to move beyond written communication, to increased on-site communication and/or more standardised video calls. This would allow for more robust and meaningful discussions in the face of each provider’s unique operating context. Increased in-person meetings and site visits would also be valuable to counter the difficulties presented to some SETS providers due to a perceived turnover of FAMs.

Providers expressed less concern with frequency of communication than with the mode of communication, the responsiveness of grant managers when issues arose, and the quality of communication.

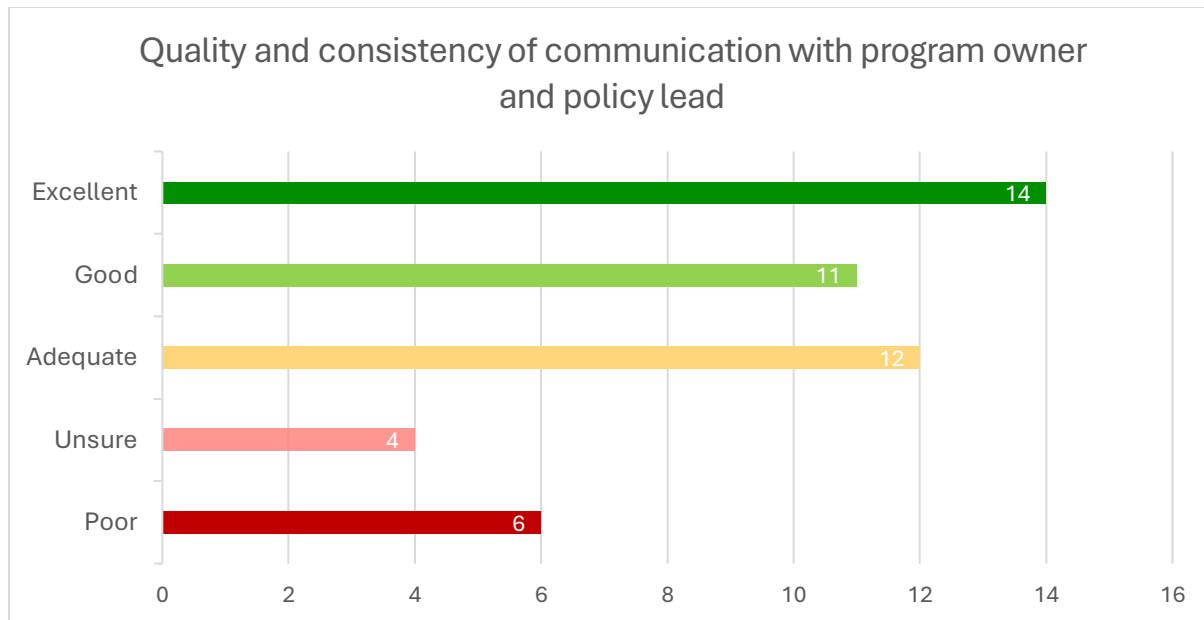
‘We would appreciate more engagement with grant managers, as we can see the benefit this brings compared to the level of engagement with other funding from other departments. This will foster stronger partnerships and increase the department’s understanding of clients’ needs, complexity and outcomes, as not everything can be explained in a report.’



SETS provider survey responses, December 2025. Question: How would you rate the quality and consistency of communication with the Funding Arrangement Manager(s)?

Communication with program owner and policy lead, the Department of Home Affairs

Quality and consistency of communication with the program owner and policy lead, the Department of Home Affairs, was similarly variable across different providers. Overall, SETS providers were positive regarding the relationship between SETS providers and the Department of Home Affairs, with providers describing the current relationship as positive and respectful.



SETS provider survey responses, December 2025. Question: How would you rate the quality and consistency of communication with the program owner and policy lead (Office for Multicultural Affairs, Department of Home Affairs)?

While many SETS providers understood the distinction between the FAMs in the Community Grants Hub under the Department of Social Services, vis-a-vis the program policy holders of the Office for Multicultural Affairs, the Department of Home Affairs, some SETS providers did not fully understand the administration arrangements. This speaks to some of the issues around knowing who to seek feedback from, for example, whether it was a ‘technical’ or ‘policy’ issue regarding DEX reporting, or how to seek clarity or who to speak to regarding eligibility issues or program implementation challenges. SETS providers would benefit from a more joined-up approach between the Community Grants Hub and the Department of Home Affairs, so that when complex questions are asked, there are less referrals to alternate administrators and more constructive discussions to support program implementation.

A desire for more performance feedback

SETS providers face challenges in understanding their performance in delivery of SETS services. Feedback on AWP and DEX reports is usually insufficient to understand ‘*how we are performing and how we can keep improving*’, as a SETS provider expressed in a consultation. While wanting to avoid even greater administrative burden, SETS providers value being able to engage productively with both Community Grants Hub and the Department of Home Affairs regarding implementation of their settlement programs, issues they are seeing on the ground, challenges, and operational issues around eligibility and reporting. There was positive feedback regarding communications with the Settlement Network Office, Settlement Grants visits, and face-to-face or effective phone and video call meetings with Community Grants Hub in this regard, but there is a desire for more consistency across different organisations and over time.

2.2. Data Exchange Reporting (DEX) system

DEX reporting limitations and challenges in conveying outcomes

The settlement sector has long found limitation with DEX reporting. Standard Client/Community Outcomes Reporting (SCORE) struggles to capture the nuances of client and community change, the settlement journey, and outcomes over time. Humanitarian entrants and vulnerable migrants will often engage with SETS providers across multiple domains that usually require discreet inputs in DEX (e.g. engage with a settlement provider for employment support but with casework and group sessions covering family wellbeing, service navigation, and community connection), and have settlement journeys that are not linear in either reporting periods or a 1-5 SCORE that increases over time. Further, DEX reporting does not fully align with AWP deliverables. SETS providers continually encounter a number of additional technical and policy issues, including people with only one given name, and when SETS providers do not receive timely feedback or responses, much administrative burden and time can be taken up in trying to either understand or rectify issues for DEX reporting. Finally, DEX struggles to convey the important work in CCB. Providers are often frustrated given DEX is one of the major requirements and ways to report on CCB activities alongside qualitative AWP reporting, but DEX often fails to capture the full breadth and depth of CCB activities including time-intensive fostering of partnerships, working closely with community leaders on governance issues, and training on DFV responsiveness skills.

Lack of training and ‘one-way’ data

There has reportedly been staffing changes in the DEX team at the Department of Social Services that have precluded ongoing training for SETS providers on DEX reporting. While there is DEX Guidance as well as dedicated SETSCoP meetings and sessions on DEX, many SETS staff require time and training to be able to conduct DEX reporting effectively, especially given data quality is crucial for the government.

There is also a widespread perception that SETS providers spend a lot of time and effort on DEX reporting, but do not see much data in return. Reports or data pulls that SETS providers have done usually fail to support organisations in their own understanding of their programs, organisational reports, assessment of organisational program performance, and support in SETS program planning. This may be linked to the lack of training, with a very small amount of providers reporting it is possible to use some of the data which is reported into DEX for these purposes, but it requires specialist understanding of how to navigate the DEX platform.

DEX reporting is particularly burdensome for group work and events

Group work and community events are crucial within the SETS program. However, the current DEX settings are highly burdensome for reporting group activities, with major challenges in collecting data from a high number of participants. In addition, due to privacy concerns, many participants do not feel comfortable providing their personal details to SETS providers; as a result, the reach of services provided is either going underreported, or flagged for missing data within DEX reports.

“Another challenge is collecting demographic information from community leaders in settings such as multicultural meetings, which are generally held at third-party venues. The same difficulty applies at group sessions and community events. We have observed that many participants are increasingly reluctant to provide extended demographic details. They prefer to share their age rather than their date of birth, citing concerns about rising incidents of identity theft and scam.”

SPG recommends that the DEX requirements for group activities are changed to allow SETS providers to focus on delivery, while still measuring the impact services are having through high-quality data. Requirements can align with changes advised by DSS to make DEX reporting more simple, including through a census-style approach twice per year (once every six months).

Challenges in rectifying issues

DEX reporting is limited and is not always able to convey nuanced instances where services have been successfully delivered. One provider explained that they failed a KPI due to an activity not being logged over a specific period, which corresponded with the CCB worker’s leave period. The worker and organisation had, however, performed all required activities during their wider AWP period. There was no opportunity to explain and rectify the incorrectly classified ‘failure’. Providers are not given the opportunity to rectify DEX reporting input errors when these are identified by their grant managers. One provider gave the example of an instance where they forgot to add their referral sources. They were not given an opportunity to rectify this error.

3. Are services being provided to humanitarian entrants and vulnerable migrants?

3.1. Removal of five-year eligibility limit: A valued and important change

The removal of the limit of service provision to those who have been in Australia for less than five years has been a significant change to improve service provision for humanitarian entrants and vulnerable migrants. The extension of the eligibility criteria, which came into effect on 26 October 2023, has allowed the SETS program to support refugees and vulnerable migrants who need tailored support beyond the five-year mark.

One caveat is that removing the five-year limit, without commensurate increases in funding to meet the much higher number of eligible humanitarian entrants and vulnerable migrants, has meant that SETS providers need to triage their clients. SETS providers may need to find other means to service clients in need, and clients may face longer waiting periods before they can get support.

Overall, this change has been an important step towards effectively supporting humanitarian entrants and vulnerable migrants. This is particularly so for refugee and migrant women, who often support their families and partners in the initial years after arrival, before seeking their own

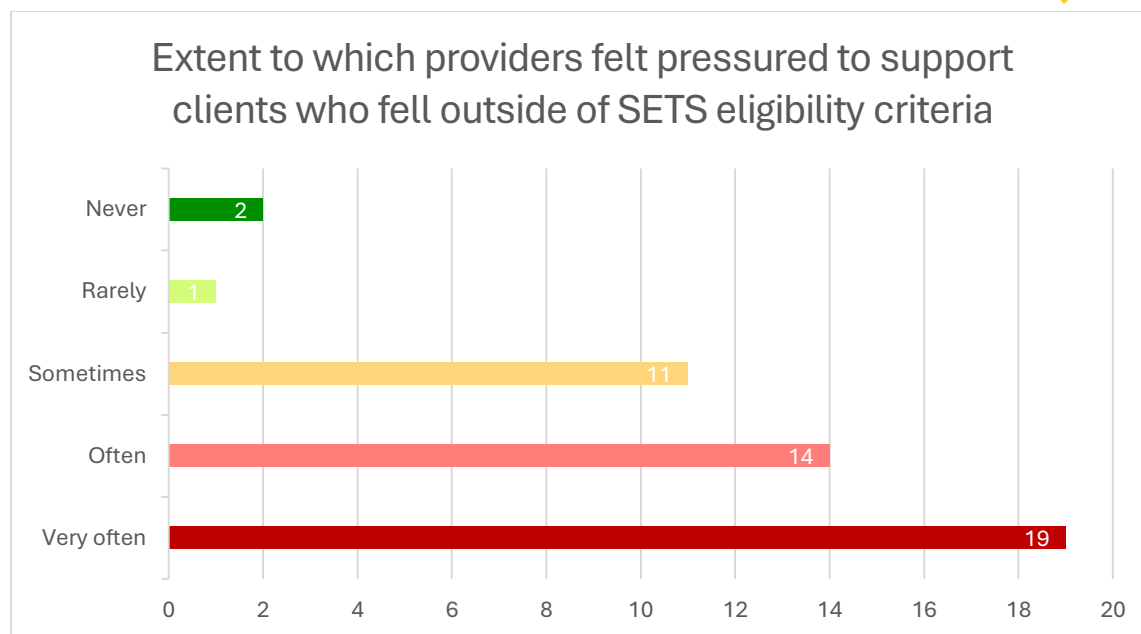
settlement support. Refugee and migrant women are also at much higher risk of experiencing DFV during their settlement journeys. When the five-year limit was in place, refugee and migrant women were disproportionately harmed by being unable to access SETS services after their five-year mark.

3.2. Challenges in servicing vulnerable migrants who are SETS eligible dependent visa holders in rural and regional areas

Unlike humanitarian entrants, dependent visa holders who are eligible for SETS are not placed on a formal pathway to SETS from the Humanitarian Settlement Program (HSP). For those who are also living in rural and regional areas, they are also geographically isolated. This cohort is often unaware of the SETS program and their eligibility for it. This cohort is similarly invisible to SETS providers. SETS providers often have full caseloads and can lack the requisite resourcing for dedicated outreach to ensure that services are being made available to this cohort of vulnerable migrants. They therefore fall through the gaps and only become visible to SETS providers at crisis points (when emergency services contact the SETS provider on behalf of the refugee or migrant, for example, when a family are facing housing precarity and the housing services seek culturally responsive support from SETS providers).

3.3. Pressure to service ineligible humanitarian entrants and vulnerable migrants

Providers have expressed appreciation for the clarity provided to them regarding SETS client eligibility. However, while eligibility criteria are clearly defined, providers experience frequent pressure to support clients who fall outside eligibility, who struggle to access the few or no service alternatives.



SETS provider survey responses, December 2025. Question: Have you felt pressure to support clients outside SETS eligibility due to system gaps (e.g., DV, youth, digital literacy, temporary visa cohorts)?

Ineligibility of humanitarian entrants and vulnerable migrants who are Australian citizens

Australian citizens are ineligible for SETS services. Many humanitarian entrants seek citizenship once they are eligible, early in their settlement journeys, as it offers a crucial sense of belonging and sense security. However, many new citizens face major challenges in accessing ‘mainstream’ services, with reports of circular referrals where employment service providers or DFV specialist services attempt to refer recent Australian citizens who arrived as humanitarian entrants back to SETS providers, lacking the requisite capacity to provide support. Children born in Australia to a refugee parent, who become citizens are also therefore ineligible for settlement services. Similarly to the removal of the five-year limit, some SETS providers are more trepidatious regarding discussion on citizenship eligibility noting there is already extremely high demand for SETS services with worries that any changes in eligibility would mean an overwhelming increase in the number of people seeking support. However, a plurality of SETS providers experience humanitarian entrants and vulnerable migrants who are recent citizens, lack English and systems-navigation skills, and cannot access services elsewhere and thus fall into a dangerous services gap. SETS providers flagged that other practices, such as Services Australia’s process to calculate the year of arrival in Australia as more practical regarding eligibility and triage for support.

Ineligibility and issues in reporting Community Capacity Building work and ‘community bridging’ activities with Australian citizens

CCB is crucial in effective settlement, with communities often the first point of contact for many humanitarian entrants and vulnerable migrants, essential in addressing issues in the community, and important for stakeholder engagement within the SETS program. In line with their grant agreements, many SETS providers are actively engaging new and emerging ethno-specific

community leaders through mentoring, leadership and community consultations. However, an interest, willingness, and capacity to assume a formal leadership role in a community takes considerable time after arriving in Australia. As a result, those who are willing are mostly refugees and migrants who have become citizens and are no longer eligible for SETS. This makes the grant arrangements less clear and challenging for SETS providers to align their DEX reporting with the eligibility criteria to exclude Australian citizens. Furthermore, community leaders are often reluctant to share demographic data and do not view themselves as ‘clients’, further complicating effective reporting on this part of the SETS program. This eligibility issue makes it challenging to effectively provide services which are ultimately aimed at humanitarian entrants and vulnerable migrants through CCB.

Another key component of settlement is ‘bridging’ newly arrived humanitarian entrants and vulnerable migrants with other communities, including longer-established members of the same ethno-specific community and other Australian citizens. The Australian Government’s *Refugee and Humanitarian Entrant Settlement and Integration Outcomes Framework* includes understanding host culture, community welcome, and belonging as distinct domains. However, events that bring together humanitarian entrants and vulnerable migrants with Australian citizens are currently disincentivised, given that despite the need to fund or logistically deliver an event with more attendees, SETS providers cannot report on those ineligible participants.

Other visa eligibility gaps

Vulnerable migrants on bridging visas and temporary visa types are key examples. Vulnerable migrants who are experiencing DFV are particularly vulnerable. Providers caution that these individuals continue to face heightened vulnerabilities due to compounding stresses including their precarious immigration status, their geographic isolation (for rural and regional dwellers), and the trauma of DFV. This cohort is sometimes eligible to receive government-funded immigration assistance, but because these legal services are based in metropolitan areas, additional support from SETS is needed, such as administrative assistance, help in locating psychologists to provide statements, and other practical supports. SETS providers have experience women who arrived on the Skills in Demand (SID) visa (subclass 482) approaching their organisations experiencing DFV, a reluctance to engage with a DFV specialist because of stigma and/or lack of trust, and SETS providers delivering unfunded and unreported services because of ineligibility and because the SETS providers cannot turn the vulnerable migrant away from their service.

Recommendations

Recommendation 1: Maintain the flexibility of SETS grant arrangements, while increasing the clarity of expectations, deliverables, and responsibilities.

The flexibility of the grant agreements allows SETS providers to deliver activities in a responsive, locally contextualised, and client-centred way, based on how the organisation and humanitarian entrants and vulnerable migrants find to be most effective. Increased clarity of expectations, deliverables and responsibilities, while ensuring that the grant agreements are not overly-

prescriptive regarding service provision, will enable providers – especially new providers – to better plan and deliver their activities. This can include through more active grant management to discuss grant agreements. Deeds of variation for supplementary funding should also be made clearer regarding expectations, deliverables, and responsibilities.

Recommendation 2: Add children and youth into the SETS arrangements as priority groups.

SETS providers should align with Australia’s world-leading National Youth Settlement Framework (NYSF), recognising refugee and migrant youth as a unique cohort with distinct needs, strengths, and opportunities rather than a subgroup of adults and families. While not all SETS providers serve large youth cohorts, a more explicit outline of young people in the grant agreements would further recognise their distinctness and importance in overall settlement, especially considering that dedicated programs such as the Youth Transition Support (YTS) is currently only delivered in three states. Children too should be outlined specifically in grant agreements, comprising a large proportion of the humanitarian entrant and vulnerable migrant cohort, and requiring unique and specialist consideration in the settlement program. Children and youth should be embedded as distinct yet overlapping priority groups under the grant agreements.

Recommendation 3: Increase the grant duration from three years to between five and seven years, which would be more appropriate for a grant program of the size and scope of the SETS program.

Increasing the grant duration would support longer-term organisational planning, community connection overtime, and workforce stability (including settlement staff retention, capability, skill within the sector), all of which would improve outcomes for humanitarian entrants and vulnerable migrants as a result.

Recommendation 4: Design funding for the program that better addresses the real costs of delivery and operations required for strong program performance.

Funding design should also account for the administrative intensity and coordination requirements of the program, include an option for complementary funding to respond to major increases in humanitarian entrants and vulnerable migrants in specific areas during the contract period, and better recognise the growing complexity and needs in the program, such as DFV response and effectively supporting economic participation.

Recommendation 5: Build in a regional funding loading and/or specific funding arrangements that account for the differentiated effort and associated costs for delivery in regional locations.

Embedding explicit regional delivery assumptions into funding and performance settings would account for distance and thin service ecosystems. Modified arrangements for regional providers would support equal delivery the settlement program in regional Australia.

Recommendation 6: Develop more effective communications between program administrators and service providers to improve the active management of the program.

- Standardise communications with providers and provide additional clarity around grant arrangements, program changes, and performance feedback, with increased face-to-face and on-site communications, while remaining cognisant of additional administrative burden. Continue the responsiveness from the funding arrangement management and the program policy holders.
- Implement a more joined-up approach between the Community Grants Hub and the Department of Home Affairs to answer questions and provide feedback.
- Increase communications for newly contracted service providers at the beginning of the grant program, especially clarification of grant agreements.

Recommendation 7: Actively reform and support DEX reporting, so that data is more reflective of the SETS program and more useful for service delivery organisations.

- Ensure more funded training for SETS providers to properly use DEX.
- Make DEX data more accessible for organisational use.
- Improve group-work and group-activity reporting in DEX.
- Address DEX reporting limitations (including through provider feedback) to ensure services delivered are being conveyed.

Recommendation 8: Continue to review program eligibility with SETS providers to ensure services are being provided to humanitarian entrants and vulnerable migrants.

For Australian citizens and humanitarian entrants and vulnerable migrants who fall just outside eligibility criteria, a number of strategies should be explored and developed.

- Alternative targeted funding sources: The program holders, the Department of Home Affairs, should work in partnership with the Department of Social Services, State and Territory governments, and other program providers to focus on the vulnerable new-citizens cohort and other humanitarian entrants and vulnerable migrants who do not meet the SETS eligibility criteria.
- Restricted eligibility and reporting carve-out: Develop a carve-out in allowable service (for example, 2-3% maximum allowable service under DEX reporting for citizens) for those who are most vulnerable, most in need of services, and are placed at risk by struggling to access ‘mainstream’ services (for example, women experiencing DFV). The carve-out could additionally cover community leaders under CCB, children who are Australian citizens in refugee families, high priority community ‘bridging’ events, and/or other visa eligibility gaps, towards supporting humanitarian entrants and vulnerable migrants.
- Increase the emphasis on capacitating and linking to mainstream services: Increase the program focus (including relevant program planning and reporting), with active government

involvement, on SETS activities that build capacity of mainstream services at a local and systemic sector level, in order to cultivate more effective referral pathways for humanitarian entrants and vulnerable migrants.

Contact

The Social Policy Group (SPG) is a trusted partner of government, community leaders and service providers with a proven track record of delivering impactful and responsive social policy solutions for Australia’s communities. As a peak body for settlement, multicultural health, and multicultural affairs, and a recognised leader in best practice and thought leadership across areas such as gender equality, economic analysis, access to justice, and community sector capacity building. SPG plays a pivotal role in fostering equitable social policies through facilitation, evidence-based practice, and collaborative partnerships.



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