



NATIONAL ETHNIC DISABILITY ALLIANCE

NEDA's response to the Department of Home Affairs' consultation on partner visa reform

March 2021





Department of Home Affairs

Submission in response to public consultation on the English language requirement and on the sponsorship framework for the partner visa program

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About NEDA and General Comments

National Ethnic Disability Alliance (NEDA) is a national Disabled People's Organisation (DPOs) governed by¹, and constituted of, culturally and linguistically diverse (CALD) people with disability. NEDA is a founding member of Disabled People's Organisations Australia (DPO Australia), an alliance of four national DPOs.

The key purpose of NEDA is to promote, protect and advance the human rights and freedoms of all people with disability from CALD, migrant, refugee, and asylum seeker backgrounds.

NEDA's membership is made up of CALD people with disability; our state/territory member organisations are either CALD DPOs, CALD disability advocacy organisations or community led disability advocacy organisations with a demonstrated history of working in partnership with CALD people with disability and their communities.²

NEDA welcomes the invitation to provide our views and responses to the Department of Home Affairs' consultation paper on the Reforms to Partner Visa Program. We would welcome the opportunity to provide further comment and advise and encourage you to contact NEDA's CEO Mr Dwayne Cranfield at ceo@neda.org.au.

¹ Information pertaining to NEDA's Governance/Board can be found here: <http://www.neda.org.au/about-us/council-board>

² For more information about NEDA's membership visit: <http://www.neda.org.au/about-us/member-organisations>

Recommendations

1. NEDA recommends that the Government acknowledges the lifelong process of learning English, and how the diversity in languages spoken has shaped Australian multiculturalism, by not introducing English language requirements.
2. NEDA recommends that the Government reconsiders implementing English language requirements for sponsors who are permanent resident and applicants. English requirements will not protect applicants in abusive relationships, instead it will give perpetrators a tool for further control.
3. NEDA recommends the Government to conduct more research into why some partner visa applicants have low English literacy before implementing this policy. This will ensure that the changes are actually addressing the real reasons before implementing a policy that will complicate the migration process even further.
4. NEDA recommends the Government evaluates the outcomes of the upcoming changes to the Adult Migrant English Program (AMEP) before implementing English language requirements for partner visa applicants and sponsors.
5. NEDA recommends the Government to include cultural considerations around disability when formulating exemption policies and forms. Concurrently, we ask how the Government will address the known stigma surrounding disability in multicultural communities and how they will ensure that this is not becoming yet another barrier in family reunification.
6. NEDA recommends the Government to not implement the sponsorship framework as set out in the *Migration Amendment (Family Violence and Other Measures) Act 2018* as it is against human rights instruments, will prolong the time applicants have to stay temporary and will increase cost and waiting times which are already outrageously expensive and long.

English language requirements

Key Points

NEDA is deeply concerned with the introduction of English language requirements for partner visa applicants and sponsors who are permanent residents. As will become evident in this response, our members, CALD people with disability, are already facing discrimination in their migration process and the introduction of English language requirement is yet another barrier our members have to overcome.

The Convention on the Rights of Persons with Disabilities (CRPD) prevents discrimination against people with disabilities, including in all matters related to marriage, family and relationships.¹ The Australian Government has ratified the CRPD, however has received substantial criticism from the United Nations (UN) and affiliated reporting mechanisms denouncing policies which amount to migration-related disability discrimination.²

For many years, NEDA has consistently raised issues of discrimination faced by migrants with disability:

“The Migration Act 1958 is exempt from the Disability Discrimination Act 1992 meaning that potential migrants or refugees with disability who fail to meet the ‘health requirement’ are denied permanent residency on the basis that they are a potential ‘cost burden’ on the Australian taxpayer. In 2010, a Parliamentary Inquiry into the migration treatment of disability found that the health requirement unfairly discriminates against people with disability.³ For those who are granted permanent residency the Social Security Act 1991 bars access to the Disability Support Pension (DSP) for a period of 10 years leading to considerable barriers to social and economic support and participation. These policies are discriminatory; fail to take into consideration the social, economic and cultural contributions that people with disability make to our communities; and undermine the values of inclusion that as a nation we should be seeking to uphold.”⁴

NEDA’s members are already facing pre-existing migration related disability discrimination on their settlement journey. Introducing English language requirements is another barrier migrants and refugees with disability will experience. The proposed changes are discriminatory as they directly favour people from English-speaking countries, including those with disabilities. Taking into consideration that migrants and refugees with disabilities are navigating the complexities of their settlement experience whilst being subject to reinforcing and compounding disadvantages that stem from disability, language and cultural related factors, it becomes apparent how, as a group, they would be severely affect by the requirements as they would have very limited opportunities to develop English language proficiencies.

NEDA is of the strong belief that level of English proficiency should not be a determinant in assessing a person’s ability to contribute to the social, economic and political life of Australian society. Australia’s social fabric has been strengthened by generations of migrants who have struggled to speak English.

NEDA strongly opposes any additional measures that would further compound disadvantage or would prevent migrants or refugees with disability to be with their loved ones by unfairly limiting them from obtaining permanent residency.

Women and Domestic Violence

NEDA welcomes the priority from the Government to protect migrant and refugee women from family violence, abuse and other exploitation. Further to this, NEDA does not dispute the benefits of learning the language of the country you reside in. However, as this response will demonstrate, we are questioning if implementing policies requiring applicants to speak English will help to protect applicants who are experiencing family violence. Instead, we argue that rather than protecting migrants experiencing family violence, this reform will further isolate women on temporary visas and limit their access to support services. Additionally, we argue that introducing a language requirement discriminates against women as a cohort.

The Government's argument for introducing a language requirement is that women with a sufficient level of English would not face language barriers and would be more aware of Australia's laws and how to seek help. From NEDA's understanding of the evidence, which is in line with multiple studies, factors other than English proficiency play a larger role in determining if a woman on a temporary visa accesses appropriate support services.

ANROW's research into prevention of violence against women from CALD backgrounds highlights that it is the intersections of racism, language barriers, cultural and religious practices and the immigration process that leads to added complexity around this issue.⁵ Further to this, besides language barriers, CALD communities are facing multiple challenges when accessing family violence services:

- Distrust in law enforcement and state agencies;
- The family is very important for some CALD communities and the norm is to stay with your partner;
- Not considering violence as serious enough;
- Fear of losing custody of their children if they report violence.

Although women may have the words, the above-mentioned factors are so ingrained in one's culture and norms that CALD women may not speak up even though they have the English proficiency to do so.

Additionally, ANROW's and other studies^{6,7} also highlight how the migration experience, particularly the conditions of being on a temporary visa, adds to the level of trauma for CALD women experiencing family violence. Being temporary means that CALD women will have limited access to crisis support services and pathways to independence, and that withdrawal of sponsorship can be used as a threat and a way of exerting power over visa holders.⁸ The most powerful way to protect women on temporary visas who experience abusive relationships is by offering them permanency.

Recommendation

NEDA recommends the Government to reconsider implementing the English language requirement as this will not protect women in abusive relationships. Instead, it gives perpetrators a tool for further control.

NEDA believes that introducing English language requirements will further disadvantage migrant and refugee women. We know that women from developing countries have had fewer employment and education opportunities due to caring responsibilities, cultural norms and instability in their home country. CALD women continue to face barriers to participation in labour force and society after arriving in Australia.⁹ NEDA believes that meeting the proposed language requirement will be more challenging for women than men, due to the intersectionality of race, class, and gender that creates a more complex reality for migrant women.⁹ While trying to protect women, the proposed requirement discriminates against women as a cohort.

The Government's consultation paper reports that almost 15% of partner visa applicants self-declare that they speak English below very well. More information about this cohort would have to be obtained to better understand the real reasons for why they self-declare the way they do. Age, gender, disability type, socio-economic status, literacy in own language etc. are all factors that can explain the number. Before implementing a policy that will further complicate the migration process and further disadvantage our members, we urge the Government to get a better understanding of the 15%.

Recommendation

NEDA recommends the Government to conduct more research into why some partner visa applicants have low English literacy before implementing this policy. This will ensure that the changes are actually addressing the real reasons before implementing a policy that will complicate the migration process even further.

Willingness to Learn English

Multiple reports, such as reports by the Federation of Ethnic Communities' Council of Australia¹⁰ and the Scanlon Institute¹¹, show that migrant and refugees are very keen to learn English and that they see learning English as a key factor to successful settlement. The reports also indicate why some migrants and refugees have not been as successful in learning English as they would have liked to be. One frequently mentioned reason concerns the structure of the Adult Migrant English Program (AMEP), which will hopefully be solved with the introduced changes beginning 21 April 2021.

These changes will make it more accessible for people to attend classes while juggling multiple priorities (caring responsibilities, work, study etc.) by introducing after hours classes, online learning and a childcare attached delivery of the program. The 510-hour limit to free English tuition will be removed which will ensure that migrants and refugees will reach a higher level of English proficiency – acknowledging that this may take longer for some visa holders.¹²

With changes to AMEP and the willingness to learn English amongst migrants and refugees, NEDA believes that the English proficiency within these communities will increase without having to introduce language requirements for family visas.

Recommendation

NEDA recommends the Government evaluates the outcomes of the upcoming changes to AMEP before implementing English language requirements for partner visa applicants and sponsors.

Reasonable Effort

With these proposed changes, applicants and sponsors will be required to demonstrate a “reasonable effort” to learn English. Our members may face difficulties demonstrating reasonable effort to learn English if the classes are not accessible to them. Additional classes and online learning are great options but may not suit the needs of some multicultural communities as we know online learning can be a technical barrier. NEDA encourages the Government to ensure accessibility for people with disability will not be a barrier or ensure proper exemption policies in place so that this group will not be caught in a situation of visa refusal due to inaccessible English classes.

Australia has a long migration history with migrants from different parts of the world coming to Australia with little or no English. Generations of Australians have become citizens while still developing their English language skills and are a huge part of Australia’s identity. Many people in Australia, including Australian citizens, have low levels of English while still contributing to this country’s economy and culture. We see Australians, permanent residents and temporary visa holders with low levels of English proficiency working in our factories, farms, small businesses, creating enterprises and caring for family members while paying their taxes, supporting themselves and being a valuable member of their community.

While NEDA welcomes the free English classes, learning English can be a lifelong process. This is also a process that can and should take place outside the classroom. NEDA’s members are an important contributory part of their communities. Being part of your local community is a good way to enhance language skills. The same goes for employment, sport, volunteering etc. NEDA urges the Government to acknowledge that English can be learned outside the classroom and consider volunteering, community engagement, education and work experience under “reasonable effort.”

Recommendation

NEDA recommends that the Government acknowledges the lifelong process of learning English, and how the diversity in languages spoken has shaped Australian multiculturalism, by not introducing English language requirements.

Exemptions

As previously stated, NEDA does not endorse the proposed changes to the partner visa program. If the proposed changes are to go ahead, we do recommend that strong consideration is given to the English language requirement exemption process. NEDA is of

the strong belief that CALD people with disability, as a cohort, should be eligible for this exemption.

Our members come to Australia with a range of different lived experiences and there may be multiple reasons why people with disability from CALD backgrounds and their carers cannot meet the requirements. If English requirements are introduced, NEDA urges the government to acknowledge the range of individual reasons for why some people should be exempt from the English language requirement. This individualised approach ought to inform the exemption decision-making process.

Looking at best practices in other countries, both the UK and US have exemption forms that must be provided from a specialist confirming a physical and/or psychological reason that prevents the applicant from meeting the requirements.¹³ The following are also exempt:

- Aged 65 or over
- A victim of domestic violence as the partner or spouse of a British citizen
- A refugee living in the UK

NEDA endorses the above exemptions.

NEDA believes that anyone who have long-term physical, mental, intellectual or sensory impairments should be exempt from the English language requirements, as this is yet another barrier which in interaction with their impairment may hinder their full and effective participation in society on an equal basis with others. Extending the exemption to people with disability acknowledges that the group, as a cohort, experience compounding barriers to accessing a range of opportunities that would typically allow for English language acquisition.

Stigma around disability in multicultural communities

We know that our members commonly have experienced stigma around disability. The stigma can be carried over from their home country or between generations. Studies show how in Sub-Sahara disability is perceived as “witchcraft” and a “multigenerational curse”, in the Middle East disability is linked to feelings of shame and in parts of South and Southeast Asia disability is associated with “karma”.¹⁴ Stigma, myths and misconceptions create significant barriers for CALD people with disability in seeking help and support. Therefore, many CALD people with disability tend to not identify or believe they have a disability or address it.

Without knowing how an exemption would practically work, NEDA worries that the inherent stigma in these communities will lead to families not applying for an exemption to the English language requirement. CALD people with disability are already underrepresented in government services where they have to declare their disability and advocate for themselves. An example is the National Disability Insurance Scheme (NDIS) where there is a low uptake of CALD people with disability. One of the reasons are attitudinal barriers that prevents CALD people with disability to go to their General Practitioner and ask for support.

It is essential that cultural attitudes and stigmas are taking into consideration when formulating exemption policies and forms. NEDA would welcome the opportunity to provide further advise on how this may look like.

Recommendation

NEDA recommends that the Government includes cultural considerations around disability when formulating exemption policies and forms. Concurrently, we ask how the Government will address the known stigma surrounding disability in multicultural communities and how they will ensure application process will not become another barrier in family reunification.

Refugees and Humanitarian Entrants

NEDA is very concerned to learn that humanitarian entrants who want to be reunited with their family in Australia will not automatically be exempt from any language requirement. With the proposed changes, permanent residents, including refugees, will have to meet the English language requirements before they can sponsor anyone.

This is a group of people who have already experienced trauma, disadvantage and uncertainty in their life. This policy further disadvantages refugees, as they are very like to not speak English upon arrival. Concurrently, this cohort may also find it more challenging to learn English despite having access to free tuition. Studies highlights some of the factors associated with lower English, such as:

- Not being able to read or write in your own language¹⁵
- Trauma and psychological distress¹⁶
- Older age on arrival
- Never having attended school

Additionally, research shows that trauma has a negative effect on adults learning English. Further to this, interruption to education due to an unstable living situation in their home country or skipping school to work means that some refugees and migrants may not be literary in their own language. As mentioned previously, women face additional barriers, as they have caring and domestic responsibilities which may have prevented them from attending school.

By preventing humanitarian entrants from becoming permanent residents or sponsoring their spouse due to language difficulties, the government is penalising this cohort based on their traumatic experience.

Sponsorship Framework

NEDA is not opposed to a visa system aiming to support and protect migrants, however we believe that the current partner visa application process, where the applicant and sponsor are assessed simultaneously, is already providing that layer of protection. We believe the proposed changes to the sponsorship framework will further disadvantage migrants and refugees.

The current visa system allows applicants who are applying onshore (subclass 820/801) to live and work in Australia with their partner while they wait for a decision. With the new changes, since the sponsorship application is not an application for a visa, the applicant will not receive a bridging visa and may be forced to go back to their home country or find

another visa that allows them to stay lawfully in Australia. This adds additional waiting times and financial pressure on families.

Cost and Waiting Times

Both the English language requirements and the new sponsorship framework raise concerns over increased cost and waiting times.

While NEDA welcomes the increased amount of free language classes to our members, we are extremely concerned about the cost associated with getting an exemption. Our members' experiences with the NDIS have been costly – proving a disability includes multiple assessments and specialist reports at the expense of the applicant. Further to this, NEDA is worried that the introduced sponsorship framework will increase the overall cost of applying for a partner visa for the couple.

It is known that as a sub-group of people with disability, CALD people with disability experience significant disadvantage and marginalisation. Graph 1 and Table 1 contains data showing that when compared to non-CALD people with disability, CALD people with disability (as a cohort) have lower household income and live in areas of higher disadvantage.¹⁷ The partner visa process is already expensive compared to other comparable countries³ and we know that it puts couples under financial pressure. It is already financially challenging for CALD people with disability to sponsor their spouse and with the new changes implemented, it will be close to impossible. This is unfair, inhumane and unjust. Income should never determine who gets to be with their loved ones.

Long processing times are stressful and emotional for those waiting. The current partner visa system is split into two visas, which means that applicants are waiting a minimum of two years for their permanent residency. Very often, this will be closer to three or four years. Whether you are waiting for your decision onshore or offshore, the uncertainty and concerns over the risk of a visa rejection affects the wellbeing of both applicant and sponsor. Couples and families are forced to put their lives on hold. Some couples may be forced to live in separate countries while they wait, which impacts when they can start a family together, or buy a property. Applicants waiting onshore with their partner may be struggling to find permanent employment due to being a temporary visa holder. Similar to offshore applicants, people will not settle if there is no certainty.¹⁶

By introducing changes to the sponsorship framework, the wait for permanent residency will undoubtedly be longer. The applicant will be forced to find another valid visa to stay lawfully in Australia or leave the country. As the sponsorship framework has not been implemented yet, we are yet to learn how long it will take to obtain a sponsor approval. Based on the Department's history with backlogs of visa applications, NEDA is extremely concerned with the prospect of increasing waiting times for spouses to become a permanent residency under the family visa stream. While the changes to the sponsorship framework aim to protect applicants in abusive relationships, it keeps the applicant on a temporary visa for longer without being able to access crucial crisis support services.

³ An Australian partner visa costs close to \$8,000 where the US partner visa costs \$2,100, New Zealand Partner Visa costs \$2,000 and the UK Partner Visa costs \$2,700.

Australia's Family Reunion Obligation

The right to family life, family unity and no interference in it is a fundamental human right which is recognised by international law, such as Article 16(3) of the 1948 Universal Declaration of Human Rights (UDHR), Article 17 and Article 23(1) of the 1966 International Covenant on Civil and Political Rights (ICCPR), Article 10(1) of the 1966 International Covenant on Economic, Social and Cultural Rights (ICESCR) and Article 23 of the Convention on the Rights of Persons with Disabilities. All conventions are ratified by Australia.

Under international law, the family is recognised as a fundamental group or unit of society and is entitled to protection and assistance and which should not be subject to arbitrary or unlawful interference with privacy, family, home or correspondence. Being separated from your loved ones due to extreme processing times for visa applications is a breach of fundamental human rights instruments. Being denied to sponsor or the opportunity to become a permanent resident because of your English proficiency is discriminatory towards Australians whose partner may not have what the Government deems 'functional English'.

The benefits of family reunification to the community and economy cannot be underestimated. Besides being a fundamental human right, being with your family is crucial for refugees rebuilding their lives in Australia; being with your family is crucial for migrants settling as they are less inclined to be isolated,

Recommendation

NEDA recommends the Government to not implement the sponsorship framework as set out in the *Migration Amendment (Family Violence and Other Measures) Act 2018* as it is against human rights instruments, will prolong the time applicants have to stay temporary and will increase cost and waiting times which are already outrageously expensive and long.

Concluding Remarks

The introduction of the English language requirement for permanent resident sponsors and partner visa applicants, and the proposed sponsorship framework set out in the *Migration Amendment (Family Violence and Other Measures) Act 2018* ought not to be adopted.

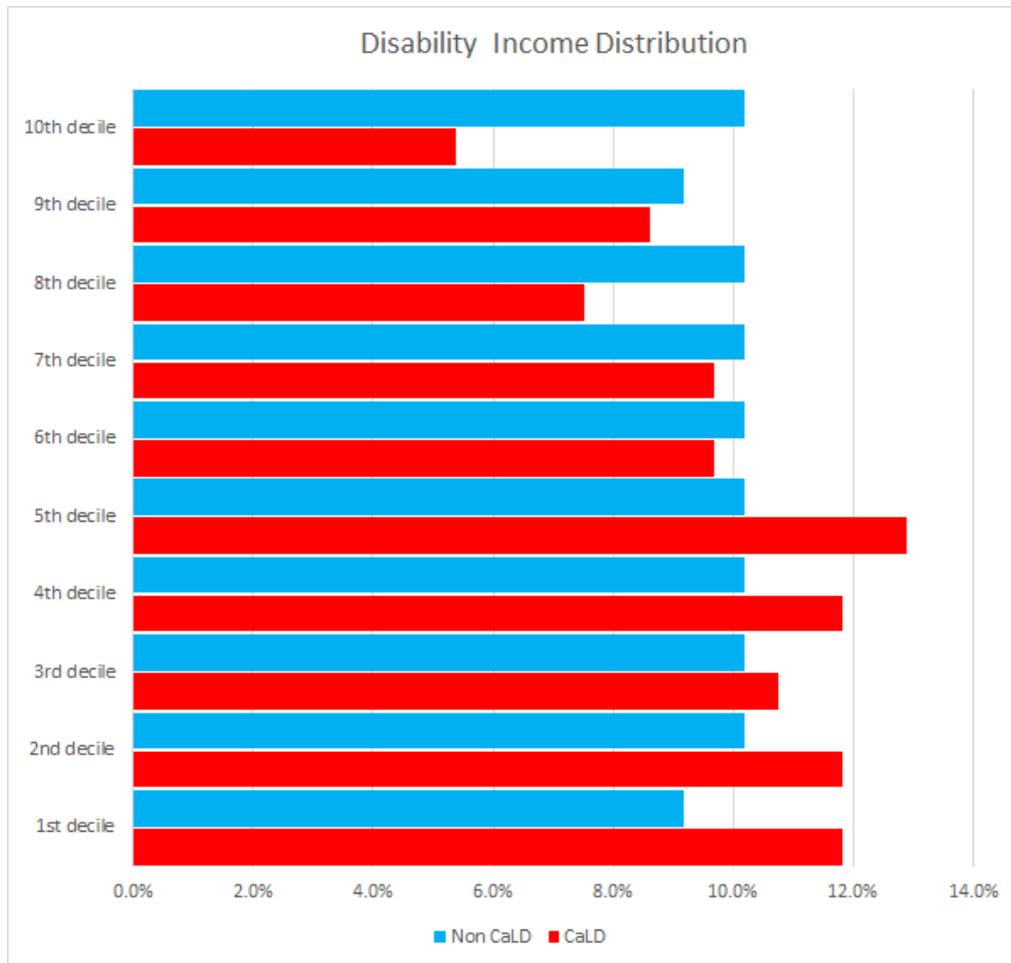
NEDA does not believe that implementing English language requirements will protect applicants experiencing family violence – only permanency can do that. Instead, it will create additional barriers and further complicate family reunification for our members who are already disadvantaged in the settlement process.

If the Government decides to implement the changes, which we strongly discourage, NEDA calls for:

- All CALD people with disability, humanitarian entrants, anyone ages 65 and over, survivors of domestic violence to be exempted;
- Culturally appropriate exemption forms;
- Ensuring that there will be no cost and increased waiting times with obtaining exemptions.

Appendix

Figure 1: Disability Income Distribution



Source: ABS SDAC 2018 Survey Tablebuilder

Table 1: Those with a disability by CaLD status by Social Disadvantage (Quintiles) by Income (Deciles)

	CaLD					Non CaLD				
	Social Disadvantage					Social Disadvantage				
	Quintile 1	Quintile 2	Quintile 3	Quintile 4	Quintile 5	Quintile 1	Quintile 2	Quintile 3	Quintile 4	Quintile 5
10th decile	11.7%	0.0%	28.9%	10.9%	48.4%	10.9%	19.2%	18.5%	24.5%	26.8%
9th decile	10.3%	30.8%	16.0%	27.6%	15.4%	12.7%	18.3%	19.2%	20.8%	29.0%
8th decile	0.0%	37.5%	18.8%	26.6%	17.2%	21.0%	17.5%	20.2%	20.7%	20.6%
7th decile	8.1%	16.9%	36.5%	18.9%	19.6%	20.8%	20.0%	19.0%	17.8%	22.3%
6th decile	36.6%	30.0%	14.1%	4.4%	15.0%	23.2%	18.7%	23.1%	19.8%	15.2%
5th decile	17.3%	18.9%	30.5%	18.9%	14.3%	31.4%	17.8%	19.4%	18.2%	13.2%
4th decile	31.3%	29.5%	16.8%	10.3%	12.0%	35.6%	21.7%	18.4%	14.6%	9.7%
3rd decile	23.6%	34.1%	15.7%	16.6%	10.0%	33.0%	23.7%	18.1%	15.7%	9.5%
2nd decile	19.8%	25.3%	20.2%	11.6%	23.1%	21.3%	20.8%	21.8%	18.1%	18.1%
1st decile	28.3%	25.0%	9.9%	24.0%	12.7%	21.3%	17.7%	23.0%	19.4%	18.6%

Source: SDAC 2018 ABS Survey Tablebuilder

*Quintile 1 and Decile 1 represent those with the lowest income and living in the most disadvantaged areas.

¹ Convention on the Rights of Persons with Disabilities

<https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html>

² UN Human Rights Council, Report of the Special Rapporteur on the human rights of migrants on his mission to Australia and the regional processing centres in Nauru (A/HRC/35/25/Add.3), 24th of April, 2017, Available at: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/098/91/PDF/G1709891.pdf>

³ Joint Standing Committee on Migration, Enabling Australia: Inquiry into the Migration Treatment of Disability, 2010, Available at:

https://www.aph.gov.au/parliamentary_business/committees/house_of_representatives_committees?url=mi/g/disability/report.htm

⁴ Disabled People's Organisations Australia, Submission to the Department of Treasury, 'Priorities for the 2017/18 Federal Budget', January 2017, p.14.

⁵ Koleth, M., Serova, N., & Trojanowska, B. K. (2020). Prevention and safer pathways to services for migrant and refugee communities: Ten research insights from the Culturally and Linguistically Diverse Projects with Action Research (CALD PAR) initiative (ANROWS Insights, 01/2020). Sydney, NSW: ANROWS.

⁶ <https://awava.org.au/wp-content/uploads/2018/12/National-Report-on-Women-on-Tempo...3-compressed.pdf>

⁷ https://intouch.org.au/wp-content/uploads/2020/03/inTouchPositionPaper_WomenOnTemporaryVisasExperiencingViolenceInAustralia_March2020_website.pdf

⁸ https://bridges.monash.edu/articles/online_resource/Family_violence_and_temporary_visa_holders_during_COVI

⁹ <https://humanrights.gov.au/about/news/speeches/economic-rights-migrant-and-refugee-women>

¹⁰ https://fecca.org.au/wp-content/uploads/2019/10/FECCA-Community-Driven-English_WEB.pdf

¹¹ https://scanloninstitute.org.au/sites/default/files/2020-01/June2019_Scanlon-Institute_Narrative-3.pdf

¹² <https://immi.homeaffairs.gov.au/settling-in-australia/amep/about-the-program/background>

¹³ <https://www.gov.uk/english-language/exemptions>

¹⁴ Julie King, Niki Edwards, Ignacio Correa-Velez, Sara Hair, and Maureen Fordyce, 'Disadvantage and disability: Experiences of people from refugee backgrounds with disability living in Australia' (2016) 3 Disability and the Global South 844, 845.

¹⁵ https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Migration/settlementoutcomes/Report/section?id=committees%2Freportjnt%2F024098%2F25143#footnote9target

¹⁶ <https://fecca.org.au/wp-content/uploads/2020/02/FECCA-Consultation-Report-2019.pdf>

¹⁷ National Ethnic Disability Alliance (NEDA) 'Submission in response to Department of Social Service's July 2020 National Disability Strategy Position Paper. NEDA. October 2020.