

Feedback on The Australian Standard for Welcoming Cities - pre-release (v0.16) and public draft (v1.0)

Ref	Category	Version	Feedback
1	Content	V0.16	Many of the policies are not the responsibility of local government and would be better directed at the Australian Local Government Association or state governments (e.g. policing, Office of Multicultural Affairs, Education Depts)
2	Implementation	V0.16	Local governments do not have the time or dollar resources to meet many of the responsibilities in the draft
3	Implementation	V0.16	The draft standards require council to introduce more than 30 policies and programs which is not achievable or desired
4	Implementation	V0.16	If a local government does have a dedicated multicultural officer on staff, their time in meeting these policy needs would prevent them from creating any hands-on change in the community. All their time would be spent on writing policies and getting them adopted by council, rather than doing pro-active projects with the community. The outcome is that many local governments would reject your invitation to become involved in Welcoming Cities, or take up to 10 years to achieve accreditation
5	Accreditation	V0.16	It should be self-accreditation with no external auditors
6	Accreditation	V0.16	Encourage you to look at some of the other accreditation processes underway at present. These include Age Friendly Cities, cybersafe and ICLEA. It is worth noting that a meeting of community development managers in Perth decided not to go ahead with Child Friendly Cities because the suggested accreditation was too onerous to achieve
7	Implementation	V0.16	We prefer that the draft standards are shortened to include a Declaration (we the undersigned local government commit to being a welcoming city etc.) plus an action plan which lists the commitments (equity in employing overseas born staff, translation services for five most frequently spoken languages, English lessons, access to migrant services at local libraries etc.). Once a council meets (for example) 10 of the commitments, it becomes a Welcoming City, with an annual subscription fee of less than \$1500. (Note there is no fee for age friendly city run by the United Nations)
8	Comment	V0.16	All local governments, whether they have achieved Welcoming City or not, have access to the resources, so they can improve their relationships in their cities (once they start paying the subscription).
9	Consideration	V0.16	We encourage you to seek input from the Australian Local Government Association who can adopt some of the policies that you wish to pursue. It may also be worth contacting IAP2, the peak body for community engagement, to seek their involvement. One of these two organisations may want to sponsor your annual award.
10	Content	V0.16	Striking a balance – I think the standards may need to reflect the diversity in the LGA sector. I got the feeling that the standards were put together with larger councils like Brisbane in mind? Councils any smaller than Stirling I think would really struggle to meet all of the standards in their current form. Regional LGAs in WA may have one community development officer who is responsible for many different portfolios. I wonder whether you could look at developing broader indicators that leave a bit more room for the Council to do what it can within its existing structure/resourcing. Or perhaps you could develop a minimum standard with examples of how Councils may take it to the next level
11	Implementation	V0.16	Avoid being too prescriptive – I felt that standards were too prescriptive in certain areas and left insufficient room for Council's to determine how they might best meet the standard based on the needs of their community, their structure and resourcing. You could achieve this by sticking with the headline indicators
12	Terminology	V0.16	Use of the term program – I think when LGA's think of 'programs' they generally think of a standalone activity/service area which needs to be established and resourced. This may be off putting for smaller LGAs who may not have resources to put into establishing new programs. I think in this context strategies that mainstream a focus on newcomer inclusion throughout a range of existing LGA functions can be more effective and easier to sell. Amending the language to use a term like strategy or initiative instead of program would allow for LGAs to apply targeted/mainstreaming approaches according to the communities needs and their organisational capacity
13	Terminology	V0.16	Use of language – we recently held a consultation with our Multicultural Advisory Group on the development of Multicultural Framework for the City. As part of this discussion we talked about wanting to come up with some inclusive terminology that we use consistently throughout the Framework document and more broadly as an organisation. The group's preference was for use of the term 'newcomer' when referring to new members of the community. This was widely preferred over migrant, refugee, asylum seeker as it assumes membership of the community and doesn't pigeonhole people based on how they may have got here. You may like to consider potentially using this term (widely used in Canada)
14	Content	V0.16	Focus on the role of Australian LGAs– parts of the standards feel like they are written for North American local governments which are responsible for a wider range of services often including administering public housing, health, employment and justice services. It is also true in Australia that unlike the US we have a settlement sector that plays an important role in supporting newcomers. I think attention needs to be paid throughout the document to ensuring that the standards stick as closely as possible to the role of local government in an Australian context, taking into account the responsibilities of other tiers of government and the settlement sector. It may also be possible to add in reference to the functions of local governments that are more relevant in the Australian context i.e. the role of community centres, libraries, place-making activities
15	Content	V0.16	The Civic Engagement section refers to facilitating migrant participation in public hearings, commissions and boards – this again sounds like the wording is targeted at North American Councils. I would substitute this with committees, advisory and working groups
16	Accreditation	V0.16	Peer to peer mentoring and assessment – this is an option that you may like to look into along with self-assessment and independent evaluation. The Eurocities Integrating Cities initiative implemented a peer mentoring project where they facilitated City to City support on implementing the Integrating Cities charter https://www.flipsnack.com/F6F7ACD9E8C/implemmentoring-leaflet.html . Thomas Jezequel is a good contact to find out more about this initiative
17	Content	V0.16	Partnership Development' - This is a bit vague – it would be useful to have some examples of what is meant here.
19	Content	V0.16	Principle 5 - Which leaders do you mean here? Civic, Govt, Ethnic? Business?
20	Content	V0.16	Principle 6 - What would this look like in practice?
22	Content	V0.16	GL2.2 - 'Multisector' - Needs defining
23	Content	V0.16	GL3 - What's the distinction between this and GL8 – needs further clarification.
24	Content	V0.16	GL4.3 - What about access to translation and interpretation services?
25	Content	V0.16	GL5 - What would this involve?
26	Content	V0.16	GL6 - What about a programme to increase the inter-cultural competency skills of the existing workforce?
27	Content	V0.16	GL7 - Could be clarified
28	Content	V0.16	GL8 - Is this the Welcoming Plan?
29	Content	V0.16	GL8.5 - This probably needs to be taken up a level. – See addition at GL11
30	Comment	V0.16	GL10.3 - Amazed that this needs to be stated!
31	Content	V0.16	EA1 - Seems to be an overlap/duplication between EA1 and EA3?
32	Content	V0.16	EA2 - We think it might be better to reframe this as 'All council and shire policies are required to ensure that they do not intentionally or unintentionally exclude or disenfranchise migrants'
33	Content	V0.16	EA2.1 - Which codes?

34	Content	V0.16	EA3.2 - All staff? Front line only?
35	Content	V0.16	EA4 - The wording here is a bit unclear as to what outcome is sought.
36	Content	V0.16	EA5.TR1 - Wondering what is feasible here? Support for driver licensing programmes? Needs to be a bit more specific.
37	Content	V0.16	CE1 - For these sort of programmes, it's potentially more welcoming to include both migrants and non-migrants in programmes together – i.e. make sure migrants are able to access mainstream programmes rather than having ones specific to migrants.
38	Content	V0.16	CE5 - Not sure whether this quite fits in a Welcoming standard. NZ has its own agency to undertake this work – the Immigration Advisor Authority.
39	Content	V0.16	EE3.3 - Volunteering can also be a useful stepping stone.
40	Content	V0.16	EE3.6 - This is a big ask! Is this about Council's own workforce? Easier to address.
41	Content	V0.16	EE7.1 - Is this meant to be providing actual support to enrol, or just information?
42	Content	V0.16	EE8.2 - How?
43	Content	V0.16	EE8.3 - Is this something that would be done at the local govt level?
44	Content	V0.16	SC1 - ??
45	Content	V0.16	SC4.2 - What is intended here? That the policy ensures that migrants are able to maintain their cultural practices around birth, marriage etc.? What about forced marriage?
46	Content	V0.16	CM1.1 - Unsure how this would be actioned in practice.
47	Content	V0.16	CM2.1 - Ensure migrants are able to safely report conflicts and discrimination.
48	Comment	V0.16	The Principles are all supported, especially the first recognising Aboriginal and Torres Strait Islander people.
49	Terminology	V0.16	Some of the language may need review. For example, its suggested to use: o Council areas, not council agencies o State government, not state agencies or state council(s) o Federal government, not federal agencies o Municipal / council, not city
50	Terminology	V0.16	Target community may need clarification. References to 'minorities', 'diverse populations / communities' and 'inclusion efforts' could be read to include not only migrants (as defined in this glossary), but also people who are Indigenous, LGBTI, have disability et cetera. Suggest replacing all such terms with 'migrant' (if this term is to be kept). NOTE: while we use 'migrant' in this feedback, it is not preferred – see Glossary comments.
51	Content	V0.16	It may be useful to mention council obligations under the 2006 Charter of Human Rights and Responsibilities Act. It would cover examples such as EA2.2 (policies comply with Federal and State policies on non-discrimination), which in turn cover those such as EE3.6 (addressing discriminatory practices in employment; at least for councils).
52	Content	V0.16	The Standard does not reflect the roles of Australia's three levels of government and the need for them to work strategically and collaboratively for the benefit of the community. Many of the examples would not only duplicate the work of Federal and/or State government, but incur additional costs for local government in the context of increasing financial commitments for councils.
53	Content	V0.16	Much in the Standard focuses on services or responses not in councils' scope. What could be increased is the preventative work that councils can and do undertake to prevent or reduce racism and to build social cohesion.
54	Implementation	V0.16	It is recommend to review the Standard from the perspective of smaller, regional and/or rural councils. They have limited resources dedicated to this area (staff and financial) and to support this large scale accreditation program. These councils have lower and more and dispersed populations, less cultural diversity and fewer potential partners.
55	Content	V0.16	The Standards' focus on economic participation (or using it as a key driver for inclusion) may not be reflective of the Australian social and political context, which also sees other areas of participation as key to migrants' connection to community, health, safety and wellbeing.
56	Consideration	V0.16	Increasingly, councils are taking intersectional and broader diversity approaches to supporting migrants, which we support. For example, initiatives that focus on migrants who are LGBTI or have a disability, or vice versa (the initiative isn't always led by the 'migrant' focused council unit, but by other units taking a 'migrant lens' over their own work). Perhaps an example(s) could be added to acknowledge that such approaches are an important part of welcoming people, and to adapt the Standard to the increasingly intersectional Australian context.
57	Consideration	V0.16	Key inclusion and diversity indicators such as employment, housing, health and wellbeing, diversity in leadership, education, access and equity could perhaps be better integrated into the Standard. This will ensure that it links to issues that matter significantly to people in their everyday life, is kept relevant, and leads to necessary actions and changes. Perhaps the Standard could ask that councils establish municipal and time specific measurable benchmarks against these indicators.
58	Comment	V0.16	The Standard is seen as very thorough and that to achieve all current examples would be beyond most councils, including large ones such as the City of Melbourne (at least at the moment). However, this makes the Standard aspirational; in a positive way.
59	Comment	V0.16	A key benefit of Welcoming Cities is that it will resource local government with tools and examples of evidence based practice for ongoing inclusion of newly arrived migrants in both social and economic spheres.
60	Comment	V0.16	Councils may appreciate a statement in relation to 'Intercultural Cities' and the Cities of Migration's new 'Building Inclusive Cities' (though perhaps not in the Standard).
61	Comment	V0.16	Similarly, clarification on the role of non-council organisations as Welcoming Cities supporters would be welcomed.
64	Accreditation	V0.16	Wherever possible, it would be ideal for the majority of research / information gathering across council areas be conducted by the third party accreditor. This would not only suit councils (whose community development resources are likely to
65	Accreditation	V0.16	Likewise, joining, annual and assessment fees should be kept as low as possible.
66		V0.16	Given the requirements cut across council areas, and to encourage shared responsibility for welcoming across council, it is recommended that correspondence make this approach clear, and is not directed towards community development staff.
67	Accreditation	V0.16	The proposed rating, two-yearly re-evaluation (pending it is simple) and implementation support is commended.
68	Accreditation	V0.16	The proposed National Award should be developed in consideration / consultation with similar existing awards, for example Victoria's Multicultural Awards for Excellence Local Government category.
69	Accreditation	V0.16	It may be useful to ask councils their thoughts on how similar accreditation programs could be improved, for example Intercultural Cities and the Rainbow Tick.
70	Consideration	V0.16	The 'Commitment to Participate in the Welcoming Cities Network' refers to a "network of cities and communities that are committed to becoming more welcoming". Such a national network of local government staff would be very welcomed, and meet a need in the sector. Currently there only some state / territory based networks; for example the MAV supported Victorian Local Government Multicultural Issues Network. A national network such as that proposed by Welcoming Cities would give local government authorities a central reference point of knowledge and resources needed to design and implement diversity policies at the local level. Perhaps participation in the national network could be included in the Standard; the sharing of projects, activities and knowledge between councils not only benefits the organisation, but the community.
71	Comment	V0.16	Notwithstanding the above, it is assumed that joining Welcoming Cities will not commit councils to utilise a single point of reference but will complement existing knowledge, capacity, resources and partnerships.

72	Comment	VO.16	It is important that ownership and branding of local action rests clearly with local government authorities working in partnership with local groups and organisations to ensure effective progress of community - council collaboration.
73	Comment	VO.16	The immediate benefits of undertaking the accreditation process may not be as clear as they could be, particularly for councils already active in creating welcoming communities, through numerous strategies, activities and partnerships. The
74	Consideration	VO.16	City of Melbourne suggested to align the seven categories with the seven letters of 'Welcome', to give an opportunity for performance in each category to be visually measured / represented; see below. The different blue levels would represent a council's level of achievement / accreditation in each of the seven areas.
75	Consideration	VO.16	On behalf of Federal and State governments, Australian (and especially Victorian) councils deliver and/or coordinate maternal and child health (MCH) services, kindergarten and home support / community care for seniors and people with disability. As these are important to settlement, suggest increasing examples in these areas, without being too prescriptive (given they are externally funded and agreed to).
76	Consideration	VO.16	Similarly, many councils run and/or support events or activities on key dates for multicultural and faith-based communities. For example during Ramadan, Diwali, Lunar New Year and cultural diversity and refugee weeks. Suggest including an example(s) for this to acknowledge the work councils already undertake, and encourage others. This could perhaps go alongside GL10 (communication activities).
78	Terminology	VO.16	Migrants, Migrant Community, Immigration Suggest that this definition be presented towards the beginning of the Standard document, and replacing 'foreign-born' with 'overseas born', adding 'asylum seekers' and removing the terms 'naturalised' and 'non-migrant visas'. Other than refugee, humanitarian and tourism visas, all visas are temporary or permanent migrant visas (including student visas). 'Migrant' isn't an ideal term; it's not commonly used in Victoria's local government or multicultural sector to refer to all the groups included in the definition. This is likely because it can be seen to ignore the important differences between them (e.g. refugee experiences differ greatly from that of migrants), and since all groups (especially their children) are often keen to move on from this identification. Migration is a process that comes to an end when a person has settled or has been settled or obtains legal residency or citizenship. Suggested terms are 'multicultural / culturally diverse communities', 'people born overseas', 'people with a multicultural background', 'newcomers' or 'new arrivals' (despite the latter's potential to include people migrating within Australia, but this is mitigated by the context).
79	Terminology	VO.16	Programs (including partnership programs) Suggest that this clarification be presented before the examples / requirements (at least in summary) so as not to deter potential participants. As currently structured and worded, some items may cause councils concern, such as EA5, CE2, CE3 and EE3-8. Councils involvement may be limited to promotion of others services and some advocacy. Councils may find the requirement for formal multi-sector collaborations for the many partnership programs to be a deterrent, and request clarification of what's expected and the degree of their commitment / involvement. For example, for EA5.3 would it be enough to promote another organisations work to address scams? Or for CM3, where discrimination occurred outside council, would it suffice to refer people to the Victorian Equal Opportunity and Human Rights Commission (VEOHRC)? Many of the partnership programs would depend on the interest and resources of Federal or State government, or other organisations; rather than on councils'. As accreditations progress, there may not be many who complete the larger partnership requirements (this may be due to Australian councils having responsibility for fewer services than USA councils, for whom I understand the Standard was initially developed). The term 'program' may also benefit from review as it can imply efforts more significant or formal than would be necessary. Suggest 'initiative'. This would also go some way to considering the position of rural and regional councils, for whom there are limited or even no appropriate organisations / businesses / service providers with whom to partner. Perhaps the examples should be less prescriptive and/or specify 'where partners are available'.
80	Terminology	VO.16	Receiving Community Suggest replacing 'native' with 'Indigenous' communities.
81	Content	VO.16	GL2 A policy is in place that designates a dedicated role / roles or unit focused on migrant inclusion work. Comment: Many councils will not meet this example either due to resources or choice. It's increasingly common for councils to see more benefit in having a whole of council approach where multiple units and roles contribute to inclusion work (for example Greater Dandenong no longer have 'cultural diversity' roles).
82	Content	VO.16	GL4 A program is in place to provide information and support to migrants on accessing community services and resources. Comment: Suggest clarification of 'community services and resources'; are these council services, and/or those offered by community based organisations? If so, suggest that this be a partnership program. If not, suggest 'council services' and review of the indicators; while councils could provide information on them (perhaps in partnership), they are not council services. There is value in councils better promoting their own services and resources.
83	Content	VO.16	GL4.1 The program provides information on available council resources such as local council services and public benefits. Comment: Councils do not provide public benefits (as in welfare, which is a Federal government responsibility). Suggest removal or clarification of this term.
84	Content	VO.16	GL4.2 The program provides information on visas and citizenship. Comment: Beyond referring people to the Commonwealth Department of Immigration and Border Protection (DIBP) and advising citizenship candidates of ceremony dates and processes, it is not councils' role to provide information on USA and citizenship.
85	Content	VO.16	GL6 A program is in place that promotes employing a local council workforce that reflects the diversity of the community. GL6.1 The program addresses identified barriers in processes or systems that may limit inclusion. GL6.2 The program supports access to information about relevant local council job openings in an inclusive manner. Comment: Councils may have a workforce that is more diverse than their community; though it's unlikely that councils would take GL6 to mean a reduction of diverse staff. The indicators of this example are perhaps more accurate of the intention; a diverse workforce doesn't mean an inclusive workforce, which is the key. Suggest rewording this example.
86	Content	VO.16	GL7 A program is in place to advance local and minority, including migrant, owned business sourcing and contracting. GL7.1 The program addresses the barriers for minority, including migrant, owned businesses to access council contracting opportunities. Comment: It's unclear if the program would also need to address non-migrant local and minority owned businesses (for example Indigenous, LGBTI et cetera). It's recommended that given the context of the Standard, the program only need address migrant owned businesses.
87	Content	VO.16	GL9.1 The program aims to reframe public debate about migration, where necessary. Comment: Perhaps greater indication of what the public debate should be changed to.
88	Content	VO.16	GL10.5 The local government presents consistent and compelling counter messages to negative messages portrayed in local media. Comment: This is largely dependent on the resources available to the councils' communications unit, and on how many negative messages are portrayed in local media. Councils are likely to prefer to have a standing position of support for migrants on their website, at their offices et cetera, rather than agree to consistently respond to negative media.

89	Content	V0.16	<p>EA1 A comprehensive language access policy is in place that cuts across council agencies.</p> <p>EA1.1 The policy addresses language access to council services and programs.</p> <p>EA1.2 The policy includes training for staff on working with diverse populations.</p> <p>EA1.3 The policy ensures city information and community safety services, especially emergency and alert systems, are accessible in all relevant languages.</p> <p>Comment: This is a good example of language use (see the 'General Comments' section above). Recommend 'cuts across council areas, 'working with migrant populations' and 'municipal information'.</p> <p>Councils may find it challenging to implement the same language services policy across all of its areas, as some are externally funded. For example maternal and child health services and home support / community care programs for older people and those with disability (though both of these have their own language services funded by the State).</p> <p>Councils are generally not responsible for emergency and alert systems; these are a State government responsibility. Some councils may however distribute information provided by the State.</p>
90	Content	V0.16	<p>EA5 Partnership programs are in place to achieve equitable access to services for migrants.</p> <p>Comment: Please see thoughts on partnership programs in the above 'General Comments' section.</p>
91	Content	V0.16	<p>EA5.HE1 The partnership program provides information on health insurance options and promotes access to health insurance.</p> <p>Comment: The focus on health insurance is not as relevant in Australia as in the USA. Other than referring people to federal government advice, there may not be an organisation with whom councils could partner, and it's not appropriate for councils to partner with individual insurance companies. Some councils will also be reluctant to provide advice about Medicare.</p>
92	Content	V0.16	<p>EA5.HO.1 The partnership program promotes non-discrimination in housing regulations and tenant protections.</p> <p>Comment: Councils generally do not supply housing, get involved in tenancy regulations and protections or have much influence in these State / Federal based matters.</p>
93	Content	V0.16	<p>EA5.JU.1 The partnership program promotes access to justice in local court proceedings including access to legal advice</p> <p>Comment: While councils may be able to partner with State and/or Federal government, there are no 'local court proceedings' and councils do not provide legal advice. All court proceedings are State and/or Federal managed, including those at locations outside of major cities. Suggest removal of 'local' and consider reviewing.</p>
94	Content	V0.16	<p>EA5.JU.2 The partnership program promotes conflict resolution strategies such as mediation and faith-based options.</p> <p>Comment: This would depend on the partnering organisation's commitment to those options; councils do not provide conflict resolution but often partner with community legal centres and similar organisations.</p>
95	Content	V0.16	<p>CE1 A partnership program is in place to develop migrant knowledge of local council workings and advance migrant civic engagement.</p> <p>CE1.1 The partnership program provides information on civic engagement opportunities along with general information on the responsibilities of local councils.</p> <p>Comment: Councils can only provide knowledge on their workings and responsibilities, not the sector as a whole. Suggest clarification.</p>
96	Content	V0.16	<p>CE1.2 The partnership program supports migrant participation in public hearings and council meetings.</p> <p>Comment: Suggest deleting 'hearings' so that it reads 'public council meetings'. Victorian councils don't hold hearings as such, and not all council meetings are public.</p>
97	Content	V0.16	<p>CE1.3 The partnership program supports migrant participation on commissions and boards, and advances migrant civic leadership.</p> <p>Comment: Suggest clarification that 'commissions and boards' don't refer to ones led by council (there are none), or, if the intention is to increase migrant participation on council committees and advisory / reference groups, that these terms are used instead.</p>
98	Content	V0.16	<p>CE2 A partnership program is in place to support citizenship attainment. CE2.1 The partnership program provides information on process and eligibility, legal assistance, and testing and application support.</p> <p>Comment: Councils' involvement would be limited to referring people to DIBP and/or community legal centres (likely the only partners), and advising citizenship candidates of ceremony dates and processes.</p>
99	Content	V0.16	<p>CE3 A partnership program is in place to support eligible migrants in voting. CE3.1 The partnership program works with relevant local council and state agencies to eliminate barriers to voting for eligible migrants.</p> <p>Comment: Councils' involvement would be limited to advocacy, and referring people to the Australian or Victorian Electoral Commission (AEC or VEC) or any organisations funded for relevant projects. It doesn't seem appropriate for council to work with another local council (suggest removing this). Also suggest replacing 'state agencies' with 'State government' or AEC / VEC. There could be an example whereby councils work to ensure residents engage with council in consultations and by joining reference / advisory groups.</p>
100	Content	V0.16	<p>CE5 A partnership program is in place to address the unauthorised practice of immigration law and related fraudulent services.</p> <p>Comment: As above, councils' involvement would be limited to referring people to DIBP and/or community legal centres (likely the only partners) and promoting their services / Migration Agents Registration Authority information.</p>
101	Content	V0.16	<p>EE3 A partnership program is in place to support jobseekers, including migrant jobseekers, as well as businesses looking to attract diverse talent.</p> <p>Comment: Most of the indicators under this example would depend very much on whether the area has an appropriate organisation and/or willing business for council to partner with. For example, it is not in councils scope to provide employment counselling, address any discriminatory practices or poor conditions at other organisations, prepare or place migrants in jobs,</p> <p>The most councils could do in this space (and in EE5 and EE6) is promote the services of relevant organisations and resources, and perhaps some advocacy.</p> <p>However, there is opportunity for some of these indicators to be done where they specifically related to migrant employment at council, and the role of councils as an employer (as in GL6.2). For example networking and mentorship, traineeships, volunteering, educating human resource and other staff on the value of overseas work experience and cultural diversity, where job vacancies are promoted, how simple / culturally appropriate the recruitment process is (advertisements, selection criteria, interview format etc.). Suggest differentiation between 'at council' and general employment.</p> <p>There may also be opportunity for councils to encourage local businesses and organisations to follow their lead, increase economic activity in the municipality, address examples under EE4 (where these elements are in councils' scope), advocate to State / Federal government for improved employment services, and begin / improve / promote English language and literacy classes in community centres and neighbourhood houses (often in partnership).</p>
102	Content	V0.16	<p>EE7 A partnership program is in place to work with primary and secondary school systems to attain more equitable educational outcomes for migrant students.</p> <p>Comment: This would depend on whether the local primary and/or secondary schools have the interest and resources to undertake such a partnership; councils' role would be minimal. Perhaps this example can be reviewed to acknowledge the significant work of council youth services teams, including their support of migrant young people.</p>

103	Content	VO.16	<p>SC1 A policy is in place to ensure that safety services are provided in a culturally competent manner. SC1.1 The policy includes victim services. SC1.2 The policy includes code enforcement.</p> <p>Comment: This should perhaps be a partnership with Victoria Police. Councils have very limited scope and resources to provide safety or victim services, and none for 'code enforcement' (this implies responsibility for law enforcement, which Australian councils don't have; unlike USA councils).</p> <p>'Victim' needs clarification. Given the Standard's context it's assumed to mean a victim of racial or religious discrimination, however its mention with safety services could imply it means a victim of violence, disaster et cetera. If it were the former, councils role would be limited to referring people to organisations such as VEOHRC, the Dispute Settlement Centre of Victoria or State government managed emergency response services.</p>
104	Content	VO.16	<p>SC2 A program exists to train public safety staff in working with diverse populations.</p> <p>SC5 A program is in place to nurture connections between the migrant communities and the local police force.</p> <p>SC5.1 The program includes information sessions facilitated by the local police force on local law and legal processes to help migrant communities understand and appreciate their rights and obligations to instil confidence and a sense of a safe and connected community.</p> <p>SC5.3 The program includes encouraging the local police force to be present and participate in community settings and events.</p> <p>Comment: These should be a partnership program with Victoria Police, and/ or could involve training some council staff as volunteers / emergency relief pool staff. Councils may have some 'public safety' staff (for example parking, traffic and events staff), but none are police officers.</p> <p>Councils role in SC5.1 and SC5.3 respectively would be limited to promoting and/or hosting information sessions, and inviting the local police force to council led community events.</p>
105	Content	VO.16	<p>SC2.1 The program includes staff operating emergency response systems such as 000.</p> <p>SC5.2 The program includes training for police officers to understand the cultures that make-up the community.</p> <p>SC5.4 The program encourages recruitment of migrants for positions within the police force and / or as community liaisons.</p> <p>Comment: These are the responsibility of Victoria Police. Australian councils don't operate emergency response systems, train or recruit police officers. Suggest these examples be removed (they would be somewhat covered in the Leading Examples of Economic Development and Education).</p> <p>While councils have no role in emergency response, many have emergency management staff who play a role in resilience building, relief and recovery when it comes to disasters (for example fire or flood).</p>
106	Content	VO.16	<p>SC4.2 The policy addresses practices around birth, marriage, death and burial.</p> <p>Comment: These are the responsibility of Federal and/or State government. Suggest it be removed / done as a partnership program (councils likely limited to information provision).</p> <p>It is recommended that the SC examples be reviewed to reflect the roles of council parking, traffic, events and emergency management staff. There is benefit to training such staff in cultural competency and ensuring relevant policies and processes are culturally appropriate.</p>
107	Content	VO.16	<p>CM1 A program exists to identify possible sources of tension. CM1.1 The local council has a network of people and organisations from which good intelligence on possible sources of tension can be obtained. CM1.2 The intelligence is collected and assessed regularly.</p> <p>Comment: The term 'intelligence' may not be well received; it implies a law enforcement / counter terrorism perspective. Recommend 'engagement' and to clarify how regularly community should be consulted.</p>
108	Content	VO.16	<p>CM2 A program exists to provide professional mediation and other resources to deal with identified conflicts. CM2.1 The local council has access to trusted and skilled mediation resources that specifically or also deals with intercultural and interreligious issues.</p> <p>Comment: This should perhaps be a partnership program; councils are unlikely to have the resources or expertise, or see it as within their scope. Councils role may be limited to referring people to organisations such as VEOHRC or the Dispute Settlement Centre of Victoria (as for SC1.1). Or, the example could be reviewed to acknowledge the possibility for migrants to attend council meetings and participate in consultations and advisory / reference groups (where the issues relate to council matters). As it stands, it is too specific.</p>
109	Content	VO.16	<p>CM3 A partnership program exists to advise and support people who have faced discrimination.</p> <p>Comment: This too would depend on an interested and available partner, or only be VEOHRC (see SC1). Councils role would be limited to promoting their services.</p>
110	Content	VO.16	<p>CM4.1 The local council runs anti-discrimination campaigns or raises awareness in other ways.</p> <p>Comment: It would be useful to mention the Australian Human Rights Commission's 'Racism. It Stops With Me' campaign as such an example (many Victorian councils are part of this campaign).</p>
111	Content	VO.16	<p>P11 A program exists to encourage intercultural mixing in local council spaces including public libraries, schools and parks.</p> <p>Comment: Suggest removing 'schools'; they aren't council spaces and are managed by the State government.</p>
112	Assessment		<p>There is a reluctance for one council to audit another so it would perhaps be better for WA Local Govt Association to play a role in auditing councils here and likewise for other states.</p> <p>Overall, we like the maturity tab.</p>
113	Content	VO.16	<p>Concern from Councils that we hadn't put "more effort" into de-Americanising it, eg. still included things like police, elections, immigration etc. that Council here have no control over. There may already have been some damage done with LGAs due to this.</p>
114	Assessment	VO.16	<p>Liked the idea of shared practice opportunities with peer accreditation, however Councils had a real concern that they would be lumped with a Council they may not want to be. We discussed the idea of "matched" Councils being tailored to fit the needs and desires of both. Bianca stated that if this was made explicit then Councils would be happy with it.</p>
115	Content	VO.16	<p>Re: a "Welcoming Plan", if a Council already has a plan that includes the kinds of things that might go in a Welcoming Plan, will this other plan count, or will they have to create a whole new plan?</p>
116	Content	VO.16	<p>The general consensus was that overall, there are too many "unachievable" standards for Council and they fear they will never be able to reach them all. concern that very few Councils, even the "best" ones, will ever get past the first level on the matrix (in particular due to the issues re: police, mediation, housing, immigration etc. that they have no control over)</p>
117	Assessment	VO.16	<p>Who will the auditors be?</p>
118	Assessment	VO.16	<p>Do population size, diversity, resettlement numbers etc. get taken into account with the audit? How will these variances be accounted for? Some councils for example, find it very difficult to do the partnerships aspects as those partnerships are simply not there (regional cities for example)</p>
119	Content	VO.16	<p>Reconsider the word "Maturity" as it implies immaturity. Use "Engagement" instead perhaps.</p>
120	Content	VO.16	<p>Remove the words "audit and auditor" and replace with "assessment and assessor". There is a fear about the idea of "auditing" as it implies legislative and financial issues.</p>
121	Content	VO.16	<p>The term "diversity" is throwing people off as it does not here include LGBTI, disability etc. Use "cultural diversity" instead to clarify.</p>
122	Content	VO.16	<p>If the Standard is for Council, why have any guidelines/standards that are not for Council at all – Councils were very concerned about this and did not like it at all.</p>

123	Content	V0.16	There is a concern re: the clarity of roles around Council vs. Service Providers in that SP's may not be aware of other initiatives like Intercultural Cities, Refugee Inclusion Zones etc., and may start to push Council to take on WC when it's not their place to do so (Bianca stated that this was to our credit as we have promoted the program well, but that it's still an issue Council are concerned with)
124	Content	V0.16	What happens when LGA's are doing broader intersectional diversity work, but this isn't included in the Standard? How can they be seen to be reaching the Standard when they may be doing these things but they may just not be named in a way that aligns with the Standard?
125	Content	V0.16	Is there space in the Standard for a program to be using some kind of "migrant lens" when working on a "mainstream" program? Can we ensure that if a program isn't specific to migrants but is inclusive, that it can be incorporated into the Standard for a council.
126		V0.16	GL 11 - GL11 A comprehensive monitoring system is established to measure social, economic and civic outcomes for migrants, as well as monitoring and evaluating the plans and programs established through the rest of this standard. Attitudes of the receiving community towards migrants should also be measured over time.
127	Content	v1.0	<p>the National Settlement Framework is a high level structural blueprint for Commonwealth, State and Territory and Local Government, to work in partnership to effectively plan and deliver services that support the settlement of migrants and new arrivals in Australia. The Framework sets out focus areas for the three tiers of government to regularly engage and work together in partnership on, and to collaborate with stakeholders.</p> <p>Governments and stakeholders are guided by the structures and initiatives in this Framework to make planning decisions on the provision of settlement and support services and to deliver coordinated, client-centric services, informed by research and evaluation.</p> <p>The National Settlement Framework was developed by the Federal government in consultation with all State and Territory Governments; and the ALGA.</p> <p>See: https://www.dss.gov.au/settlement-and-multicultural-affairs/publications/national-settlement-framework</p>
128	Content	v1.0	<p>General Comments:</p> <ul style="list-style-type: none"> • We need to be mindful of the costs imposed of the Standard on councils and sensitive to the challenge this presents for many cash-strapped councils. • There is a general concern in the local government sector about what is commonly referred to as "cost shifting"; that is the unilateral transfer of roles and services previously provided by State and federal governments to local government without accompanying resources. • Beyond that, we need to be cautious about compounding this situation by ourselves presuming that local councils should provide services already being provided by others. For example, DSS nationally funds various organisations (MRCs etc) to deliver settlement information - should councils double-up or just make a referral? (eg. LC3 on p.12 refers). [Updated] <p>Specific Comments:</p> <ul style="list-style-type: none"> • As previously advised, we should reference the National Settlement Framework; and for Victoria we need to be mindful of the VMC's Settlement Coordination Unit. I think there is still an OMAC Inter/Intra "Victorian Settlement Planning Outcomes Committee" which we ought to engage stakeholders through. • Referring to municipal authorities as "local governments" is not common usage within the sector. While the sector collectively is referred to as "Local Government"; individual municipal authorities are referred to as "councils", "local councils", shires or municipal authorities. - nomenclature is good and consistent through most of the document but we still refer to "local governments" under Knowledge Sharing on p.4. • Maybe we should just define a local council as the municipal authority for a local government area (LGA); its unlikely that individual towns, cities, regions and districts within an LGA will seek to participate in Welcoming Cities independently of their local council. • Multicultural Arts Victoria are very supportive but keen for us to explicitly recognise the central role of an inclusive council arts and culture program to developing Welcoming Cities. • EA3 on p.9: Health, Public Housing and Transport services are largely provided by or through State Government in Victoria; current text implies they are private sector? • EE3 on p. 16: Councils are not generally employment services providers; certainly not a job placement service provider. A&E advocacy to existing service providers - particularly those funded by State & Federal governments - would be a more appropriate role for councils. Likewise others have carriage of things like workers rights, OH&S etc - we need to be careful not to be seen to be recommending duplication of service delivery which others are likely to push-back on. • SC5 on p. 20: VicPolice has carriage of cultural competency training for their own members - not a council responsibility; likewise for recruitment policy etc - we need to be clearer that the local government role is through A&E advocacy; not primary carriage of achieving an outcome.
129	Content	v1.0	Review and reference The Australian Standard for Intercultural Cities
130	Content	v1.0	Some of the language is read as exclusive rather than inclusive and is perceived to privilege migrants over established residents. e.g. EE4 - The local council advances migrants in starting, building and growing businesses (this is viewed as unfairly privileging one group rather than what would be considered broader social cohesion).
131	Content	v1.0	Consider and reference the Standard against the 10 elements of inclusion / inclusive cities:
			<p>Civic Inclusion Cultural Inclusion Economic Inclusion Educational Inclusion Health Inclusion Political Inclusion Role of Media Social Inclusion Spatial Inclusion Welcome Ability</p>
132	Content	v1.0	Consider report: THE ROLE OF CULTURE IN PROMOTING INCLUSION IN THE CONTEXT OF MIGRATION (September 2016)
133	Content	v1.0	Review and reference the final Welcoming America Standard

134	Content	v1.0	<p>Draft migrant disability extra items for Welcoming Communities</p> <p>Note: This material uses the term "migrant" in the same way it is used in the proposed Australian Standard for Welcoming Communities, to denote overseas-born people of any immigration status including refugees and asylum seekers.</p> <p>EA3.7 Council ensures its facilities and services are accessible to people with a disability. It makes a point of informing new migrants of their availability, and how to gain access.</p> <p>EA3.8 Council works with appropriate local medical and community organisations to provide migrants with mental illness with help to overcome their condition and, as far as possible to take full part in community life. In particular, it offers help to those struggling to integrate as a result of PTSD or similar conditions arising from the asylum seeking process .</p> <p>EA3.9 Council works energetically with appropriate local organisations to counter misinformation about particular migrant groups, and overcome any wider community hostility towards them</p> <p>EA 3.10 If necessary, Council collaborates with local medical and community organisations to counter community beliefs about physical and mental disability that result in people with those conditions being denied suitable medical help or being subject to community neglect or hostility based on erroneous beliefs.</p>
135	Content	v1.0	<p>Consider these references in relation to the inclusion of guidelines and indicators related to arts and cultural development.</p> <p>http://www.culturaldevelopment.net.au/planning/more-information/ http://www.culturaldevelopment.net.au/planning/</p>
136	Content	v1.0	<ul style="list-style-type: none"> • We have an inclusion framework and all our inclusion plans, including the Multicultural Plan, follow a consistent structure. Therefore I think the preference will be to do a Multicultural Plan that retains the consistent structure rather than a Welcoming Plan and then have a translation document that explains how the Multicultural Plan satisfies all the requirements of the Welcoming Cities standards. We are doing the same thing for our reconciliation plan. We will be interested to discuss the easiest way of doing this. • The standards and indicators are really exhaustive and I have been told that all the indicators for the first four standards will be mandatory in order to reach the level of advancing. The list is really prescriptive and there may be many Councils doing really good work that may not satisfy all the indicators – for example EA3 and EE3 are very prescriptive and exhaustive. If you compare it to the reconciliation action plan structure, there is a lot less flexibility – the RAP structure has a couple of mandatory requirements but then the other actions are suggested as examples. I think similarly that the indicators should not all be mandatory – perhaps it could be mandatory to meet each 'category' level in some way but not each 'indicator'. Does that make sense? • The other concern about having so many indicators is that the reporting and auditing would be a significant administrative burden and quite difficult to track and monitor so many actions. Our current multicultural plan has 31 actions whereas the Welcome Plan has something like 80 actions • In the Equitable Access section, EA1 could be expanded to be broader than just language access. Council's may also provide access to facilities and halls, subsidised access to leisure centres, community grants. • There needs to be a section around Cultural Arts and celebrations of days of cultural and religious significance
137	Content	v1.0	<p>Thanks for the work on the Australian Standard. I wanted to provide some specific feedback on CE3</p> <p>The local council supports eligible migrants in voting This can be demonstrated by: CE3.1 Working with relevant local council and state government to eliminate barriers to voting for eligible migrants</p> <p>With all the focus on citizenship law changes this is a really crucial area, and one where LG can provide an opportunity for people to engage in civic activity and democracy before they become citizens.</p> <p>I think the item you have written here could be a bit stronger / more specific. I think it should say something like "that all city residents be allowed to and encouraged to enrol to vote in local government elections."</p> <p>In Tasmania residents who are not citizens can vote in local government elections but it's a tricky and fairly unfriendly process to be listed on the 'General Managers Roll'. There is also quite a bit of political scepticism about whether non-citizens should be allowed to vote, so its worth making this a matter of important principal.</p> <p>Many of the best, most inclusive cities around the world do make a point of allowing all residents to vote. Alphonse wrote a <u>submission on this topic a few years ago and it has some good information – attached.</u></p>
138	Content	v1.0	<p>We only have two very small points of feedback as follows:</p> <p>On page 12, point LC5.1 currently states 'identifying and addressing barriers in processes or systems that may limit inclusion'. Please give consideration to including the word 'diversity' at the end of this sentence. We believe that the two concepts go hand in hand and that we want to achieve both. Sometimes inclusion can be achieved at the expense of diversity.</p> <p>On page 20 please consider changing all reference to 'police force' instead to 'police service'. We believe that the term 'force' sends the wrong message about police and their role in the community and could inhibit the building of trust between police and community.</p> <p>Congratulations to you and your team on a great document. We look forward to continuing to work with you and local councils to achieve Welcoming Cities!</p>

139	Content	v1.0	<p>The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body representing Australia's culturally and linguistically diverse (CALD) communities and their organisations. FECCA provides advocacy, develops policy and promotes issues on behalf of its constituency to Government and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from diverse cultural and linguistically diverse backgrounds are given proper recognition in public policy.</p> <p>FECCA supports multiculturalism, community harmony, social justice and the rejection of all forms of discrimination and racism so as to build a productive and culturally rich Australian society. FECCA's policies are developed around the concepts of empowerment and inclusion and are formulated with the common good of all Australians in mind.</p> <p>Key Message FECCA welcomes the opportunity to provide feedback on the Australian Standard for Welcoming Cities (Public Draft v1.0) document. Firstly, we congratulate and welcome the important Welcoming Cities initiative. FECCA believes that this initiative is a positive step in creating cohesive, more inclusive communities.</p> <p>FECCA supports an accreditation framework for ensuring best practice in efforts to promote cultural diversity and inclusion such as that proposed in the Australian Standard for Welcome Cities. The Welcoming Cities program and the Standard will underpin initiatives by local councils involved in this program and provide an objective yardstick for measuring success. For this reason, FECCA warmly welcomes the Australian Standard for Welcoming Cities document.</p> <p>The goals of the Welcome Cities initiative and the Australian Standard for Welcoming Cities reflects and builds on the continuing work of FECCA and its constituent members across Australia's states, territories and regions and we congratulate the Welcoming Cities organisation for their ongoing work and the production of this draft Standard.</p> <p>Categories Leadership and communication FECCA believes that the list of guidelines and indicators under the Leadership and Communications section will assist in advancing "migrant-friendly communications, policies, programs and initiatives and institutionalise these efforts." These include:</p> <ul style="list-style-type: none"> · Designating a role or roles of which the focus includes migrant inclusion work · Strengthening the collaborative work of Community Based Organisations doing migrant inclusion work · Promotes the employment of a council workforce that is inclusive and culturally diverse
140	Comments	v.1.0	<ul style="list-style-type: none"> · Is Welcoming Cities a mandatory framework for Local Government? · Darebin Council already have policies, programs and actions in regard to building an inclusive city. · Will Welcoming Cities replace existing policy frameworks? · WC can help embed planning and practice for cultural diversity and inclusion across the organisation in a systemic way. · It is positive to have standards for inclusive cities we can all share across government to ensure ongoing development and progress. · WC could be tokenistic if signing up becomes symbolic. Internal governance and leadership is required to drive the process on an organisational basis. · Other 'friendly' frameworks have been promoted for Local Government to consider. It is confusing. How do they all fit together? · WC complements existing policies. It's not aimed at replacing current good practice. · Access to information resources, advice and networks can be helpful and useful. · There are knowledge gaps and limited capacity in regard to the design and delivery of inclusive programs and services. Most services are 'universal'. WC can help guide planning and practice in this regard. · Standards can provide for an effective orientation tool to guide practice in the organisation to build an inclusive city. · Having standards can help to set some benchmarks and indicators to measure impact of our work. · Who will drive this process internally? Will there be a Committee? · Does the standard include other tiers of diversity? It appears that it focuses on just cultural diversity. · Standards need to be considered in light of the specific needs and issues of a particular municipality. Some standards might not apply in some settings. Does this mean that particular City will not be considered inclusive? · Standards and assessment categories are fine in terms of process to guide the development of a Welcoming Plan. However it is not clear how internal decision making processes in Council would fit with WC's own assessment process and in particular with the engagement of an 'external assessor'. The way it reads sounds like a procurement process. · Standards are well grouped and logically structure to ensure systemic response to cultural diversity and inclusion. · Council has other internal and external tools already to assist with policy development and practice. · The standards required political support and leadership in Council so it becomes part of everyday practice. · Is it same old? What is 'new' that they are contributing? · I still don't know 'who' they are- feels like a consultancy organisation trying to fill in a certain gap and I am not sure Darebin has the gap – the Equity Inclusion policy and EIPAT and all the Action plans were meant to do all that...there has been resistance for a whole range of complex reasons internally, I am not sure that an outside organisation can come and do our work I don't think that is the answer to a systemic, whole- of- Council advocacy, policy and practice. Local government seems good at giving away its responsibility to act. · Where are the intersections of disadvantage and discrimination here too? I am not sure that giving it to others to do
141	Content	v1.0	ph
142	Comment	V0.16	Interested in Welcoming Cities, rate themselves highly on a self-assessment model
143	Content	v1.0	See separate document (too large to include here).
144	Content	v.1.0	See separate document (too large to include here).
145	Assessment	v1.0	Names
146	Tool Kit	v1.0	<p>Need to develop a communications toolkit and self-assessment tool / progress tracker.</p> <p>To include case studies, example of leading practice.</p> <p>Develop Exec. summary / high level table/diagram to tie the outcome areas together.</p> <p>Does it require a training module?</p>

147	Content	v1.5	<p>1.0 Leadership</p> <p>Welcoming Cities acknowledge and pay respect to the traditional custodians and ancestors of this country, and the continuation of their cultural, spiritual and ceremonial practices.</p> <p>We respectfully acknowledge the past, present and future traditional owners of the land, the Aboriginal and Torres Strait Islander peoples, the traditional custodians of this land, and respect their culture and identity which has been a continuum with the land and sea for generations.</p> <p>Welcoming Cities will engage local Aboriginal and Torres Strait Islander people as leaders in welcoming activities.</p> <p>Welcoming Cities recognise the importance of cultural diversity and inclusion and seek to advance that work through collaboration and partnership across council, the local community and other government agencies.</p> <p>Welcoming Cities through engagement with receiving communities will promote understanding who their new neighbours are and why welcoming work is important; bringing together the voices and experiences of both receiving and migrant communities in defining a welcoming agenda and platform.</p> <p>1.1 The local council recognise Aboriginal and Torres Strait Islander people as the First Peoples of this Nation and will work to engage local Aboriginal and Torres Strait Islander communities in welcoming work.</p> <p>Demonstrated by:</p> <p>1.11 Actively working towards reconciliation with Aboriginal and Torres Strait Islander people and communities.</p> <p>1.12 Formally acknowledging Traditional Owners through collaboration with elders past, present and future as the original custodians of the land in policies, initiatives and public events.</p> <p>1.13 Facilitating dialogue between the Traditional Owners through collaboration with elders past, present and Future and migrant communities.</p> <p>2.0 Social & Cultural Inclusion</p> <p>2.5 The local council is committed to embedding broader diversity and inclusion approaches across the organisation recognising that there are often additional barriers to social inclusion faced by Aboriginal and Torres Strait Islanders, women from migrant backgrounds, people living with disability, and/or people who identify as LGBTI.</p> <p>Demonstrated by:</p> <p>2.51 Cross-council initiatives and strategies that address barriers to access and inclusion in policy and practice, across a range of areas such as disability, mental health, cultural diversity, and gender diversity.</p> <p>6.0 Places & Spaces</p> <p>6.3 The local council works to recognise and reflect Aboriginal and Torres Strait Islander and multicultural heritage in public spaces and facilities.</p> <p>Demonstrated by:</p> <p>6.31 Supporting initiatives that identify and communicate the significance of cultural stories in public spaces and facilities.</p>
18 21	Content	V0.16	<p>Principle 1 - Agree with this principle, but what about aspiring to take it even further? Connecting newcomers to indigenous people in their own contexts, as part of welcoming? Introducing newcomers to indigenous culture and language?</p> <p>GL1.4 - Seek opportunities to link newcomers with First Peoples.</p>
62 63	Accreditation	V0.16	<p>The initial online self-assessment tool should be simple, and not onerous. Clarification is needed on whether the level of additional work during and after accreditation.</p> <p>It seems that a self-assessment based model is preferred, and a self-audit tool which, based on the results, provides suggestions, strategies and project ideas for increasing activity and outcomes in developing a welcoming city.</p>