



AMEP and SEE Program Evaluations
ACIL Allen Consulting
9/60 Collins Street
Melbourne
19 December 2014

Dear Martin,

The Australian Council of TESOL Associations (ACTA) is pleased to present its submission to the AMEP and SEE Evaluations 2014.

As the national body representing the professional concerns of teachers of speakers of English as an Additional Language or Dialect (EAL/D), ACTA is duly placed to respond to this submission. This document was prepared in consultation with ACTA councillors and selected State and Territory association members who possess extensive and long-standing expertise in English language and literacy education for adult learners.

We would greatly welcome the opportunity to consult further with ACIL Allen Consulting and the Department of Industry, and to collaborate in the planning, development and implementation of programs and strategies, which will place English language and literacy provision for adults on an improved footing.

Yours sincerely,

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ACTA President

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AMEP Evaluation

Skills for Education and Employment Evaluation

**Submission from
The Australia Council of TESOL Associations**

December 2104

Contents

INTRODUCTION	2
Who We Are	2
This Submission	2
PART 1: ANSWERS TO THE EVALUATION QUESTIONS	3
PART 2: SOME UNDERLYING/COMMON ISSUES	7
1. Learner Needs, Programs and Pathways	8
Starting Points	8
Pathways	10
2. Reporting on Client Progress in the AMEP and SEE Program	13
Reports on Client Progress: Are They Credible?	14
Use of Reporting Systems	14
The Adequacy of the ACSF	15
Multiple Reporting Requirements	15
Flow-on Effects	16
3. Client Retention and Attendance	17
Retention	17
Attendance	18
4. Competitive Contracting: Does It Promote Efficiency and Effectiveness?	19
CONCLUSION	22
SELECTED REFERENCES	24

Introduction

Who We Are

The Australian Council of TESOL Associations (ACTA) is the national coordinating body of State and Territory professional associations for the Teaching of English to Speakers of Other Languages (TESOL).

ACTA represents and advocates on behalf of teachers, parents and guardians, and English-language learners in all education sectors and contexts across Australia, including Aboriginal and Torres Strait Islander students who speak traditional/heritage languages, creoles and varieties of Aboriginal English.

ACTA's objectives are:

- i. to represent and support the interests of teachers of English to speakers of other languages and dialects
- ii. to ensure access to English language instruction for speakers of other languages and dialects
- iii. to encourage implementation and delivery of quality professional programs at all levels
- iv. to promote study, research and development of TESOL at local, regional, national and international levels.

Our membership comes from all educational sectors: pre-schools; schools; adult, community, TAFE and other VET settings; consultancy services in State and Territory education departments and the independent and Catholic sectors; and university teacher education departments.

This Submission

ACTA warmly welcomes the AMEP and SEE Program Evaluations, especially the long-overdue aim of considering “the strategic alignment between the two programs” and “whether there are opportunities for improving” how they work together.

Over approximately the past 25 years, problems have accumulated in the AMEP, the SEE Program and its (numerous) predecessors. Although manifested in slightly different ways, the fundamental problems are:

- excessive red tape and bureaucratic attempts to micro-manage programs
- non-productive uses of learners', teachers', administrators' and public servants' time, energies and resources
- obstacles to learner pathways into education, training and full participation in Australian life.

The current Evaluations and the location of these programs within one Commonwealth Government department offer a once-in-a-generation opportunity to remedy these problems, fundamentally rethink the programs, and develop a coherent, comprehensive but flexible approach to adult English language and literacy provision.

For these reasons, we consider the AMEP and SEE Program in this one submission, differentiating as appropriate.

Our submission has two main sections. **In Part 1**, we directly address the Evaluation questions. **In Part 2**, we discuss some crucial issues which underpin our answers to these questions.

Part 1: Answers to the Evaluation Questions

1. *Is the AMEP well designed to meet the language and settlement needs of migrants/humanitarian entrants, including catering for clients from different visa streams?*
2. *Is the SEE Program well designed to meet the needs of job seekers with low language, literacy and numeracy skills?*

What is meant by these questions is not entirely clear.

If the questions refer to **curriculum and teaching**, our answer is that:

- i. teachers and providers are totally cognisant of and committed to meeting these needs
- ii. good design means that teaching to meet these needs cannot be uniform, given clients' different levels of English proficiency, contexts for learning and previous experiences
- iii. the diversity of needs and contexts means that diverse forms of provision must be supported and resourced, including full-time, part-time (day-time and evening) and distance education programs and **flexible mixes of these** – providers currently experience barriers to offering this diverse provision, which should be investigated and overcome where feasible
- iv. SEE Program teachers have reported to us that they “struggle to know *how* the SEE Program is designed”
- v. a rich and diverse array of curriculum resources has been developed over the past 30 years to support teachers in teaching to these goals – Australia has been outstanding in curriculum development for English language and literacy learners
- vi. a variety of accredited courses that target English language and literacy goals have made a major contribution to meeting settlement, educational and employment needs and goals – they are the product of over 20 years of development, revision and upgrading, and provide recognised and monitored standards that support quality, consistency and accountability at national and local levels
- vii. for AMEP and SEE Program clients with very low literacy and minimal/no previous education, current assessment frameworks would appear to be unsatisfactory (see below: Section 2 “Reporting on Client Progress”)
- viii. short-term perspectives on employment outcomes have a narrowing effect on curriculum and teaching, and can constrain teaching in meeting actual learner needs, especially those with very low English proficiency and minimal/no previous education, those suffering the effects of trauma and torture, and those disengaged from education and employment, including Indigenous youth

- ix. current EAL/D tuition entitlements are insufficient to prepare some clients for further training or employment.

If the questions refer to **overall programs**, including how they are administered, our answer is that both the AMEP and SEE Programs are far from optimal in meeting client needs, because:

- i. restriction of eligibility for the SEE Program to job seekers leaves many exiting the AMEP with nowhere to continue their English language and literacy learning, for example, mothers/carers of young children, those with minimal/no previous education, those suffering long-term effects from trauma and torture
- ii. eligibility for the SEE Program excludes certain categories of job seekers: part-time workers, holders of certain kinds of visas, and those who have disengaged from education and employment
- iii. the current method of paying providers on the basis of hourly attendance is effectively an incentive for providers to exclude those likely to have irregular attendance patterns (some of those in i and ii above) – these are among the very people this program needs to reach and encourage into training and employment
- iv. SEE clients have insufficient support in locating and moving into appropriate State-based TAFE and community programs
- v. pathways from the AMEP to the SEE Program and beyond are often incoherent, inflexible, and involve counter-productive red-tape (including involvement with Centrelink and Job Search Australia agents)
- vi. excessive compliance requirements are taking considerable toll on teachers and managers, to the point where these requirements are significantly undermining the stated goals of ensuring quality provision
- vii. a lack of resources, together with crucial disincentives in how providers are funded, prevent programs from targeting educational and employment opportunities in some highly effective ways, notably, through integration with mainstream VET programs and work experience placements
- viii. qualification requirements appear to be under downward pressure
- ix. some referral agents from registered training organisations are placing clients in unsuitable courses in order to increase their own organisation's enrolments
- x. competitive contracting is wasteful, inefficient, masks real costs, entails excessive red-tape, prevents long-term planning, and erodes quality provision; a cheaper, more efficient alternative that would promote quality provision is possible (see Part 2 "Competitive Contracting: does it promote efficiency and effectiveness?").

3. *What impact has the new AMEP and SEE Program business model had on clients and service providers?*

If 'business model' refers to provider payments according to hourly client attendance (including placement assessments), our understanding is that it is unsatisfactory, because:

- i. there are no consequences for or checks on those who do not take regular attendance seriously
- ii. conversely, providers attract the penalty and the entire risk for clients' irregular attendance, which promotes a highly defensive approach to all aspects of budgeting, compounds their difficulties in planning ahead, and is an incentive to misrepresent attendance records
- iii. coupled with continuous enrolment and multiple reporting requirements, even a small number of irregular attendees create difficulties for teachers in maintaining coherence in their lessons and overall program (see below Section 2: "Reports on Client Progress")
- iv. the payment system contains disincentives for providers to permit teachers to attend assessment moderation meetings and to offer teachers in-house professional development; regular moderation meetings are essential for the credibility of reports on client progress; in-house professional development is essential for developing coherent quality provision.

However:

- v. this system is preferable to the previous one, where payments were staged according to client attendance for a fixed number of hours, which meant that no payment was received for tuition if clients withdrew before that point.

4. *How are the four indicators of settlement success (social participation, independence, personal well-being and economic well-being) considered and incorporated into the provision of services?*

5. *How effective are the AMEP and SEE Programs in contributing to settlement, education and employment outcomes?*

The most effective indicator of settlement success for adult migrants is English language proficiency. It underpins the four indicators listed above.

See the answers to Questions 1 and 2 above. Further:

- i. curriculum, materials, teaching and counselling services in the AMEP prioritise settlement success
- ii. without systematic research, there is no way of knowing how effective the AMEP and SEE Programs are in contributing to positive settlement, education and employment outcomes; it is impossible for providers to track post-program outcomes systematically unless they or others are funded to undertake this research

- iii. anecdotal accounts suggest that high quality provision certainly assists clients towards these goals in the short- and long-term
- iv. these outcomes are frustrated by a lack of a coherent framework within which the AMEP and SEE Programs operate
- v. short-term perspectives and inappropriate assessment requirements mitigate against clients with very low literacy and minimal/no education achieving these outcomes.

6. *What are the barriers to and facilitators of good performance in the AMEP and SEE Program?*

Facilitators of good performance are:

- i. **the outstanding commitment** of teachers to their students and the programs
- ii. **high levels of teacher qualifications (initial and specialist) and on-going professional development** – the evidence is overwhelming that “teacher preparation helps candidates develop the knowledge and skill they need in the classroom, well prepared teachers are more likely to remain in teaching [and] well prepared teachers produce higher student achievement” (National Council for Accreditation of Teacher Education, p. 3; see also Darling-Hammond et al 2005, Laczko-Kerr & Berliner, 2003)
- iii. **high-skilled support staff** with responsibilities for client welfare, settlement issues and pathways planning, so that teachers stay focussed on their core responsibilities
- iv. **stability** that permits long-term planning.

Barriers to good performance are:

- i. **multiple and extensive compliance requirements**, which deflect teachers from planning lessons and teaching, pre-occupy and dominate managers’ time, and undermine the organisations’ sense of purpose and morale
- ii. **continuous enrolments**, which make continuity and coherence in teaching difficult (but see Part 2 “Reporting on Client Progress”)
- iii. a focus on meeting **short-term demands** (in contrast to long-term objectives)
- iv. **competitive contracting rounds**, which disrupt and de-stabilise providers at every level (managers, teachers, clients) for approximately 12 months every round
- v. **lack of support for professional development** – see above.

7. *What changes could be made to increase the number of clients able to transition to job pathways or more advanced training at the conclusion of the AMEP and SEE Program?*

- i. **a root-and branch review of provision and pathways** for English language and literacy learning in the post-school, non-University sectors, including distance learning and within the wider VET sector and industry, which is undertaken by a small group of independent experts with substantive and credible experience and expertise in the field (notably: language & literacy learning, adult education, assessment, public administration) and given sufficient time to undertake proper in-depth consultations, including a national and/or State-

- based conferences of teachers and managers, and which is tasked with bringing coherence and an overall vision to adult English language and literacy provision in Australia
- ii. support, encouragement and resources for:
 - programs that include, target and assist those liable to be poor attenders (see answers to Questions 1 and 2 above)
 - programs that include partnerships between and within reputable training organisations
 - work experience programs
 - mentoring and English language and literacy support roles for providers within mainstream VET and industry settings
 - expert counselling services that provide comprehensive advice on *all* local pathways, and *genuine* assistance in accessing these
 - iii. a long-term view of pathways that supports provision for those who are not immediately seeking training or employment (see answers to Questions 1 and 2 above)
 - iv. affordable and accessible child care beyond the AMEP to support and encourage more women to embark on education and employment pathways.

8. *How could the AMEP and SEE Programs work together better?*

- i. the two programs should be administered as part of **an overall coherent approach to English language and literacy provision** in the post-school, non-University sector (see below: Part 2 “Learner Needs, Programs and Pathways”)
- ii. this approach should allow for **different entry points and program sub-goals**
- iii. this approach should be **context-sensitive** and not assume that one size fits all in the different cities, regions and remote areas – **consultation with local providers** is therefore essential
- iv. this approach should *not* be devised from the top down solely by Departmental officials or generic consultancy firms – see answer (i) to Question 7 above
- v. as part of the review recommended above – or in any case – a review of assessment, reporting and compliance requirements in the AMEP and SEE Program is urgently needed. This is a highly complex and controversial area and must be undertaken by experts in whom providers and teachers have real confidence.

Part 2: SOME UNDERLYING/Common Issues

If more than stop-gap approaches to the AMEP and SEE Program are to follow this Evaluation, some fundamental issues relating to the questions above must be considered.

Among the most pressing are:

1. Learner needs, programs and pathways
2. Reporting on client progress in the AMEP and SEE
3. Client retention and attendance
4. Competitive contracting.

1. Learner Needs, Programs and Pathways

ACTA strongly endorses the Evaluation focus on client *needs*, because this concept incorporates *starting points*, *pathways* and *desired outcomes* in program planning and development.

Currently, the AMEP and SEE Program are defined solely with reference to outcomes (e.g. “settlement”, “job seeking”). This perspective obscures learners’ starting points and the pathways they travel towards these (and other) desired end points or outcomes. Programs structured to fit this “one-size-fits-nearly-no-one” approach frustrate teachers and clients because they fail to:

- build on what clients know
- address what clients need – and *don’t* need – to know
- determine the best routes to follow and how long they might take
- achieve desired outcomes.

An understanding of learner needs provides a framework for different programs to address different learner needs *and* combine or merge approaches as needs overlap.

Bringing the AMEP and SEE Program under the aegis of the Department of Industry has the potential for developing an approach to English language and literacy provision which is inclusive, coherent and (somewhat paradoxically) accommodates diverse starting points and pathways. The principles of inclusiveness, coherence and accommodating diversity should guide the recommendations and policies resulting from this Evaluation exercise.

In the context of the AMEP and SEE Program moving to a single Commonwealth department, we recommend that:

1. these programs be administered within a **coherent policy and administrative approach to English language and literacy provision** in the post-school, non-University sector
2. this approach be formulated through a **root-and-branch expert review**.

Starting Points

The starting points for adult learners ***who lack literacy skills and speak English as their only/main language or mother tongue*** are very different from those who use *other* languages as their primary or main means of communication and who are therefore ***learning English as their second/additional language or dialect***.

Those who have grown up speaking English (the first group) have been socialised and had their education (however much or little) in English. Their need to acquire basic literacy skills will stem from many factors but their starting points and pathways into literacy will have in common:

- i. ***an existing foundation in spoken English***, for example, an ability to distinguish sounds in Australian English and a contextualised knowledge of many English words and all basic sentence patterns
- ii. ***socialisation into local Australian cultural meanings and ways of speaking***.

We will refer to this group as **English L1 literacy learners**.¹

¹ L1 refers to the fact that English is these learners’ first (or main/dominant) language.

In this submission, we do not address the very particular issues related to **English L1 literacy learners**, who make up a relatively small proportion of learners in the SEE Program. We make two fundamental recommendations:

Literacy programs for adult **English L1 literacy** learners must:

1. **build from these learners' starting points** and use them to underpin teaching
2. address the profound and diverse reasons **why these learners have not learned literacy** despite their school education in an English-speaking environment.

A major group among those **learning English as a second/additional language** are adult migrants. They have in common the need to learn:

- i. how to distinguish between and produce English sounds
- ii. English vocabulary, sentence patterns and Australian cultural norms in speaking and writing (e.g. ways of expressing courtesy/politeness)
- iii. knowledge about Australia.

We will refer to this group as learners of **English as a second/additional language (EAL)**.

Within this group, there are several crucial differences in their starting points.

- i. Some EAL learners will enter the AMEP and/or SEE Program with **good literacy skills in their other language(s)** based on their previous education in other languages. Some may also have encountered English as a foreign language, probably in school. For them, learning literacy in English requires programs that build on this knowledge.

But, unlike with English L1 literacy learners, programs cannot assume fluency in (or any) spoken English or much knowledge about the local Australian context.

- ii. A quite different group of EAL learners begins learning English **with little/no previous formal schooling**, although some may be highly skilled in acquiring knowledge orally in out-of-school contexts. Like other EAL learners, they require programs that create a foundation in spoken English.

But, unlike those who have learned literacy in school, this need is tied to their equally urgent need to acquire basic real world and school knowledge.

Considerable evidence exists that rates of EAL learning correlate strongly with previous levels of education (Achren & Williams, 2006; Moore et al 2008; Spurling et al., 2008; Watt et al., 2004).

- iii. Yet another very different group of EAL adult learners come to English using a **traditional Aboriginal language or an Aboriginal/Torres Strait Islander creole** as their main language. Their learning needs (starting points, pathways and goals) will partly overlap with those of both other EAL learners *and* English L1 literacy learners but also will differ profoundly in other respects.

- iv. **Speakers of Aboriginal English** also access the SEE Program. Their starting points often include a self-deprecating view of their language use, inculcated by their experience of schooling and in the wider society. They will share some learning needs with the other Indigenous learners but differ in others.

We refer to these two groups as *Indigenous learners of English as an additional language or dialect (Indigenous EAL/D learners)*.

- v. Other clients in adult English language and literacy programs **come from the Pacific Islands** and may speak creoles related to an Aboriginal/Torres Strait Islander creole. Their linguistic, cultural and educational starting points and pathways may overlap with or differ from other EAL/D and English L1 learners.

This group is often referred to as **Pasifika students**.

ACTA is not arguing for any form of continuing “segregation” between these various types of learner. As they progress in their learning – and *if* their starting points have been well accommodated – potential exists for some pathways to merge very productively, *as long as* each groups’ learning needs is well understood by teachers (– see our point re teacher qualifications in Question 6 above; also footnote 2 below).

ACTA represents teachers of all EAL/D learners. Our members include those with considerable expertise in teaching Indigenous EAL/D learners and possibly some with Pasifika students. This expertise also exists among members of the **Australian Council for Adult Literacy (ACAL)**. Unfortunately, those preparing this submission have not had sufficient time to draw on these experts. However, in preparing this submission we had one report of Indigenous EAL/D learners in the SEE Program being taught an inappropriate literacy curriculum, and we believe this case is not unique.

Pathways

Since the mid-1980s, ACTA has argued for developing English language and literacy programs that assist EAL/D learners along pathways towards mainstream education, further training and/or employment. These end points – be they short- or long-term goals – are, to a large extent, beyond dispute as desirable for most learners. In some cases (e.g. mothers with young children), a long-term view of these goals is essential.

The key policy issues relate to the difficulties, barriers and brick walls along the way.

Coherent policy-making and planning should work to identify these difficulties, barriers and brick walls, and systematically seek to overcome them. Our members continue to report on the lack of coherent pathways for many adult migrants and refugees. On-going frustrations attach to moving between the AMEP, SEE, WELL, VET and community ESL programs. To the extent that these pathways *are* accessed, continuity may be lacking in program content or conversely they may contain unproductive overlaps.

Most adult migrants and refugees arrive in Australia with high ambitions. These may be thwarted by training that does not address their needs (see Miralles, 2004). A significant barrier would appear to be the inflexibility of current VET funding mechanisms (see Industry Skills Councils, 2011, p. 13 for discussion of this issue, and recommendations in *Foundation Skills in VET Products for the 21st Century*). We also note that State funding subsidies for English language classes have mostly (entirely?) ceased, thereby excluding and disengaging those who cannot afford TAFE fees.

English language and literacy skills are an ongoing and integral requirement in almost all parts of the workforce from the most basic skill levels to high-skilled professions (e.g. engineering and health). Programs that target basic English language and literacy needs are clearly high priority but teaching more advanced skills must retain a place in policy-making and planning.

Our long-term advocacy in this area suggests to us that building sustainable and viable pathways is highly context- and network-sensitive. Close consultation and collaboration is required between policy makers and high quality, experienced English language providers – those who have achieved successes (and they do exist in some States) and those who have been thwarted to greater or lesser degrees.

Building coherent pathways is a difficult process. It is impossible without **consistent and long-term policies and support**. It is not assisted by frequent churn in government officials responsible for/advising on programs, which fatally undermines trust and institutional knowledge. Similarly, competitive contracting can catastrophically hinder, undermine or destroy stable and viable pathways (see below).

Overall, a coherent but flexible approach to ensuring stable and viable pathways for English language and literacy learning requires policy support and encouragement for:

i. Programs and resources

- flexible and targeted training in a variety of contexts, settings and arrangements (e.g. traditional full- and part-time classroom teaching, distance education, supported work experience, support and mentoring in the workplace, bilingual support in community settings)
- teaching resources appropriate to diverse learner needs
- maximum flexibility in assisting clients to combine industry units in VET courses with units from accredited English language and literacy courses (e.g. aged care training that allows these combinations).²

ii. Research

- an investigation into providers' actual experiences in articulating learners between English language and literacy programs and beyond
- longitudinal studies of learner trajectories

² We had these combinations particularly in mind when referring to merged pathways in the conclusion to the section on "Starting Points" above.

- practically-oriented investigations into the demands of specific workplaces, occupations, further education and community settings, to foster continual improvements in linking English language and literacy programs and materials to real world contexts
- a review of effective educational practices and current best practice in contextualised English language and literacy teaching (see, for example, the excellent research conducted by the NRDC in the UK).

iii. Professionalism and Collaboration

- policy settings that support and encourage continuity and pathways *within* and *between* English language and literacy providers (e.g. AMEP and SEE providers) and other VET contexts and institutions
- regular consultations between policy makers and responsible government officers with providers (administrators and teachers) and professional associations (notably ACTA and ACAL)
- a well-qualified, skilled and specialised English language and literacy teaching force capable of working in and across EAL/D and adult literacy programs, and in industry, workplace and VET settings, and who can conduct accurate initial assessments of learners and can place them in appropriate programs
- sustained professional development for teachers and managers in English Language and Literacy programs, including updating them with research findings (e.g. as per the above).

ACTA applauds some recent initiatives that are furthering the above requirements:

- i. the **National Foundation Skills Strategy (NFSS) for Adults**, a component of a joint initiative by Australian governments to support priority action areas. We are pleased that one of our members was invited to become a Member of the Foundation Skills Community of Practice, and is working on a project “Numeracy resources for ESL/English as an Additional Language or Dialect (EALD) programs” to support capacity building for mainstream VET teachers, increasing their understanding of EAL/D learner needs and providing strategies for more effective teaching.
<http://www.statedevelopment.sa.gov.au/skills/national-foundation-skills-strategy-project?refresh=true#ElementThree>
- ii. within the NFSS, a **stocktake of qualifications** carried out through liaison with Australian Council of Deans of Education Vocational Education Group (ACDEVEG) to identify current higher education credentials for all AQF level qualifications and units relating to LLN practitioners and volunteers (both literacy and EAL/D/TESOL qualifications) and to place these credentials on a national register: see www.training.gov.au . We hope that this project goes some way to ensuring the maintenance of recognised standards in EAL/D teacher qualifications.

ACTA’s position on EAL/D qualifications can be found at <http://tesol.org.au/Advocacy/National-Professional-Standards-for-Teachers>

- iii. the **Language, Literacy and Numeracy Practitioner Scholarships Program**, which is supporting upgrading specialist EAL/D skills. Although we commend this assistance to teachers to gain specialist qualifications, we are concerned at the variable quality of programs that can be accessed by scholarship holders.

We do not accept Certificate IV as an acceptable level of qualification for EAL/D teachers in the AMEP or SEE Program. See Question 6, point ii.

2. Reporting on Client Progress in the AMEP and SEE Program

Providers variously report to the Department of Industry with reference to:

1. the **International Second Language Proficiency Rating Scale (ISLPR)**, a description of levels of general proficiency in English – used for initial placements in AMEP classes
2. the **Australian Core Skills Framework (ACSF)**, a competency-based specification of 11 generalised English Language, Literacy and Numeracy “indicators” – used for initial placements *and* reporting on progress in the SEE Program (each mapped against 2 examples of individual students’ performance)
3. competency-based **Learning Outcomes** that describe client progress in a variety of **accredited English language courses/schemes**, for example, the *Certificates in Spoken and Written English (CSWE)*, the Victorian *English as an Additional Language (EAL) Framework Certificates*, the South Australian *Certificates in English Proficiency and Diploma of English Proficiency*. All AMEP and SEE providers are required to teach at least one of these courses; some teachers may teach more than one
4. **Key Performance Indicators (KPIs)** for the AMEP and SEE Program – these include reports on learner progress (and other indicators, e.g. completion of entitlements). In the AMEP, learner progress is documented with reference to CSWE Learning Outcomes. In the SEE Program, learner progress is documented against the ACSF.

The ACSF and the various Certificates grew out of the competency-based training movement, which took hold in Australia in the mid-1990s. Most have undergone successive revisions and re-development with considerable investments of time, expertise and resources. The much older ISLPR also has a long history of development and updating, going back to the late 1960s. All have their considerable strengths and some weaknesses, matched by passionate advocacy (usually well-informed) and criticisms (which can be misguided).

All these systems are organised around specifications that are said to constitute an English language “level”. In the various Certificates, these specifications also constitute the basis of the curriculum. In contrast, the ISLPR and ACSF claim to be “generic” specifications of English language and literacy **proficiency** (the ISLPR) or **competencies** (the ACSF) and are supposedly applicable irrespective of any particular teaching program.

The ACSF and some Certificates have been “mapped” against each other with a view to specifying equivalences. However, provider accreditation to teach a given Certificate requires that assessments are undertaken with reference to that Certificate’s specifications.

Reports on Client Progress: Are They Credible?

It seems clear that, overall, reporting on client progress in the AMEP and SEE Program does not meet fundamental requirements for accuracy and consistency.

Use of Reporting Systems

To be meaningful, reports on client progress must be **accurate** (i.e. actually report what they claim to report) and **consistent** (i.e. report on the same phenomena across populations and time). In educational assessment terms, they must be “valid” and “reliable”.

The systems above were developed as an alternative to standardised tests. Good standardised tests are relatively reliable (yield relatively consistent reports across populations and times) but are susceptible to criticism that they have weak validity (may not elicit performances that allow learners to demonstrate the skills that the tests claim to test). Conversely, the systems above claim greater validity but they face difficulties in being reliable. Unlike a standardised test – which is the same no matter where or when it is administered and marked – assessments in these systems hinge on individual teacher/assessor decisions about whether or not a learner’s performance(s) meet the system’s specifications for each English level (or its various sub-components).³ For this reason, the application and decisions entailed in using these systems are vulnerable to significant inconsistency.

These systems are commonly known as “**rating systems**”. Accuracy and consistency is promoted by attention to the **assessment tasks** used and to **the ratings** given to learner performances on these tasks.

Attention to consistency in tasks requires that equivalent tasks be used in assessing at a given level (or sub-component). Attention to validity/accuracy is also required. That is, actual assessment tasks must truly require the type and level of performance that the assessment system describes.

To meet these task requirements, “**task banks**” have been developed for some (but not all) assessment systems (e.g. the CSWE and the ACSF – see http://www.precisionconsultancy.com.au/acs_framework). ACTA welcomes the on-going work on the ACSF and ACER’s involvement in bringing greater consistency to its application, as described at <http://www.acer.edu.au/cspa/cspa-development>

Accurate and consistent reporting on client progress also requires **accurate and consistent ratings**. Accuracy and consistency is developed through initial briefings, practice, and “moderation” sessions for teachers/assessors. In moderation meetings teachers/assessors

³ These specifications are described in terms of “indicators” or observable pieces of evidence that the learner has achieved a given competency, e.g. “recognises the orientation of simple texts, e.g. left to right, top to bottom”.

compare and discuss reasons for their decisions about various examples or actual performances and attempt to achieve agreement.

Without regular moderation meetings for teachers/assessors, consistent ratings are impossible. And for such meetings to be focussed and productive, participants need shared understandings of assessment principles and how English language and literacy develops. For this reason, some of the systems above specify required qualifications for assessors, usually an undergraduate degree, teaching qualification and post-graduate specialist training in EAL/D or literacy teaching.

Although task banks and training for most systems exist in one form or another, we understand that:

1. **access to task banks** is limited
2. **professional development** in using these assessment schemes appears to be rare or non-existent
3. regular (or even one-off) attendance at **moderation sessions** is quite variable.

The Adequacy of the ACSF

A further concern is the frequent claim to ACTA that the ACSF, which is required in the SEE Program, is insufficiently specific about fundamental features in learning English (notably indicators of progress in English pronunciation, vocabulary and sentence structure). This concern is acute for learners with very low English proficiency and minimal/no previous education. Despite the addition of a pre-Level 1 ACSF description, our members believe that the ACSF does not accommodate learning at a slower pace and therefore permit teachers to report on important aspects of these learners' actual progress.

Progress in some key aspects of English language development does not appear to “count” in ACSF-based reports on the achievements of EAL/D learners, their teachers or providers. This gap undermines the credibility of the ACSF as an accurate EAL/D reporting tool, especially in regard to program design to meet the needs of low English language and literacy skills and many on humanitarian and refugee visas.

Multiple Reporting Requirements

In both the AMEP and SEE Programs, assessments are done when clients the program, then at certain “assessment points”, and finally when they exit the program.

In the AMEP, the ISLPR is used to place new clients in classes most suitable for their English language level. Thereafter, teacher report learner progress on CSWE Learning Outcomes.

In the SEE Program, initial assessments are done using the ACSF. Thereafter, teachers must assess and report learner progress against *both* the ACSF and the accredited Certificate offered by the provider. (Where providers offer more than one accredited Certificate, teachers teaching those courses must use each Certificate's assessment system.)

Continuous enrolments and (therefore) exit points in both the AMEP and SEE Program effectively entail that these assessments are done separately and one-by-one for each individual at the relevant time in their customised learning plan. These separate assessments therefore take up a considerable portion of teachers' time.

SEE teachers report that they find the requirement for double reporting against both the ACSF and an accredited course not only onerous but pointless – as one person said, it “adds a lot to the teachers' workload with no additional value for the learners”.

It should be noted that teachers' wages are calculated according to classroom teaching hours, although pay rates carry a loading for preparation and assessment. Teachers consistently report to ACTA that the hours assumed in these loadings come nowhere near the actual time spent doing individualised assessments and writing up reports.⁴

This requirement becomes particularly frustrating when teachers teach a sequence of lessons in preparation for one or two individuals' assessment points, only for those individuals to be absent on the day planned for that assessment.

The sense that teachers' work is dominated by reporting is not alleviated by requirements to report on student attendance by the hour (see below “Attendance”).

Flow-on Effects

What are seen as excessive demands for reporting undermine teachers' support for and ability to cope with continuous enrolments. Continuous enrolments present challenges to teaching at the best of times but, if handled well, greatly benefit clients (Yates 2008a & b). It is unfortunate that teacher motivation to accept these challenges is being undermined in this way.

There is widespread agreement among providers and their teachers that that the assessment and reporting workload is so excessive that they cannot maintain accuracy and consistency.

The result is teacher cynicism and alienation. The feeling that it is impossible to maintain accuracy and consistency, that it does not benefit learners, that it distracts from preparing lessons and teaching, and that it is not properly remunerated creates its own vicious circle that undermines commitments to accurate and consistent reporting.

Our reports are unanimous and vehement in describing current requirements for reporting on learner progress as: **out of hand** (e.g. “crippling”), **pedagogically meaningless** and **no longer credible** (e.g. “tokenistic” and “just a mess”).

In preparing this submission, we have not had the time or resources to come up with feasible, evidence-based recommendations on possible remedies for these problems. The issues are complex and highly fraught, as anyone with long experience in this field can testify. We therefore urgently recommend:

⁴ All reports must be accompanied by two examples of the data on which ratings are based.

1. **Continued examination of the Australian Core Skills Framework (ACSF)**, including its suitability for use with different cohorts of EAL/D learners in the SEE Program, how it is understood within the VET sector, among employers and in the community.

This examination should include **expert consideration of whether or not it is possible, useful and revealing to assess EAL/D learners, especially in the early stages of their learning, with an assessment tool that is designed for English L1 literacy learners.**

We would have confidence in ACER investigating this issue, provided they were not constrained in this examination.

2. Research to develop **accurate markers of progress for EAL/D learners with minimal/no previous schooling and low English levels.**

In the interim, providers should be consulted with a view to arriving at credible and accurate KPIs that relate to these learners' progress.

3. **A review of current reporting and compliance requirements** to simplify and reduce them, and give them credibility.

4. Acting on these recommendations requires:

- **in-depth and careful consultation with providers and practitioners**
- **input from experts in assessment, EAL/D development and public administration who are accepted by language and literacy educators.**

3. Client Retention and Attendance

Retention

Extensive research has been undertaken in the AMEP on client retention, which is also relevant to clients in the SEE Program. An extensive literature review into why adult migrants exit English language/educational programs listed the following factors:

- the need to find work or a change in work circumstances
- the need to look after family
- lack of previous formal education
- lack of or inaccurate information
- personal attitudes such as lack of confidence, family attitudes and religious beliefs
- psychological factors of torture and trauma.

(AMEP Fact Sheet '*Retention of Adult Migrant Learners*', October 2003).

Conversely, client continuations are promoted by:

- access to a range of flexible learning options
- encouragement of student learning
- flexibility for learners to express their own learning needs

- pacing appropriate to learner needs
- compatibility between students' learning style and teaching methods.

(For a comprehensive reference list, see AMEP Research Centre, 2003; Noy, 2001).

Our recommendations above on learner pathways address these issues.

More broadly, discontinuation rates hinge essentially on structural factors, most notably the labour market and the availability (or lack) of employment *vis à vis* the composition of migrant intakes, including the numbers affected by pre- and post-arrival trauma. So, for example, high unemployment rates will increase retention rates, and conversely high demands for labour will make clients feel that completing AMEP and SEE entitlements is less essential. We note that the previous payment system required clients to achieve certain attendance “milestones” (100, 150, 175 hours in the LLNP) if providers were to be paid for their tuition. In this respect, payment by the hour is fairer. We understand that, rather than penalising providers for meeting program goals as was the case earlier, client discontinuations to access work or further study now contribute positively towards KPIs.

Attendance

Both discontinuations and absenteeism are abiding features in *all* non-compulsory and informal adult education programs. Adult migrants' competing settlement and life imperatives will always over-ride any individual's commitment to attending English classes, no matter how diligent the student or how excellent the teaching. The appointments that students must absent themselves from class to attend (and the time of those appointments) are generally non-negotiable (e.g., with Centrelink and Job Services Australia (JSA)⁵, doctors, counsellors, children's schools etc.). Equally non-negotiable are the search for accommodation and employment, re-locating to secure accommodation and/or employment, employment hours, one's own and other family members' illnesses, and coping with the effects of torture and trauma. These appointments and disruptions are never organised – and cannot be organised – to suit English class times and/or courses.

The current payment system according to client attendance responds to the argument that providers should not be funded for services they are not providing. However, this system is punitive for providers. It creates considerable budget instability and paperwork. The required roll calls are highly disruptive to teaching. We have received reports that at least one provider requires teachers to mark rolls every 15 minutes of class time.

Payment that is substantively dependent on client attendance (especially by the hour) ignores the fact that provision of services largely entails fixed costs. Salaries, rents, teaching materials, computers, libraries, whiteboards, furniture and other infrastructure cannot be turned on and off according to daily student attendance.

This method of payment also contains a major disincentive for providers supporting any in-house professional development for teachers, because these activities are effectively unfunded.

⁵ A long-standing complaint by providers is that Centrelink and JSA take little/no account of clients' commitments to attend English classes in setting obligatory appointments.

We suggest that the following be discussed with providers as a more reasonable and balanced approach.

First, providers should receive an upfront *per capita* base payment for all those enrolled at the commencement (or close to commencement) of a block of time (say, 1 term or even half a term), which is topped up at the end of this time according to daily enrolment records. The base payment should be weighted to account for:

- victims of torture and trauma
- refugees with little/no previous schooling
- carers of small children and/or disabled or chronically ill family members.

Second, poor attendance should attract some cautions and risks for clients where they cannot provide evidence of genuine reasons for their absences (e.g. a notification prior to the absence would count as evidence.) Necessary absences are relatively easy to determine because they are irregular. In contrast, our members report that a client's lack of commitment to the program is signalled by regular and repeated absences, usually two-three days every week. Consequences for persistent absences without prior notification could be deferment of tuition entitlements to a subsequent course or, in extreme cases, a loss of entitlements.

4. Competitive Contracting: Does It Promote Efficiency and Effectiveness?⁶

Competitive contracting for the AMEP was introduced in 1997-1998. Previously, the Commonwealth funded State/Territory governments to deliver the AMEP through Adult Migrant English Services and TAFE systems. Some universities were also directly contracted for higher level English courses for professionals and in preparation for further training and studies. Since 1998, there have been several rounds of competitive tendering for the AMEP. Five year contracts to deliver the program in different geographical regions across Australia have been won by various public, private and for-profit bodies.

In contrast, the SEE Program and its myriad of labour market training predecessors (most recently the Language, Literacy and Numeracy Program, LLNP) have always been delivered through competitively-assessed tenders for short contracts (at one point, even 3-6 months).

Fragmentation and a lack of transparency on "commercial-in-confidence" grounds make it impossible to reach any objective and evidence-based assessment of the cost-effectiveness and efficiencies resulting from competitive contracting. What little evidence exists comes from the Australian National Audit Office audit of the AMEP in 2000-2001, which concluded that "the per capita cost of the contracted out arrangements is similar to those they replaced"(2001, p. 45).

The well-known international scholar Christopher Pollitt (2003) has extensively researched the uptake of competitive contracting and associated changes (commonly known as "new public management") in the late 1980s and early 1990s. He found that well-resourced evaluation studies in Australia and New Zealand could not document clear conclusions about precise savings or efficiency gains (p. 40). Extensive research into these approaches in areas such as health and

⁶ In their responses to the pre-final draft of this submission, two people wrote that they wept when they read the following two sections.

social services points to the unnecessary costs, gross inefficiencies and adverse effects on quality provision (see for example: Alford & O'Neill, 1994; Considine, 2001; Davis, Sullivan, 1997; Mulgan, 2003; Mulgan, 2006; Osbourne & Gaebler, 1993; Pollitt & Bouckaert, 2000; Zifcak, 2001).

Below we detail what we know of the specific effects of competitive contracting on the AMEP and SEE Program.

At the end/beginning of each contract round:

- i. **Substantive amounts of teachers', managers' and government officials' time, energy and professional focus** are devoted to preparing and assessing tenders. We are told that planning stops for approximately 12 months prior to submission of tenders and that key personnel work virtually full-time in anticipating and preparing extremely detailed and complex tender documents.
- ii. **Infrastructure and resources are wasted** when providers lose contracts or have had the region they service changed, and when infrastructure is dismantled, discarded or sold off (e.g. classroom and staffroom furniture, computers, textbooks, libraries, etc.).
- iii. **Extensive disruption occurs in provision and for clients**, while new providers establish centres, hire teachers, purchase resources and infrastructure, build local networks and establish admission procedures, teaching programs, and an administrative framework. We have reports of new centres without photocopiers for more than 5 weeks, no telephones for 4 weeks, no teacher resource room, students seated on broken office chairs with no desks, classrooms separated by movable partitions, and one whiteboard for a whole centre.
- iv. **Some new providers have been unable to commence or continue delivering the programs they have won.** New providers have been known to request the most basic advice on pedagogy, course design and materials, including from previous providers who have lost contracts. We know of at least one recent collapse of a provider with a newly won contract.
- v. **The workforce is subject to destabilisation and 'churn'**, when teachers' jobs are terminated with providers who have lost contracts.
- vi. **Exploitive employment practices are encouraged.** The award of at least some contracts is clearly intended to drive down teacher salaries, conditions and qualification requirements. It has already reduced some teacher's wages to as low as \$25 an hour. We find this process (which continues) unacceptable, especially given that almost all adult English Language and Literacy teachers are already employed without redundancy entitlements on short-term contracts (and laid on and off to match term times) or as casuals. The process exploits current teachers' commitment to professionalism and the fear of losing their jobs. It is the basis of the gross under-estimation of (and therefore non-payment for) the time teachers actually spend in meeting reporting requirements on attendance and learner progress.

Ongoing:

- i. **Program quality deteriorates.** The short-term financial gains that appear to follow from competitive contracting for the AMEP and SEE Programs are undermining program effectiveness, efficiency and their ability to attract new well-qualified teachers. Compliance requirements cannot reverse this process. In their current excessive form, they are hastening it. It is teachers' dedication to EAL/D learners that is maintaining the existing workforce and arresting even greater decline. Nevertheless, programs *are* in decline, as experienced teachers retire or lose their jobs, wages and conditions are eroded, and young, well-qualified teachers look elsewhere for more desirable employment.
- ii. **Cost savings and efficiencies are forgone** because competing providers will not collaborate and consult in referring students, sharing resources and professional development activities.
- iii. **Competition between providers contains perverse incentives to hide problems.** A lack of trust blocks productive exchanges of information and feedback at all levels within and between providers, and with responsible government officials (see Mulgan, 2006, for analysis of these problems in the Social Services sector). Pollitt's (2003) caution applies:
The sanctioning aspect can easily come to overshadow accountability relations so that, instead of being a means to foster learning and improvement, they become the focus for elaborately precautionary and defensive behaviour. (p. 89)
- iv. **Contract rounds contain incentives that are perverse and counter-productive.** The work for government officials in devising contracts and assessing tenders is intense, time-consuming and expensive, not least in ensuring that the process is confidential and secure.⁷ This work would be difficult to justify if contracts were always awarded to the same providers. The process is open to accusations of:
 - creating a lot of work when less would achieve the same or better outcomes (see below),
 - involving government officials in work that is better out-sourced to independent experts (see below)
 - having demonstrably bad impacts on provider efficiency, effectiveness and quality (see above)
 - requiring changes of providers to justify the process itself.

Quality educational programs require expertise, infrastructure, continuity, professionally committed teachers and managers, and a strong sense of common goals and values. Competitive contracting undermines all these.

It would be unthinkable if school education were delivered through cycles of competitive contracting. It is difficult to understand why training programs should be treated differently when they are key to people's participation in Australian society.

⁷ We are aware of one contract round that entailed a number of public servants to be locked down in hotel rooms for 4-6 weeks, working 10 hour days.

The continued use of competitive contracting for the AMEP and SEE Program is not evidence-based. It is wasteful, inefficient, self-justifying and undermines quality. **It is in direct opposition to the current Government's drive to reduce waste, red tape and unproductive expenditure.**

We propose the following system, which will maintain the supposed advantages of competitive contracting (re cost savings and flexibility) but eliminate its wastefulness and encourage higher standards.

Overall provider performance should be annually assessed by independent assessors (such as those used in the SEE Program) on a 1-5 point ranking scale, viz.:

- 1 = outstanding performance
- 2 = good performance
- 3 = satisfactory performance
- 4 = somewhat unsatisfactory performance
- 5 = unsatisfactory performance.

These rankings should be determined in relation to KPIs that are collaboratively devised by the Department, providers and external experts.

Contracts should be renegotiated every 5-6 years. Providers who score 3 or below in any two consecutive years should be required to submit a complete tender that is judged competitively against other tenders from existing and potentially new providers. Providers who consistently score at levels 1 or 2 should not be required to compete for new contracts.

Conclusion

A long time ago, the then-Minister for Citizenship and Multicultural Affairs, The Honourable John Cobb MP, welcomed participants to the 2005 AMEP Conference, as follows:

The AMEP is a true success story and is uniquely Australian. Through this program, and the dedication of all those who continue to make it the success that it is, all Australians – regardless of their linguistic and cultural background – are provided with a sound basis to pursue opportunities in employment, education and other aspects of social and economic life.

At the following year's conference, the Hon Andrew Robb, then Parliamentary Secretary to the Minister, concluded his welcome by saying:

On behalf of the Government, and the broader community, I again thank you for the outstanding commitment and contribution you are making to the lives of so many new arrivals to Australia. You can be justly proud of your efforts.

Reflecting some of this appreciation, Martin described the AMEP in even earlier days as unique in its “*strong sense of partnership between providers and the Commonwealth managers*” (1999, p. 26).

The same could not be said for the myriad of labour market English Language and Literacy offerings that preceded the SEE Program, which until this year were located within the vast Commonwealth Education portfolio. These were short-term, highly fragmented, confused and changing in their purposes, poorly monitored and administered completely at arm’s length.

In 2014, although program goals are not much altered, the delivery of Commonwealth English language and literacy programs has radically changed. In the AMEP, a defensive stance has replaced the partnership between providers and government officials – as reflected in one report that “managers don’t care about providers and people”. The AMEP conference and the research centre that brought program coherence and stimulated professional exchanges are no more.

This present Evaluation poses a number of questions about *program* design, effectiveness and improvements. Currently, the AMEP and the SEE Program are “programs” in name only. A genuine program consists of a coherent set of goals, resources and strategies that are shared, developed and underpinned by people working together, and invigorated by their commitment and co-operation. In 2014, the AMEP and SEE Program consist of individual contracts whose “commercial-in-confidence” contents are known only to government officials and each specific contractor, who is independent and mutually suspicious of all the others. In this scenario, the “dedication” and “commitment” praised by earlier Ministers count for nothing. Shared goals, dedication and commitment are replaced by compliance requirements. Fear of losing contracts and jobs is now used to motivate behaviour. Ironically, successive attempts to define and re-define requirements even more closely have created seriously perverse incentives to subvert and undermine them.

A return to the past “glory days” of the AMEP is out of the question, as is also – we sincerely hope – any reincarnation of inefficient and wasteful short-term labour market programs. But the co-location of the AMEP and SEE Program in a new Commonwealth Department offers an opportunity to learn from the past, take an honest and fresh look at the present, and re-think the future.

Past experience and present realities suggest to us that the following are fundamental to the efficient, effective, high quality provision of government services:

1. **Trust** at and between all levels of administration and delivery
2. **Professional knowledge, skills and commitment**
3. **Continuity** as a basis for planning, development and innovation
4. Genuine, honest and frequent **consultation** up and down the line
5. **Evidence** based on experience, consultations and truly independent research, which is used to guide decision-making
6. **The shared vision and values** that are created when these other factors are in play.

A commitment to achieving these fundamental goals would provide a sound and productive basis for specific recommendations in planning future adult English language and literacy provision in Australia. We commend these goals to the Evaluation team and the Department of Industry.

Such a commitment would solve the problems we have identified and lead to the following concrete outcomes:

- more efficient and cost-effective administrative arrangements
- a reduction in red tape, hidden and duplicated costs, and wasted energies
- increased co-operation between providers
- more coherent, flexible and open learner pathways for English language and literacy learning, and beyond to the broader VET system and employment
- better planning and on-going improvements in targeting programs, curriculum, teaching materials, assessment tools to meet diverse learning needs
- improved morale and increased commitment by teachers and managers
- credible, effective and widely accepted accountability mechanisms and measures
- higher quality provision.

ACTA would welcome continuing this conversation and any further opportunities for consultation within and beyond this current evaluation process.

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