

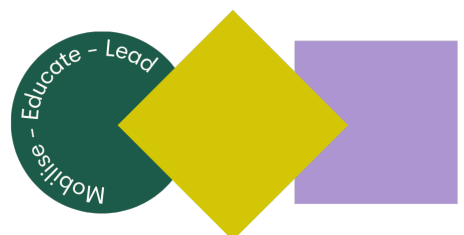


**Forcibly Displaced
People Network**

**Submission to the Department of Home Affairs
in response to the Discussion Paper
Australia's Humanitarian Program 2025-26**

6 August 2025

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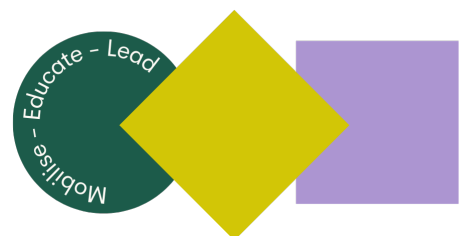
About Forcibly Displaced People Network

The Forcibly Displaced People Network (FDPN) is Australia's only national organisation led by LGBTIQ+ people with lived experience of forced displacement. We work to close systemic gaps in access to safety, services, and inclusion, grounded in evidence, lived expertise, and community leadership. For more information visit <http://fdpn.org.au/>.

We thank the Department of Home Affairs for the opportunity to provide input into the 2025–26 Humanitarian Program and for identifying LGBTIQ+ forcibly displaced people as a priority cohort.

Summary of recommendations

1. Increase the overall size of the offshore Humanitarian Program to respond to both acute emergencies and chronic displacement, particularly in under-resourced regions.
2. Introduce of dedicated percentage for LGBTIQ+ individuals across all protection visa categories and community sponsorship programs.
3. Allocate a minimum of 3% of the total Humanitarian Program spaces as quarantined for LGBTIQ+ people, with a longer-term target of 6 to 10%.
4. Embed community-led triage and referral mechanisms to expand safe access to protection beyond UNHCR referrals, including NGO referrals and self-referrals, in line with the 2021 Global Roundtable and UN IE SOGE recommendations.
5. Ensure pathways to resettlement are inclusive by design, with reforms to visa criteria, documentation requirements, and definitions of family to reflect the realities of LGBTIQ+ relationships impacted by criminalisation and non-recognition.
6. Establish partnerships with LGBTIQ+ community-led and in particular LGBTIQ+ refugee-led organisations to act as Approved Proposing Organisations (APOs) or introduce an alternative model that enables safe and trusted sponsorship.
7. Ensure that financial barriers to access CSP are levelled or subsidised, particularly for systemically marginalised applicants and community sponsors.
8. Implement dedicated LGBTIQ+ quotas across visa categories, including emergency and protracted streams.
9. Scale up NGO- and community-led referral pathways, particularly for those unable to register safely with UNHCR or engage in national protection systems.
10. Ensure coordination efforts with regional partners explicitly address the needs of LGBTIQ+ populations.



- 11.** Prevent systemic deprioritisation of marginalised groups during large-scale or crisis-driven reallocations.
- 12.** Temporarily suspend new CSP applications to allow for a full and transparent program review, informed by refugee communities and specialist organisations.
- 13.** Redesign CSP to explicitly prioritise individuals with intersectional and compounded risks, including LGBTIQ+ people, stateless persons, people with disabilities, and those facing compounded marginalisation.
- 14.** Adapt or remove job-readiness criteria which currently disadvantage people impacted by displacement, exclusion from education, or legal persecution.
- 15.** Reduce or subsidise application and administration fees through means-tested models to increase accessibility.
- 16.** Mandate that Approved Proposing Organisations demonstrate cultural safety, human rights compliance, and LGBTIQ+ inclusion as a condition of government accreditation. This must include ensuring at least one APO is recognised by and accessible to LGBTIQ+ communities.
- 17.** Authorise civil society and refugee-led organisations (RLOs) to identify and refer applicants into humanitarian and resettlement pathways;
- 18.** Ensure these referrals lead to permanent resettlement, including through CRISP and community sponsorship models;
- 19.** Prioritise applicants facing layered and compounding vulnerabilities, LGBTIQ+, HIV status, and disability;
- 20.** Embed LGBTIQ+-inclusive, trauma-informed settlement support immediately upon arrival.
- 21.** Mandate the involvement of LGBTIQ+ refugee-led organisations in the design, implementation, and review of all complementary pathway programs.
- 22.** Change eligibility frameworks to account for structural inequalities and lived barriers to access.
- 23.** Develop dedicated initiatives that create inclusive opportunities for labour mobility, education, and training in partnership with trusted civil society organisations.



Introduction: Addressing Structural Exclusion

While we support the guiding principles of the Humanitarian Program, our experience shows that it does not yet deliver safe, equitable, or accessible pathways for many LGBTIQ+ forcibly displaced people. This cohort continues to face systemic exclusion across all program components. Barriers include visa categories that do not reflect lived realities, documentation requirements that are unattainable for those fleeing persecution¹, protection procedures that rely on biased western perception of credibility assessments², and highly restricted access to family reunification³.

LGBTIQ+ people are often invisible in protection systems. Many are unable to register with UNHCR due to fear of exposure, discrimination, or violence⁴. Others are deprioritised due to the absence of dedicated referral mechanisms and procedural safeguards. Even when resettled, many remain excluded from mainstream services and refugee communities⁵. Critical needs including safe housing, mental health support, and safety are routinely unmet.

Recognition of LGBTIQ+ protection needs has lagged behind lived experience. While countries like Australia and Canada began recognising sexual orientation and gender identity as grounds for asylum in the 1990s, it took 18 years for UNHCR to issue its first guidance in 2008. This delay reflects the broader pattern of institutional neglect and systemic failure.

In today's geopolitical context, LGBTIQ+ forcibly displaced people face intensifying risks. The 2024 Unveiling Subversive Power report⁶ by the Justice for Prosperity Foundation and IPPF documents the rise of anti-rights movements in the Asia-Pacific. These groups, often supported by foreign states and religious actors, are weaponising cultural narratives to undermine sexual and reproductive health and rights (SRHR), criminalise LGBTIQ+ identities, and erode democratic institutions⁷. Case studies from Vanuatu, Malaysia, and Indonesia expose how systemic disinformation and legal repression target already marginalised communities.

In this context, Australia must guarantee that LGBTIQ+ refugees remain a resettlement priority, similar to the existing Women at risk program. Meeting this obligation requires more than

¹ Reid, A/HRC/59/43: Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity in Relation to Forced Displacement - Report of the Independent Expert on Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity, para 58, 83

² A/HRC/59/43: Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity in Relation to Forced Displacement - Report of the Independent Expert on Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity, para .67

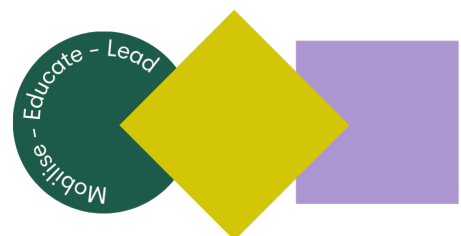
³ Matthieu, *Developing Safe and Legal Routes for LGBTQI+ Refugees. An Overview of the Situation in Germany, France and Italy.*

⁴ Reid, A/HRC/59/43: Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity in Relation to Forced Displacement - Report of the Independent Expert on Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity. Para 55, 56-59, 60-62, 63-66

⁵ Cochrane et al., *Inhabiting Two Worlds At Once. Report into LGBTIQ+ Settlement Outcomes; TOWARDS FAIRNESS A Multicultural Australia for All.*

⁶ IPPF and Justice for Prosperity, *Report: UNVEILING SUBVERSIVE POWER: Shedding Light on Anti-Rights Actors in the Asia-Pacific Region.*

⁷ McEwen and Narayanaswamy, *The International Anti-Gender Movement Understanding the Rise of Anti-Gender Discourses in the Context of Development, Human Rights and Social Protection.*



recognition. It demands bold, rights-based policy responses: inclusive visa frameworks, community-led referral mechanisms, and operationalised prioritisation based on compounding risks.

To meet its stated commitments, Australia must continue embedding the meaningful participation of structurally excluded groups in all aspects of refugee policy and implementation. This includes co-designing programs, resourcing community-led solutions⁸, and dismantling systemic barriers. The risks LGBTIQ+ people face are not incidental—they are systemic, compounding, and life-threatening. These risks require deliberate and urgent responses, such as community-led referral models, prioritisation mechanisms grounded in equity, and structural reforms that align with Australia's stated values and protection obligations.

Responses to consultation questions

1. Composition of the 2025–26 Program

The composition of Australia's Humanitarian Program must be guided by one core principle: protection must be accessible to those most at risk. This means the focus should not be solely on the numerical distribution between visa categories, but on whether the program as a whole delivers equitable, safe, and inclusive access to protection especially for systemically excluded cohorts like LGBTIQ+ forcibly displaced people.

FDPN recommends that the Australian Government:

1. Increase the overall size of the offshore Humanitarian Program to respond to both acute emergencies and chronic displacement, particularly in under-resourced regions.
2. Introduce of dedicated percentage for LGBTIQ+ individuals across all protection visa categories and community sponsorship programs.
3. Allocate a minimum of 3% of the total Humanitarian Program spaces as quarantined for LGBTIQ+ people, with a longer-term target of 6 to 10%. This approach would give meaningful effect to the Australian Government's stated commitment to LGBTIQ+ refugee protection and in recognition of their disproportionate risk and systemic exclusion.

⁸ TOWARDS FAIRNESS A Multicultural Australia for All.



4. Embed community-led triage and referral mechanisms to expand safe access to protection beyond UNHCR referrals, including NGO referrals and self-referrals, in line with the 2021 Global Roundtable⁹ and UN IE SOGE recommendations¹⁰.
5. Ensure pathways to resettlement are inclusive by design, with reforms to visa criteria, documentation requirements, and definitions of family to reflect the realities of LGBTIQ+ relationships impacted by criminalisation and non-recognition.¹¹
6. Establish partnerships with LGBTIQ+ community-led and in particular LGBTIQ+ refugee-led organisations to act as Approved Proposing Organisations (APOs) or introduce an alternative model that enables safe and trusted sponsorship.
 - 6.1. Currently, none of the APOs under the Community Support Program (CSP) are LGBTIQ+ affirming or recognised as trusted by LGBTIQ+ refugee communities. Without structural reform, the CSP will continue to be inaccessible or even harmful to LGBTIQ+ applicants, reinforcing exclusion from protection pathways.
7. Ensure that financial barriers to access CSP are levelled or subsidised, particularly for systemically marginalised applicants and community sponsors.

These recommendations reflect Australia's existing international commitments made under the Global Compact on Refugees, including:

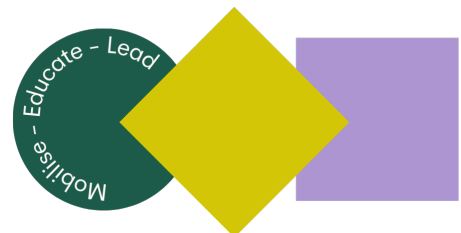
- **GRF-07517**, which commits to integrating diverse refugee perspectives into settlement policy and service design;
- **GRF-08280**, which advances localisation by supporting leadership of refugee-led organisations;
- And **GRF-08279**, which pledges to prevent and respond to gender-based violence through direct partnerships with affected communities.

LGBTIQ+ forcibly displaced people face criminalisation, sexual violence, social isolation, and prolonged legal and social exclusion in countries of asylum. These are not episodic risks, but chronic

⁹ UNHCR and by the Mandate of the United Nations Independent Expert on Protection Against Violence and Discrimination Based on Sexual Orientation and Gender Identity (IE SOGI), 2021 Global Roundtable on Protection and Solutions for LGBTIQ+1 People in Forced Displacement.

¹⁰ Reid, *A/HRC/59/43: Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity in Relation to Forced Displacement - Report of the Independent Expert on Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity*.

¹¹ Matthieu, *Developing Safe and Legal Routes for LGBTIQ+ Refugees. An Overview of the Situation in Germany, France and Italy.*; Reid, *A/HRC/59/43: Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity in Relation to Forced Displacement - Report of the Independent Expert on Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity*.



and compounding ones. They require not only flexible responses to global emergencies but also durable solutions for structurally excluded populations. The Humanitarian Program must be equipped to do both.

Australia's commitments to refugee inclusion and localisation must be operationalised through measurable, inclusive, and community-informed reforms that prioritise those most at risk. This is what it means to deliver on a protection mandate.

2. Balancing Crises and Protracted Situations

"LGBTIQA+ people are the first to be executed and the last to be evacuated."

FDPN Community member

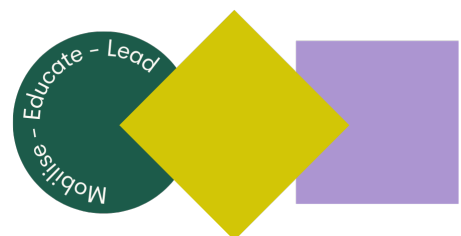
While responsiveness to global emergencies is essential, it must not come at the expense of those experiencing entrenched and compounding risks. LGBTIQA+ forcibly displaced people consistently face criminalisation, targeted violence, and social exclusion, yet remain under-prioritised in both emergency and protracted resettlement responses.

Australia's Humanitarian Program must not treat these risks as secondary or optional. Instead, it should embed prioritisation for structurally excluded cohorts across all protection pathways.

FDPN recommends that the Australian Government:

- 8.** Implement dedicated LGBTIQA+ quotas across visa categories, including emergency and protracted streams.
- 9.** Scale up NGO- and community-led referral pathways, particularly for those unable to register safely with UNHCR or engage in national protection systems.
- 10.** Ensure coordination efforts with regional partners explicitly address the needs of LGBTIQA+ populations.
- 11.** Prevent systemic deprioritisation of marginalised groups during large-scale or crisis-driven reallocations.

These priorities are aligned with Australia's pledges under GRF-08280 (localisation), GRF-08279 (gender-based violence), and GRF-07517 (refugee perspective integration), as well as the



recommendations of the 2021 Global Roundtable¹² and UN IE SOGE report¹³. They also reflect obligations under international human rights law to provide protection without discrimination.

Refugee programs must not only respond to immediate displacement, but address long-standing structural exclusion. This includes supporting community-led solutions, building trusted partnerships, and ensuring that durable protection is accessible to those most at risk, not just those easiest to process.

3. Reforming the Community Support Program

The Community Support Program (CSP) is currently inaccessible to most LGBTIQ+ people due to job-readiness criteria, high financial costs, and structural assumptions that exclude those without privilege, documentation, or immediate workforce entry capacity.

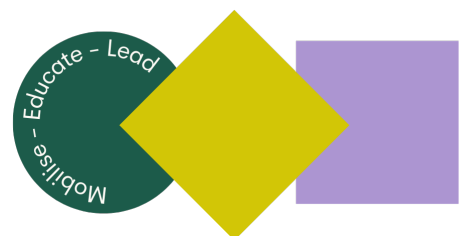
FDPN supports the continuation of a named or linked sponsorship pathway within Australia's Humanitarian Program. However, the current CSP design centres on able-bodied, job-ready applicants with English proficiency, formal education, and the capacity to achieve self-sufficiency within 12 months. These assumptions ignore systemic barriers and reinforce exclusion.

FDPN recommends that the Australian Government:

- 12.** Temporarily suspend new CSP applications to allow for a full and transparent program review, informed by refugee communities and specialist organisations.
- 13.** Redesign CSP to explicitly prioritise individuals with intersectional and compounded risks, including LGBTIQ+ people, stateless persons, people with disabilities, and those facing compounded marginalisation.
- 14.** Adapt or remove job-readiness criteria which currently disadvantage people impacted by displacement, exclusion from education, or legal persecution.
- 15.** Reduce or subsidise application and administration fees through means-tested models to increase accessibility.
- 16.** Mandate that Approved Proposing Organisations demonstrate cultural safety, human rights compliance, and LGBTIQ+ inclusion as a condition of government accreditation. This must include ensuring at least one APO is recognised by and accessible to LGBTIQ+ communities.

¹² UNHCR and by the Mandate of the United Nations Independent Expert on Protection Against Violence and Discrimination Based on Sexual Orientation and Gender Identity (IE SOGI), 2021 Global Roundtable on Protection and Solutions for LGBTIQ+1 People in Forced Displacement

¹³ Reid, A/HRC/59/43: *Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity in Relation to Forced Displacement - Report of the Independent Expert on Protection against Violence and Discrimination Based on Sexual Orientation and Gender Identity.*



The CRISP model has demonstrated stronger alignment with protection goals. It is more affordable, flexible, and inclusive of applicants who are not immediately job-ready. FDPN's partnership with CRSA under CRISP shows that when community sponsorship is co-designed and supported by LGBTIQ+ organisations, it can be both safe and transformative.

If the CSP is to serve its humanitarian purpose, it must be restructured to remove discriminatory barriers and reflect Australia's values of equity, fairness, and protection for those most at risk.

4. Emergency Response and Community-led Pathways

Australia must operationalise a rights-based approach to emergency response by creating scalable, rapid-access pathways for individuals facing acute protection risks. This includes those at risk of criminalisation, torture, forced exposure, and other forms of targeted violence on the basis of sexual orientation, gender identity, gender expression, or sex characteristics.

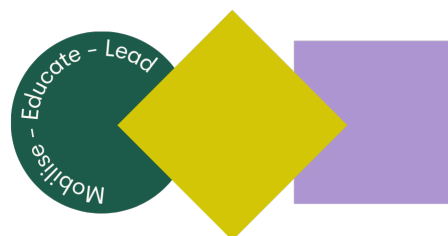
FDPN recommends that the Australian Government:

- 17.** Authorise civil society and refugee-led organisations (RLOs) to identify and refer applicants into humanitarian and resettlement pathways;
- 18.** Ensure these referrals lead to permanent resettlement, including through CRISP and community sponsorship models;
- 19.** Prioritise applicants facing layered and compounding vulnerabilities, LGBTIQ+, HIV status, and disability;
- 20.** Embed LGBTIQ+-inclusive, trauma-informed settlement support immediately upon arrival.

Australia's Humanitarian Integration and Settlement Program must be co-designed with LGBTIQ+ forcibly displaced people, consistent with GRF-07517 and the Outcomes Framework. FDPN's [*Roadmap for Action on achieving LGBTIQ+ asylum and migration justice*](#) provides detailed, community-informed recommendations for ensuring inclusive settlement systems.

5. Complementary Pathways

Complementary pathways must be expanded and redesigned to be truly accessible. Currently, many LGBTIQ+ people are excluded due to systemic barriers such as criminalisation, lack of identity documentation, and exclusion from education or formal employment that render them ineligible under standard requirements.



With the rollback of civil society referral mechanisms in the United States and a shrinking global protection space, Australia has a unique opportunity and responsibility to lead by example. The Humanitarian Program must centre the needs of those most excluded and ensure that emergency response frameworks are grounded in equity, safety, and the leadership of affected communities.

FDPN recommends that the Australian Government:

- 21.** Mandate the involvement of LGBTIQ+ refugee-led organisations in the design, implementation, and review of all complementary pathway programs.
- 22.** Change eligibility frameworks to account for structural inequalities and lived barriers to access.
- 23.** Develop dedicated initiatives that create inclusive opportunities for labour mobility, education, and training in partnership with trusted civil society organisations.

In conclusion, it is essential that the government recognises the role and formally engages LGBTIQ+ refugee-led organisations in the design, delivery, and review of all humanitarian programs. These partnerships are essential to ensure that complementary pathways are inclusive, grounded in lived realities, and able to identify and respond to structural inequalities that may not be visible to those without direct experience of displacement or persecution.

Once again, thank you for the opportunity to make a submission. FDPN looks forward to engaging with the Department of Home Affairs further on these matters.

Sincerely,

Renee Dixon

Co-founder, Executive Director | Forcibly Displaced People Network

