

Are you an individual or making a submission on behalf of an organisation?

Organisation

Organisation name

FECCA

Is your organisation....?

- A peak-body

1. Does the new vision reflect what we all want for children and families?

The two current outcomes are a good start but too broad and not sufficiently inclusive or equity-focused. Outcomes should explicitly reference: cultural safety; CALD, First Nations, disability and refugee communities; and the role of community-led, co-designed services. Outcomes must also acknowledge the gendered nature of caregiving, family violence, unpaid labour and financial insecurity, which disproportionately affect multicultural women and shape children's wellbeing. They should also recognise structural determinants such as poverty, housing, visa status, racism and access barriers. More appropriate outcomes would emphasise that all families, in their diverse forms, can access culturally safe, integrated supports, and that children and young people are able to thrive in safe, inclusive environments with equitable access to opportunities across the life course, not just early childhood.

FECCA's work with multicultural families, including our national childcare and workforce participation advocacy, shows that outcomes must recognise the diversity of family structures—including multigenerational and kinship-based caregiving—and embed cultural safety, bilingual support and settlement-aware approaches. Families cannot achieve healthy, resilient outcomes without addressing systemic determinants such as visa status, credential recognition, racism, digital exclusion and lack of culturally appropriate early childhood and parenting supports.

2. Are the two main outcomes what we should be working towards for children and families? Why/Why not? - Outcome 1: Parents and caregivers are empowered to raise healthy, resilient children - Outcome 2: Children are supported to grow into healthy, resilient adults.

Previous comment covers questions 1 and 2 (Vision and outcomes)

3. Will a single national program provide more flexibility for your organisation?

While the three streams are broad, several critical supports are not clearly reflected.

- First, culturally and linguistically specific services – including bilingual workers, in-language resources and community-led programs – should be explicitly recognised, not simply assumed to sit across streams.
- Second, supports that address migration, visa insecurity, racism and service-navigation barriers for CALD and refugee families are not visible. AMWA also highlights the additional gendered impacts experienced by migrant and refugee women, including visa-linked dependency, heightened family violence risk, economic insecurity, lack of culturally safe DFV, mental health and parenting support, and unique access barriers.
- Third, disability-inclusive family supports, particularly for children with disability and their carers, are not clearly identified.
- Finally, community development and place-based capacity-building activities that strengthen local ecosystems and peer networks need more explicit recognition. Together, these gaps risk reinforcing existing inequities.

FECCA also notes, consistent with our recommendations for a reinvigorated National Settlement Framework, that many migrant families fall outside existing settlement supports yet require tailored information on parenting, childcare, health, domestic violence pathways, disability supports and early childhood development. Program structures must not assume universal access but actively resource settlement-appropriate, culturally safe supports—particularly through bilingual workers and co-designed models delivered by trusted multicultural and ethnic community organisations.

Streamlining programs must not unintentionally advantage large providers or reduce diversity in the service ecosystem. A balanced mix of small, medium and large organisations—including specialist multicultural, disability, family violence and settlement services—is essential to meeting varied community needs.

The proposed framework also appears to adopt a narrower definition of “family” than what exists in multicultural and First Nations communities, where caregiving roles often include extended kin, community members and chosen family.

4. Does the service or activity you deliver fit within one of the three funding streams? Do these streams reflect what children and families in your community need now – and what they might need in the future?

Previous comment covers questions 3, 4 and 5 (Program structure)

5. Are there other changes we could make to the program to help your organisation or community overcome current challenges?

see above

6. Do you agree that the four priorities listed on Page 4 are right areas for investment to improve outcomes for children and families?

The four priorities are broadly appropriate, but they are not sufficient to improve outcomes for all children and families. The priorities must explicitly include culturally safe, community-led supports for CALD, refugee and migrant families, who face unique barriers not reflected in the current framework. Disability inclusion is also missing, despite significant service gaps identified in previous reviews. Additional priorities should include: addressing structural determinants such as poverty, housing insecurity and racism; strengthening co-design and lived-experience governance; supporting community development and grassroots organisations; and ensuring settlement, visa and system-navigation challenges are recognised. Without these, investment will not reach the families most at risk. FECCA's research on women's equality and safety shows that migrant and refugee women are significantly impacted by inadequate childcare, lack of bilingual staff and systemic workforce barriers. Investment priorities must explicitly address these gaps, including culturally responsive early childhood services, better access to bilingual childcare, and supports for migrant families navigating housing, employment and income stress. Investment must continue to support universal and preventative services, not only high-risk cohorts, and ensure commitments extend across the full 0–18 age range rather than disproportionately focusing on early childhood.

7. Are there any other priorities or issues you think the department should be focusing on?

Previous comment covers questions 6 and 7 (Prioritising investment)

8. Do the proposed focus areas – like supporting families at risk of child protection involvement and young parents match the needs or priorities of your service?

The proposed focus areas are important, but they do not fully reflect the needs of CALD, refugee, migrant and disability communities. Families at risk of child protection involvement and young parents are priorities, but many CALD families face additional risks linked to visa insecurity, trauma, racism, limited system knowledge, and language barriers. These factors significantly affect family wellbeing yet are not acknowledged. FECCA's Train, Engage, Connect and Support (TECS) program demonstrates that CALD families frequently face complex, intersecting risks linked to gender norms, visa dependence, fear of systems, limited English and lack of culturally safe family violence pathways. These factors must be recognised as core contributors to family wellbeing, not peripheral considerations. The department should also prioritise among multicultural communities: children with disability and their carers; newly arrived and humanitarian families; multigenerational households; single mothers; and communities experiencing social isolation or digital exclusion. Approaches should include culturally safe, community-led models, bicultural workers, and tailored early-intervention supports. AMWA highlights that visa insecurity, racism, trauma and digital exclusion significantly affect migrant and refugee family wellbeing, and these must be explicitly recognised in program design.

9. Are there other groups in your community, or different approaches, that you think the department should consider to better support family wellbeing?

Previous comment covers questions 8 and 9 (Improving family wellbeing)

10. What are other effective ways, beyond co-location, that you've seen work well to connect and coordinate services for families?

Effective coordination goes beyond co-location. Strong models include: shared case management; warm referrals with follow-up; joint outreach in community settings; multidisciplinary teams; and partnerships with CALD organisations, schools, settlement services and disability providers. Community connection should be demonstrated through: use of bicultural workers; co-design with local families; partnerships with trusted community organisations; governance structures including lived experience; and evidence of culturally safe practice. FECCA's national consultations across settlement, aged care, health and women's safety consistently highlight the critical role of bicultural workers and trusted community organisations in connecting families to services. Co-location alone is insufficient without relational trust, interpreter pathways, and settlement-aware navigators who understand the cultural and systemic barriers families face. Applicants should be assessed on: depth and quality of local partnerships; cultural capability; accessibility (language, outreach, digital); proven engagement with

hard-to-reach groups; and their ability to adapt services based on community-level feedback and data.

11. What would you highlight in a grant application to demonstrate a service is connected to the community it serves? What should applicants be assessed on?

Previous comment covers questions 10 and 11 (Connected, co-located, and integrated services)

12. Beyond locational disadvantage, what other factors should the department consider to make sure funding reflects the needs of communities?

Beyond locational disadvantage, funding should consider cultural and linguistic diversity, migration and visa-related stress, disability prevalence, digital exclusion, racism and discrimination, social isolation, family violence rates, housing insecurity, and the presence of newly arrived or humanitarian communities. These factors strongly shape access to supports but are not captured in standard indices. FECCA's settlement and access-to-services research shows digital exclusion, childcare affordability, lack of bilingual staff, and limited settlement support for non-humanitarian migrants all significantly shape family wellbeing. These factors must be integrated into models of community need. To demonstrate genuine community need, organisations should show evidence of co-design; engagement with local community leaders/champions; use of bicultural workers; lived-experience governance; partnerships with CALD and disability organisations; qualitative insights from families; and data showing unmet demand.

Demonstrating adaptability and responsiveness to emerging community feedback should also be assessed. Responsibility for assessing and supplying community-need data should sit with government, not individual organisations, as many lack resourcing to conduct detailed demographic and service-mapping work. DSS should provide accessible, disaggregated, community-level data—including language, migration, disability and digital exclusion indicators—to support equitable planning and applications.

13. What's the best way for organisations to show in grant applications, that their service is genuinely meeting the needs of the community?

Previous comment covers question 12 and 13 (Responding to community need)

14. How could the grant process be designed to support and increase the number of ACCOs delivering services to children and families?

n/a

15. What else should be built into the program design to help improve outcomes for Aboriginal and Torres Strait Islander children and families?

n/a

16. What types of data would help your organisation better understand its impact and continuously improve its services?

Service providers need outcomes data that capture not just service reach but the cultural and systemic factors shaping outcomes for CALD children and families. There is a body of evidence that administrative data on cultural, ethnic and linguistic diversity are not collected consistent with the Standards, and recent commentary has highlighted that relying on CALD proxies without robust ethnicity data leaves governments and agencies without the information they need to plan for cohesion and fairness. Quantitative data should include service reach, demographics, language and interpreter needs, referral pathways, wait times, transitions and outcomes over time, while qualitative data should cover lived-experience narratives, cultural safety, system-navigation barriers, and experiences of racism or discrimination. At present, most administrative and research datasets rely on limited indicators such as country of birth and language spoken at home, which systematically undercount CALD populations and exclude many Australian-born children of migrant parents and people from increasingly diverse English-speaking countries. This undermines the accuracy of outcome reporting and the generalisability of research.

The most valuable outcomes to share include improvements in parenting confidence, family functioning, child wellbeing, safety, social connectedness, and access to culturally appropriate supports. For organisations using DEX, relevant SCORE Circumstances domains include family functioning, community participation, mental health and wellbeing, and safety. Outcomes measurement should also assess system performance—cultural safety, workforce capability and service accessibility—not just child and family indicators. Administrative datasets across portfolios should adopt consistent, disaggregated CALD measures (aligned with updated ABS standards and FAIR data principles) and make de-identified data available back to the sector in usable formats. To support case studies, providers would benefit from simple templates prompting: background and presenting issues; cultural and linguistic considerations; service model and adaptations; outcomes; system barriers; and client voice, ensuring the experiences of those often excluded from research are visible in evidence used to improve services.

References:

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17. What kinds of data or information would be most valuable for you to share, to show how your service is positively impacting children and families?

Previous comment covers question 16, 17, 18, and 19 (Measuring outcomes)

18. If your organisation currently reports in the Data Exchange (DEX), what SCORE Circumstances domain is most relevant to the service you deliver?

see above

19. What kinds of templates or guidance would help you prepare strong case studies that show the impact of your service?

see above

20. What does a relational contracting approach mean to you in practice? What criteria would you like to see included in a relational contract?

Relational contracting is understood as a genuine partnership built on trust, shared goals and flexibility, rather than transactional compliance. Key criteria should include: co-designed governance, cultural safety requirements, transparent data-sharing, flexibility to adapt services, long-term funding certainty, and fair pricing models. The department should prioritise organisations with strong community trust, proven cultural capability, place-based partnerships, and demonstrated success working with vulnerable groups (First Nations, CALD, refugee, disability). Decisions should not rely solely on expressions of interest. As a national peak body, we support relational contracting in principle where it strengthens culturally safe, community-led approaches—but only if it is co-designed with the sector and supported by adequate capability-building and transitional funding for both government and providers. There is currently limited shared understanding across the sector about what relational contracting entails in practice. Definitions, governance expectations, pricing principles and accountability mechanisms must be co-designed with peaks, ACCOs and service

providers before any implementation or trials proceed. FECCA's experience through national initiatives such as TECS demonstrates that relational contracting must be grounded in trust, cultural safety, and ongoing capability-building. For multicultural and settlement organisations, relational contracting must include clear expectations around interpreter access, bicultural workforce development, and co-designed governance with community leaders.

21. What's the best way for the department to decide which organisations should be offered a relational contract?

Previous comment covers question 20, 21 and 22 (Working together)

22. Is your organisation interested in a relational contracting approach? Why/why not?

see above

23. Is there anything else you think the department should understand or consider about this proposed approach?

FECCA submission to Proposed changes on families and children programs administered by DSS
5 December 2025

Who we are

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing people from multicultural communities and their organisations across Australia. Through the membership of state, territory, and regional councils and their members, we represent over 1,500 community organisations.

FECCA's work continues to be guided by our commitment to equity, dignity, and inclusion. We are dedicated to our role as a trusted advisor and partner to government, civil society, and communities, advocating for policy and systemic reforms that reflect the lived realities of multicultural Australia.

What we do

For over 45 years, FECCA has proudly worked alongside culturally and linguistically diverse communities, the broader Australian society and government to build a successful, productive, and inclusive multicultural Australia where everyone, no matter their background or how long they have lived in this country, has the opportunity to belong and reach their full potential.

FECCA draws on the lived experience of Australia's culturally and linguistically diverse (CALD) communities and the expertise of its extensive and diverse membership to develop and promote inclusive, innovative, and responsible public policy that reflects the needs and perspectives of multicultural Australia. We are committed to building a strong, innovative, and inclusive nation that harnesses its greatest strength, the diversity of its people.

FECCA's submission is informed by its two initiatives: 1) the Australian Multicultural Women's Alliance (AMWA), the national voice for multicultural women, and 2) the Australian Multicultural Health Collaborative (AMHC), the national multicultural health peak body.

AMWA brings lived-experience insights from migrant, refugee and multicultural women, highlighting barriers related to visa insecurity, racism, language, digital exclusion and system navigation that must be embedded within the reform design. It aims to empower women from all multicultural backgrounds to thrive and contribute fully to Australia's prosperity.

AMHC provides a national voice, leadership and advice on policy, research, data, and practice to improve access and equity, address systemic racism, and achieve better health and wellbeing outcomes for Australians from multicultural backgrounds.

Foreword

FECCA, AMWA and AMCH welcome the opportunity to provide feedback on the Department of Social Services' proposed reforms to supports and services for families, children and young people, announced by the Hon Tanya Plibersek MP on 23 October 2025. This submission responds to the Discussion Paper on reforms to the Families and Children Activity programs and sets out our shared concerns and recommendations to ensure that any new national program is culturally safe, gender-responsive and equitable for CALD migrant, refugee and disability communities.

For inquiries, please contact FECCA CEO Mary Ann Baquero Geronimo at ceo@fecca.org.au or on (02) 6282 5755.

Introduction

FECCA welcomes the opportunity to respond to the proposed reforms to child and family programs. As the national peak representing culturally and linguistically

diverse (CALD) communities, we strongly support the intention to simplify the system, strengthen early support, and improve outcomes for children and families.

Every year, the Australian Government invests around \$300 million through approximately 240 organisations under the Families and Children Activity to strengthen parenting capacity and provide prevention and early-intervention supports. Yet recent Australian Institute of Health and Welfare data show that as at 30 June 2024, about 44,900 children were in out-of-home care (7.7 per 1,000 children), and around 179,000 children—around one in every 32—came into contact with the child protection system in 2023–24.

Recent reporting on the Australian Early Development Census indicates record-high levels of developmental vulnerability at school entry, particularly in disadvantaged and remote communities, while analysis by The Front Project estimates the annual cost of “late intervention” at \$15.2 billion. These trends underscore both the scale of need facing families and the urgency of ensuring that reforms to child and family programs genuinely strengthen early, culturally safe and accessible supports for those most at risk.

FECCA draws on extensive work across health, aged care, family safety, women’s economic security, mental health, digital access, community development and our ongoing national advocacy for inclusive childcare, workforce participation and equitable access to essential services. We also note FECCA’s policy recommendations for culturally responsive family supports, improved interpreter access, and tailored settlement pathways for new and emerging communities.

1 Equity and inclusion

The current framework remains too broad and risks overlooking the specific and intersectional needs of CALD, migrant, refugee and disability communities—groups already underrepresented in evidence reviews and past consultations, including the National Multicultural Framework Review and related national consultations on settlement and family wellbeing.

2 Reform process and partnership

The reform process to date has caused concern across the sector. occurred without prior partnership-based planning, and provides limited detail regarding implementation and transitional arrangements. The short consultation timeframe—particularly at the busiest period of the year—creates barriers to meaningful engagement, especially for small and medium organisations, services in remote areas, and ACCOs. These process issues, documented by a broad cross-

section of national peaks and service providers, risk undermining the Government's stated intent of genuine partnership and co-design.

3 Structural barriers for CALD families

FECCA's previous submissions have highlighted that CALD families disproportionately experience barriers such as visa precarity, discrimination, lack of culturally responsive childcare and systemic gaps in access to essential services. Sudden reform processes without sufficient transition planning disproportionately impact these groups, who already struggle to engage with short-timeline consultations or complex grant processes.

4 Conditions for a successful reform

A successful reform must explicitly embed cultural safety, co-design, community-led approaches, and recognition of structural determinants such as racism, visa precarity, digital exclusion and social isolation. Without this, the reform risks reinforcing existing inequities rather than addressing them.

Key Recommendations

Strengthen equity and inclusion in the vision and outcomes

- Explicitly reference CALD, migrant, refugee and disability communities in outcomes, indicators and program guidance.
- Embed cultural safety, bilingual access and settlement-awareness as core principles.
- Recognise structural determinants—racism, visa precarity, poverty, digital exclusion, housing instability—as fundamental drivers of child and family wellbeing.

Embed culturally safe, community-led and co-designed approaches

- Require genuine co-design with communities and governance that includes lived experience.
- Resource bicultural/bilingual workers, interpreters and multilingual parental support.
- Support small and medium multicultural organisations whose trust and local engagement are essential to program success.

Expand and clarify program streams

- Make culturally tailored, disability-inclusive and migration-related supports explicit in all streams.
- Fund community development, place-based models and peer-led supports.
- Include multigenerational and kinship-based family structures common in multicultural and First Nations communities.

Improve assessment of community need

- Move beyond Socio-Economic Indexes for Areas (SEIFA) by incorporating migration demographics, visa status, language needs, digital exclusion, discrimination and settlement indicators.
- Require qualitative insights and community-led needs assessments, supported by government-provided data rather than unfunded expectations on organisations.

Strengthen investment priorities

- Clearly identify CALD, refugee, migrant and disability communities as priority groups.
- Invest in early-intervention supports such as culturally appropriate childcare, bilingual workforce capability and family violence pathways.
- Maintain universal and preventative services across the entire 0–18 age range.

Improve outcome measurement and evidence quality

- Combine quantitative and qualitative measures, including cultural safety, interpreter use, system-navigation experience and experiences of racism.
- Return usable data to the sector and provide templates for culturally grounded case studies.

Co-design relational contracting with the sector

- Develop shared definitions, governance expectations, pricing principles and accountability mechanisms before implementation.
- Ensure relational contracts support flexibility, cultural safety and long-term certainty.
- Prioritise organisations with demonstrated community trust, cultural capability and reach.

Adopt a partnership-based, realistic implementation process

- Extend consultation timeframes, create clear transition pathways and align reforms with related initiatives (e.g. Thriving Kids, National Settlement Framework).
- Ensure implementation is phased, transparent and inclusive of peaks, multicultural organisations, ACCOs, and frontline providers.

Conclusion

The proposed national program represents a significant opportunity to simplify the system, reduce fragmentation, and improve outcomes for children and families. However, this opportunity can only be realised if the reforms explicitly centre equity, cultural safety and the structural determinants that shape family wellbeing, and if implementation is grounded in genuine partnership with the communities most affected.

As highlighted throughout this submission, reforms of this scale require careful stewardship and a commitment to co-design. Without clear safeguards, the changes risk unintended consequences—such as reduced diversity in service

delivery, greater administrative burden on small and medium providers, and the further marginalisation of CALD, migrant, refugee and disability communities who already face the highest barriers to accessing support. Transparent transition planning, realistic timelines, and sustained investment in culturally responsive, community-led capability—including bilingual and bicultural workforces—are essential to avoiding these risks.

FECCA, AMWA and AMHC urge DSS to work closely with national peaks, ACCOs, multicultural organisations, frontline providers and lived-experience communities to ensure the reforms are implemented with integrity, inclusion and accountability. A program grounded in co-design, supported by accessible and disaggregated data, and aligned with broader national frameworks will build a system that not only integrates services more effectively, but genuinely responds to the needs of every child and family in Australia—regardless of culture, language, visa status, ability or postcode.

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