

REFORMING ENGLISH LANGUAGE PROVISION  
FOR ADULT MIGRANTS & REFUGEE YOUTH  
FROM THE TOP DOWN –

*SOME CONCRETE PROPOSALS  
FROM THE BOTTOM UP*

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These proposals made in  
**ACTA submissions No. 108 & 108.1**  
to the  
***Parliamentary Inquiry into Migrant Settlement Outcomes***

ACTA's submission covered:

- **governance from the top down** based on the *National Settlement Framework (NSF)* and associated *Outcomes*
- **Early Childhood Education & Care**
- **school-aged children**
- **adults** (AMEP, SEE, TAFE, Higher Education, community)
- **refugee-youth** with minimal/no previous education
- **social disengagement & anti-social behaviour** by migrant-background youth (in accord with Inquiry Terms of Reference)

*One example of problems that apply across-the-board :*  
Provision for Refugee Youth  
with Minimal/No Previous Education

AT THE SCHOOL LEVEL

- ❑ **School Year Levels** based on **age-derived norms**
- ❑ Enrolling these youth has **resourcing incentives** for schools *but*
- ❑ **no checks on schools' ability** to provide required **specialist programs**

## Refugee Youth with Minimal/No Previous Education – SCHOOL LEVEL PROBLEMS

- cont.

- ❑ Youth believe **school is their only option**  
*but*  
don't get accurate advice on alternatives
- ❑ Commonwealth/State/system **school autonomy policies** and **one-line budgets** have **undermined/decimated** school ESL programs.

## Refugee youth problems AT THE AMEP & SEE PROGRAM LEVEL

- ❑ **AMEP (SPP) has the potential flexibility** to offer specially targetted youth programs & pathways  
*but*
- ❑ school-system red tape creates **obstacles & disincentives for AMEP providers** to accept youth into the SPP where schools cannot offer targeted programs  
*so*
- ❑ **insufficient numbers** to create special classes & programs *so* youth placed in **regular AMEP classes**  
*plus*

Refugee youth problems  
AT THE AMEP & SEE PROGRAM LEVEL  
- cont.

- ❑ **insufficient time** for these youth in the SPP + AMEP  
*but*
- ❑ **SEE Program KPIs** block onward pathways  
*plus*
- ❑ **short-term contracts** prevent the necessary  
**stability for developing programs, networks &  
pathways**

**Variations on these same problems occur**

**in English language provision**

*across the board*

**for adults & refugee youth in**

**the AMEP, SEE Program, TAFE, Higher Education,**

**& community programs**

**(and schools too).**

*Overview of*  
these same problems across the board

1. **Fragmented, inflexible and inconsistent provision**  
(*within and between* AMEP, SEE Program, TAFE/HE, community).
2. **Insufficient tuition hours & pathway blockages** for adults & youth with:
  - ❑ **minimal/no English**
  - ❑ **minimal/no previous education.**



## ON FRAGMENTATION & INCOHERENCE

### TEACHERS AT THE COAL FACE SAY:

E.g.:

*It is very difficult to get information about what happens after the AMEP because of the ad hocness of pathways. In our institute [but this is not true in some others], English **programs vary from semester to semester for those not eligible for SEE**. Sometimes we have EAL courses at all levels and sometimes just some levels and sometimes none, so for some students it is difficult to find an on-going English class, which they all need. After completing CSWE 3 **students do not have sufficient English to work or do many training courses**. Especially with higher unemployment, students have no choice but to study more English, which they need, but the courses are not always available. And then even after they have sufficient English there are fewer pathways that lead to jobs, and the training required is too expensive.*

## *On blocked pathways:*

*The biggest problem that continues NOT to be addressed by SEE and AMEP funding is the cohort of students that have already accessed their 5/610 hours of AMEP and are still at ACSF PLA/PLB without a capacity to benefit in SEE due to being **unable to achieve indicators at the required assessment points**. These pre-level 1 students are not eligible for federally funded English language tuition any longer. They still require tuition to participate in the community, to be integrated, to be socially included, and to help find employment. However, due to lack of any solid educational background during formative years, learning is more horizontal rather than vertical. In [X city], there are many students that are left out of access to services.*

## *Overview of problems across the board – cont.*

3. **DET culture, commitments, priorities** not directed to coherent, consistent quality English language provision:

Notably –

- Quality and coherent English provision & pathways undermined by **short-term contracting** that creates massive **instability** and **human & material waste**.

## ON WASTE FROM SHORT-TERM CONTRACTING

### TEACHERS AT THE COAL FACE SAY:

- *I was working on a SEE Programme which finished recently due to an unsuccessful tender. As much as we tried to find organisations to take our resources, there was still such a lot of waste. As I sorted through my own bank of moderated and validated assessment tools, hours of ACSF, CSWE & CGEA PD, workshop notes and the like, it hit me how much would and could have been re-used, and that much of the accumulated knowledge that I had gained was being wasted. More than that, my students would have to start again with a new set of teachers in yet another new learning environment. My employer paid for me to train in Auslan (2 levels) because we had some hearing impaired learners in 'hearing' classes. Will those learners' new teachers do the training which I've already done?*
- *Unless there was a problem with the quality of the service, why should it move? There has been so much waste in moving between providers. Wasted resources, paper, expertise, energy. Inefficiencies. Did I mention time...?*

*Overview of problems across the board :*  
DET PRIORITIES & COMMITMENTS **NOT** DIRECTED TO  
QUALITY ENGLISH LANGUAGE PROVISION

– cont.

- ▣ Counter-productive KPIs and other DET requirements

## ON ANTI-EDUCATIONAL KPIS

### TEACHERS AT THE COAL FACE SAY:

We are now spending **so much time gathering evidence which is of no benefit to student learning**. Mapping CSWE tasks to the ACSF, creating tasks to meet ACSF requirements, noting evidence, scanning evidence, putting evidence into reports at 200 and 400 hours, benchmarking, etc etc. **And are we teaching too?** Trying to! And getting students to **answer questions about their language learning that are difficult to answer and often about complex language processing**.

With 20 students in a class (contract requirement) and 10 weeks of 20 hours per week (200 hours), each student requiring 2 indicators reported every 200 hours, means that teachers need to do 40 reports. That averages one every single teaching day and a day off each week for staff meetings. Some teachers are reportedly **spending 2 hours on the assembling and writing of each individualised report**. That leaves them with an hour a day to do rolls, admin, preparation, selection and marking of assessment tasks.

*Overview of problems across the board :*

## DET PRIORITIES & COMMITMENTS NOT DIRECTED TO QUALITY ENGLISH LANGUAGE PROVISION

– cont.

*We have **more and more classes of multi levels** (even four levels within one 25-student class), and where teachers are **required to teach 6 hours and 15 minutes, with only 1 hour and 15 minutes left for preparation and admin, including reports**. Then it's the instability after every three years when the contract is given to whoever places a lower bid.*

## *Overview of problems across the board – cont.*

4. Disconnect between **English language programs** and other areas of **Settlement Services**.
5. **Lack of *specific* policy focus and provision** targeting the special learning needs of refugee youth with minimal/no previous education.



# DET

has responsibility for  
**schools, the AMEP & SEE Program**

*hence*

could potentially resolve these problems

*but*

any such resolution is thwarted by DET's

- ❖ **organisation** (silos)
- ❖ **policy priorities** (employment)
- ❖ **commitments & culture**

(KPIs that have nothing to do with quality English provision).

# ACTA's Proposals

1. Clearly distinguish between the **goals & clientele** of the **AMEP** and **SEE Program** :

- ❑ **AMEP** for **English language learners** (in 5-6 years after arrival)
- ❑ **SEE Program** for **job seekers with basic literacy & numeracy needs** (schooling all/mostly in Australia)

## ACTA's Proposals – cont.

### 2. **AMEP entitlements** based on:

- ❑ **English language levels** (up to ACSF level 3) *and*
- ❑ **years of previous schooling** (10+ /3-9/less than 2 years)

### 3. **TAFE & HE :**

- ❑ special purpose programs for **long-term residents**
- ❑ courses **above ACSF level 3**, including
- ❑ **enabling & bridging courses**

## ACTA's Proposals – cont.

### 4. Contracting system based on modern “risk assessment” principles

- ❖ Overall provider performance **assessed annually and rigorously by independent assessors** (along the lines of the current verification process) on a **5-point ranking scale**, viz.:
  - A = outstanding performance
  - B = good performance
  - C = satisfactory performance
  - D = somewhat unsatisfactory performance
  - E = unsatisfactory performance.

## Risk Assessment Contracting – cont.

- ❖ Providers who **consistently score A or B** retain their contracts until beginning of a new 10 year cycle.
- ❖ Providers **scoring C or below more than once in any 3 year period to show cause** as to why their contract should be re-opened for tendering.
- ❖ New tenders for **all provision called every 10 years.**

## Risk Assessment Contracting – cont.

- ❖ Provider assessment scale determined in relation to **KPIs devised by DET in collaboration with:**
  - ❑ **providers** and
  - ❑ **external experts in both English assessment and public administration.**
  
- ❖ **Independent research project** to research and develop effective and viable KPIs for the next round of contracts, including **appropriate & viable assessment of progress in English language learning.**

## Within and Beyond DET:

5. **Discrete DET section/unit** with mission primarily directed to **coherent, quality English language & literacy provision** (AMEP, SEE, Refugee Youth Task Force, TAFE, HE, community), within which employment goals have a place as relevant
6. **Interdepartmental Committee** tasked to **co-ordinate English language programs** with **other Settlement Services**
7. **Reporting** from **DET section/unit** and **inter-departmental Committee** through **National Settlement Framework (NSF) governance structure** against **NSF Outcomes**

## Overcoming Fragmentation & Incoherence: *Elaboration*

Body	Program	Target Group	Learner Level
DET	Adult Migrant English Program (AMEP)	English language learners in first 5-6 years after arrival	ACSF 0 <sup>+</sup> to 3 or equivalent measure
	Skills for Education & Employment (SEE) Program	Schooling mostly in Australia, <b>job seekers with basic literacy &amp; numeracy needs</b>	ACSF 0 <sup>+</sup> to 3
VET & HE institutions	Foundation & enabling courses	<b>On pathway</b> to mainstream education & training, including qualifications upgrading	<ul style="list-style-type: none"> <li>• ACSF 4 &amp; above</li> <li>• Below ACSF 4 for long-term residents &amp; those schooled mainly in Australia</li> </ul>
	Bridging courses	Migrants seeking <b>recognition of overseas qualifications</b>	ACSF 4 & above
DET /Social Services / Local Govts	Community Programs e.g. Community Hubs	Specific <b>locally focused groups</b> (e.g. mothers with young children)	Any but probably lower levels



## AMEP entitlements based on English language level & previous education: *Elaboration*

LEARNER GROUP	LEARNER CRITERIA	STARTING ACSF LEVEL	TUITION ENTITLEMENTS	CENTRELINK & OTHER SUPPORT
1.	<ul style="list-style-type: none"> <li><b>Aged 18+</b></li> <li><b>Schooling equivalent to Year 10 or above.</b></li> </ul>	ACSF 0	400 hours x 3 = <b>1,200 hours</b>	<i>All support (child care; living allowance) dependent on provider reports to Centrelink on individuals' completion of every 200 hours (based on revised KPIs).</i>
		ACSF 1	400 hours x 2 = <b>800 hours</b>	
		ACSF 2	<b>400 hours</b>	
2.	<ul style="list-style-type: none"> <li><b>Aged 18+</b></li> <li><b>Schooling equivalent to Years 4 -10.</b></li> </ul>	ACSF 0 (a few people may be a little higher)	as per Group 1 plus a further 600 hours = <b>1,800 hours</b>	
3.	<ul style="list-style-type: none"> <li><b>Aged 15+</b></li> <li><b>Schooling less than Year 4</b></li> </ul>	ACSF 0 (or 0 <sup>-</sup> )	as per Group 1 plus a further 1,200 hours = <b>2,200 hours</b>	