

Forum to Discuss Issues Regarding the Evaluation of the AMEP “New Business Model”

Sponsored by the Australian Council of TESOL Associations (ACTA) *in collaboration with* the Sydney School of Education and Social Work (University of Sydney), and the School of Education at the University of Technology Sydney (UTS)

OLD TEACHERS’ COLLEGE, MANNING ROAD, UNIVERSITY OF SYDNEY

2ND MARCH 2019

NOTES FROM DISCUSSIONS

*The following notes are transcribed more or less verbatim from hand-written notes on group discussions that were handed to the Forum convenor, together with records of whole group discussion on the whiteboard. These are organised below roughly according to similar points or topics, which are identified by **headings** and **bolding**. Straight repetition has been eliminated. Occasionally grammar, word choice and sentences have been slightly altered to clarify or elaborate points. No attempt has been made to eliminate contradictions, disagreements or points that seem irrelevant to the session focus.*

9.35 – 10.45: Item 1 - the ACSF

Topic: *The appropriateness, effectiveness and practicality of utilising the ACSF as a benchmark in initial, progressive and exit assessments; the use of the ACSF in aligning the AMEP and SEE Program through a common assessment framework for English proficiency; the place of the ACSF in the wider VET system; the validity and reliability of using data based on any assessments of student progress as a benchmark or Key Performance Indicator.*

NOTES FROM SMALL GROUP DISCUSSIONS (4 GROUPS)

The purpose of the AMEP is as an English language and a settlement program. The ACSF does not support the purpose of the Program or help measure Program outcomes. The ACSF subverts this purpose.

Dominance/inclusion of job-seeking skills can be a problem for AMEP students. The ACSF does not make students more employable. It is important that the AMEP continues to focus on settlement issues. Students need to settle in the country to be able to focus on employment.

There is an increasing emphasis on employment skills and the desire to make a seamless transition to the SEE Program BUT does even SEE get people jobs?

Achieving **functional English** is completely different from settlement.

510 hours is insufficient to achieve functional English, especially starting from NYA or PLA.

10 hours is inadequate for pre-level ACSF students.

The ACSF doesn’t add anything to or complement the current CSWE curriculum. It’s not going to make the students more employable. The **students are more interested in passing units** in the curriculum rather than hearing about ACSF indicators. The majority of our students are low-level, so ACSF assessments are really not helpful to them because they will need to **continue into ESL classes which use the ISLPR for assessment**, not the ACSF.

What purpose does the ACSF have when clients finish their course? There are questions around the purpose of the alignment of the AMEP to the SEE or vocational courses. **The ACSF does not facilitate movement of clients to vocational courses.** There are questions regarding the government’s assumption that the ACSF provides any added value to students moving to vocational courses. The marketization of VET courses means that **RTOs & TAFEs take no account of AMEP ACSF assessments** because they want to attract as many students as possible and get them through their own courses.

The students would benefit from more text types (according to their feedback), so we have mixed feelings about it.

The ACSF is becoming **the de facto curriculum in the AMEP**. You end up teaching students from the assessments and the items required by the particular ACSF indicator. The ACSF is not improving the quality of teaching at all.

The introduction of the ACSF has increased the **workload for teachers**. The extension of the ACSF to the AMEP has become unworkable for AMEP teachers. Additional work includes excessive reporting, creating assessment tasks to support the program (integrating curriculum requirements with the ACSF), etc.

The introduction of the ACSF as an entry benchmark to replace the ISLPR was a disaster because it meant **all 60,000 students in the AMEP had to be re-assessed**. And there was **no data management system** to support this.

Curriculum + ACSF  **excessive assessment**. Massive amount of time needed to develop validated tasks. There is **double reporting** against both the curriculum and ACSF. Onerous levels of documentation and reporting, e.g. producing whole transcripts of discussions, highlighting language features.

Insufficient and inappropriate assessment resources. Resources include inappropriate assessments used previously. Assessment tools continue to **assume language/cultural knowledge** that AMEP students do not have, being newly arrived migrants in Australia, e.g. use of Medicare Card in the entry assessment; other examples can be provided. The ACSF is irrelevant to the AMEP because it's **an LLN [= language, literacy & numeracy] framework**. It's a mismatch. It is the wrong tool to be measuring student progress in an English language acquisition program such as the AMEP

Students' literacy in L1 is an issue. If low literacy, they need to build higher levels of spoken English to achieve the literacy outcomes, e.g. low proficiency students shouldn't be expected to name the genre, purpose, intended audience and level of formality of a text. Sometimes teachers can't do this accurately! The old CSWE did not require students to answer these types of questions, e.g. "mode" (LO1).

When you're the ACSF P.A. [=prior assessor?], do you give them feedback? Very generally (in the skill).

The ACSF doesn't reflect learner progress because **only one indicator is assessed at a time** but students are developing in all skills at the same time. ACSF levels do not capture the small language gains that clients make as they progress through their 510 hours. ACSF levels of clients at the end of the 510 hrs are not necessarily a true reflection of clients' levels across all macro skills. To what extent can any assessment scale capture students' progress in language acquisition and proficiency in the time available?

The ACSF is not an English language framework. Unlike the ISLPR, it cannot differentiate between learners with high level L1 literacy & numeracy skills and those who are learning literacy.

Questions regarding the KPI of learner progress? Does it measure provider quality? Why does progress need to be a KPI?

It is difficult to capture learner progress because of the different linguistic backgrounds that influence their English language development.

The interpretation by QA auditors of ACSF indicators is arbitrary and inconsistent. This makes it problematic to have consistent tasks. The way we conduct assessments is determined by the QA provider's interpretation of the ACSF. The reliability of assessments is questionable. Appealing against audits is lengthy.

The Department does not fundamentally understand the ACSF.

The disregard of the client journey and background in both the ACSF and the auditing process is detrimental to the Program. **The point of the ACSF is compliance** rather than helping newly arrived migrants.

Provider managements are not listening to practitioner concerns. Has led to work-to-rule in some Qld Institutes because of teacher stress & anxiety.

Teachers are being exploited in the workplace. Not a teacher's job to spend hours phoning students to find out why they haven't attended class.

The SEE Program = labour market program i.e. preparing people for employment regardless of client type. In the SEE and CSWE, the ACSF is reasonably rigorous and can be adapted to the CSWE.

The ISLPR is a placement tool and to assess eligibility (if people have more than functional English, they are not eligible).

In our group, two members were practising AMEP teachers. One was satisfied with the ACSF and only concerned about the **onerous documentation of assessments**. The other was not satisfied with the ACSF and was concerned about **indicators such as**:

- identifying the level of formality of texts
- identifying attitudinal words
- identifying and explaining the genre of texts
- identifying and explaining the purpose of texts.

These may be appropriate for L1 English students but it means teachers end up spoon-feeding answers to these questions. It distracts students from using their actual L2 English language skills.

Onerous documentation, e.g. needing to provide transcripts of oral tasks with various language features highlighted or examples supplied. This amounts to hours of work per student with the threat of "auditing" hanging over people.

11.10-12.30: Item 2 - Curriculum now used in the AMEP

Topic: *Appropriateness, effectiveness and practicality of current curriculum and curricular options in the "targeted tuition streams" ("Social English" and "Pre-Employment"); the impact of both the ACSF and DET policy on "aligning" the AMEP with the SEE Program and to regulate the AMEP within the wider VET system.*

NOTES FROM SMALL GROUP DISCUSSIONS (3 GROUPS)

1. Streams

Issues caused by the tuition streams:

- The Program has witnessed two major displacements **1) from settlement to employment 2) from English language acquisition to literacy**
- Loss of ability **to deliver and focus on real life skills** in the Program
- Reality of student needs is not being addressed due to the focus on tuition streams and push for employment outcomes - **providers have less ability to address student needs.**
- **Added reporting burdens** for AMEP providers particularly in relation to class placements, where students language proficiency abilities (or needs) that fall into different streams cannot be placed in the same class - providers are then required to apply for permission to deliver blended (social/pre-employment), another layer of reporting

Streams are a fiction. They are a "disconnect". They are a façade. Reporting on them is done just for contract compliance.

Streams are **a bureaucratic nightmare** and of no benefit to students.

Streams inhibit rather than promote flexibility.

Streams are meaningless **at lower levels**.

The “social stream” is about watering down curriculum – no accredited curriculum, lower teacher qualifications. It was a cost-cutting measure to allow the introduction of “trainers”.

“Pre-employment stream” is about getting students with Mutual Obligation requirements into jobs as soon as possible. It is detrimental to push them into employment too soon. They remain very vulnerable and are stuck with very low English.

Depending on the cohort, the CSWE or curriculum could impact on the social and pre-employment streams.

Streams in actual practice:

Streaming? Our classes for students blend the streams.

Streaming depends on the demographic.

Contract requirements have to be met i.e. we need to have separate streams. But class sizes don't support this, so we have **blended classes**. There are lots of problems from separating streams, e.g. choice of units, offering per term. It doesn't work.

It depends on how many students we have. The units we chose can be adaptive and suit both cohorts. It depends on numbers and how colleges are interpreting the 2 streams, then adapting their teaching to suit students' needs. It depends on the provider's focus. Some providers are broad-minded and other have their own directives.

Choice for students:

Do students really have a choice of streams? **Does the provider choose? Or the Job Search people who refer students? Are we working to meet government needs or student needs?**

Students don't choose their streams – no flexibility.

The main aim is to maximise class sizes in order to maximise revenue. The same reasons for encouraging attendance and following up on absences.

Streaming has entailed **micro-management from Canberra** with phone calls questioning numbers in the pre-employment stream because student allowances are slightly higher.

2. Curriculum

The current AMEP business model encourages **the ACSF to become the curriculum in the AMEP by proxy**.

Issues with the LWA review of the curricula. The review conflates Foundation Skills (literacy) with language learning (English as a Second Language). This is obvious in the review's recommendations of CSL as a suitable curriculum for the program.

(i) The CSWE

Accredited by ASQA. ASQA does not allow:

- any accredited curriculum to duplicate the FSK or align to the ACSF in its content
- conflating Foundation Skills and LLN
- alignment with the ACSF.

Hence the **CSWE continues to align closely with ISLPR**, which is more appropriate to the needs of English as a Second Language learners.

In our group, some said the new CSWE curriculum is **challenging to teach**.

It seems it was produced in a rush.

Flexibility: some said it lacks flexibility but others said it is much more flexible and has more options for variety.

CSWE curriculum can be contextualised to focus on different needs – not everyone agrees with this.

Ability to work flexibly with CSWE depends on **sound TESOL teacher education**. Providers and teachers who don't have good backgrounds in TESOL are liable to interpret everything narrowly and not understand how curriculum should be used.

The new CSWE does allow more time to teach more deeply in one unit as it has more hours e.g. 120.

Resources:

One challenge is that there are **not enough resources** aligned to course delivery.

Some people are still side-tracked in the sense that they feel they need to teach from the amended requirements but the CSWE workbook does not support the new curriculum.

Current publications don't support the current CSWE curriculum. We need new resources and updated publications.

We have to teach to higher levels than before. But assessments don't reflect that the unit is at a higher level.

(ii) The EAL

Accredited by the Victorian Skills Authority - heavily based on CSWE - work focused competencies - aligns better with the ACSF.

(iii) The CSL

Accredited by ASQA. A Foundation Skills curriculum, aligns with the ACSF but is **highly inappropriate for the AMEP and English as a Second Language learners**. It appears to be a converted literacy training package hastily adapted for ESL. It does not meet the same ASQA requirements as those strictly enforced in re-accrediting the CSWE. Aside from being inappropriate for ESL learners, it illustrates that ASQA requirements are inconsistent and depend on individual auditors.

It reflects the same confusion as in the ACSF in **conflating Foundation Skills with learning English**.

(iii) In general

There is a **focus on employment to the detriment of settlement**.

There is a **reduction in the ability to deal with the psychological needs of traumatised students because there is no longer a proper Counselling service to do referrals**.

A loss of ability to teach general Australian life skills. E.g. two AMEP students drowned at NSW & Qld beaches this summer. Providers used to have life savers come to talk to students but they can't include this now because it's not in the curriculum or ACSF, so no time and discouraged.

Workload for teachers is excessive.

On the one hand we have the reality of student needs. On the other, a curriculum system that is not fit for purpose.

The Government wants programs that can be measured. How do we measure settlement outcomes?

The AMEP should be an ESOL program. SEE should be for job-seekers needing LLN and who have been here longer or school has failed them. SEE is not a pathway from the AMEP. AMEP graduates should be given enough English tuition so that they can go straight into VET bridging or mainstream courses.

The following notes were tabled at the Forum

Curriculum Concerns

The main issues relate to the introduction of the ACSF as the benchmark against which student progress in the AMEP is measured.

(1) The Conflation of Foundation Skills with Learning English as an Additional language

Foundation Skills are the ability of a person to read, write, communicate orally, to use mathematical knowledge in social contexts in their life (i.e. numeracy) and to be able to learn, in addition to a variety of soft skills such as technology skills, self-management skills etc. Foundation Skills assumes a person has already acquired language and just needs to learn to be able to use that language better.

English language acquisition is not the same because English language learners do not have the language to be able express themselves in English. They may be able to read, write, communicate orally, learn and use mathematical knowledge very well in their own language. Learning English as an additional language requires different skills and approaches to learning Foundation Skills.

The focus on Foundation Skills rather than Learning English as an Additional Language leads to the choice of unsuitable curricula through which to deliver the program (see next point) and also therefore the loss of settlement focus of the program. In other words AMEP clients do not have their settlement and language needs met, which in turn impacts their migration experience and their ability to find and maintain suitable work.

(2) Unsuitable Curricula

Many providers are turning to curricula that allow easy reporting against the ACSF as their first consideration in choice of curriculum through which to deliver the AMEP, instead of whether the curricula are fit for purpose for teaching English as an additional language to people who need to learn English.

Consequences are:

- AMEP students are being taught English through Foundation Skills or General Studies curricula – i.e. unsuitable curricula
- The English language learning needs of AMEP students are not being best served by such curricula because curriculum outcomes are not designed specifically to teach English as an additional language
- These courses often involve compulsory numeracy units, may see AMEP students in mixed cohort classes, over focus upon literacy, assume pre-existing language and cultural knowledge, include general studies elective units that are irrelevant for language learning
- AMEP students may be taught by unqualified teachers – e.g. in the “social stream”
- AMEP students end up getting frustrated and complain, teachers get frustrated as they can see that students are not getting what they need
- Settlement focus of the program is completely lost
- Over focus upon employment and getting jobs – turning the program into a labour market program

Examples of unsuitable curricula are the Core Skills for Learning Curriculum (CSL), the Foundation Skills Training Package, the Certificates in General Education for Adults.

Suitable curricula:

- Focus on teaching English as an additional language to people who need to learn English
- Contain purposefully designed units of competence that focus on teaching the relevant English as an additional language skills – i.e. focus on acquiring oral and written language, grammar, pronunciation, language learning, digital literacy, language use in social context
- Benchmark the progress of students against measurable and specific language learning outcomes
- Provide clear guidelines on assessment
- Require appropriately trained staff to teach them – i.e. should specify appropriate university teacher qualifications
- Can be adapted to meet the needs of different cohorts of non-English speaking background learners
- Allow focus on settlement as well as pathways to further study and employment

Suitable curricula for the AMEP include the Certificates in Spoken and Written English, English as an Additional Language Framework, Certificates in English Proficiency, TAFE NSW ESOL Certificates.

(3) The ACSF becomes the curriculum by proxy

Because of the way that Functional English is now legislated, and from there that the way the KPIs are set up and audited in the program, client progress is measured against the ACSF.

The KPIs of Attainment and Assessment require reporting against the ACSF. Auditing assessment against the ACSF adds nothing to the program and nothing to students' language learning. It creates over-assessment as the students' attainment must be reported against curriculum requirements *and* the ACSF. The focus of the program shifts from teaching and learning to reporting and this is detrimental all round.

English language learning curricula are not usually benchmarked to the ACSF as it does not properly measure English language acquisition. Because the program is so tightly and frequently audited against the ACSF, the ACSF ends up becoming the curriculum because it dictates teaching, learning and assessment. Providers must meet their KPIs of reporting against the ACSF so therefore they must teach to their ACSF reporting requirements if they are to meet their KPIs, even if this means over assessment and loss of focus on student needs.

None of this is necessary as the VET sector is already heavily compliance driven. If providers are delivering quality education, they must meet their requirements against the Standards for Registered Training Organisations as administered by ASQA, which include standards for quality and valid assessment against the relevant nationally accredited curriculum outcomes.

1.20-2.30pm: Item 3 - Teacher qualifications

Topic: *Stipulated program, curriculum licencing and regulatory requirements, including the VET Certificate IV in Training & Assessment.*

NOTES FROM SMALL GROUP DISCUSSIONS (3 GROUPS)

1. Cert IV TAE

Common issues providers experience in relation to teacher qualification requirements:

The TAE is a requirement for the VET sector. Teaching English as a Second Language is wrongly categorised by ASQA under the VET sector. There is lack of consistent financial support for covering the cost of TAE upgrades. TAE qualifications require updating on a very regular basis, a requirement that does not exist in any other field.

1.1 Re level & relevance of Cert IV TAE:

TAE requirement fails to distinguish between **mandatory quals.** and **minimum quals.**

The main point is that we don't think the TAE Cert IV is **relevant to qualified ESL teachers.** All TESOL qualifications learn the skills covered in the TAE so the TAE is teaching people to "suck eggs".

How can you compare a **Cert. IV with a Master's degree**, which many ESL teachers have?

The TAE is suitable for people who lack degrees or other teaching qualifications. It's designed for trades teachers.

The TAE doesn't differentiate between teachers with no teaching qualifications and those already trained.

The Cert IV TAE is not PD. There should be **appropriate and relevant PD for AMEP teachers.** There is little PD in areas that teachers actually need. The time spent doing the Cert IV deflects teachers and providers from useful PD.

Teaching experience and specialist/high level PD should be the main currency after gaining quals.

One aspect of the Cert IV that is helpful is learning about the units of competency framework and assessment requirements that you have to follow in doing assessments. **Mapping assessments to curriculum outcomes is probably relevant, given the AMEP is currently sitting in the VET sector.** But couldn't this be covered by less expensive and time-demanding PD?

The defunding of adult TESOL/literacy qualifications in universities and them becoming full-fee paying is **reducing demand for university-based TESOL qualifications.** Also the current situation in the AMEP and SEE program: why would anyone pay to qualify as a casual teacher, especially as things are now? So we may end up with Cert 4 being needed. A race to the bottom.

The TAE trainers and assessors are not TESOL-trained. **The teachers assessed by TAE trainers are better qualified and more knowledgeable than the trainers are.**

1.2 Re upgrades:

It's **a waste of teacher time and money** doing endless TAE upgrades.

Teachers are going to the **cheapest and quickest providers to get their TAE upgrade.**

TAE: onus is on the teachers to do it in their own time and often at their own expense. This is unfair, especially when they don't feel they benefit.

If you're a plumber or electrician, you don't need to constantly upgrade your initial qualification although you may need to do further qualifications or PD. **Why do TESOL teachers need to constantly upgrade the same qualification every time it's revised?**

1.3 Re inconsistencies and suspect practices:

The ASQA requirement is a **Cert IV, Diploma or higher qualification in adult ed.** So why do TESOL qualified teachers need to do the TAE?

Major problems are **inconsistency re quality, time taken/needed by different RTOs and cost.**

Are TWA upgrade requirements simply a **cash cow**?

It's well-known that **some RTOs will sign off on upgrades simply for payment.**

2. Comments re TESOL Quals.

Quality providers and TESOL practitioners are concerned about the **deskilling of the profession** due to:

1) full-fee for TESOL qualifications - the financial costs of teaching qualifications such as TESOL is burdensome for teachers that mostly work on casual conditions. There is a need for government subsidy to pursue such qualifications.

2) watering down teacher qualification requirements to save costs in the AMEP by accepting lower qualifications in the AMEP Social English stream. This is now supported by accredited curricula such as CSL. The CSL does not require a teacher to have a TESOL qualification.

Contracts should not stipulate qualifications. They should be specified by the curriculum and monitored by ASQA.

Teachers of English as an Additional Language (EAL) should be highly qualified:

- meet ASQA requirements
- have done a practicum

The DET requirement for qualifications in **adult TESOL**: is this valid or is it better for teachers from different sectors to be mixed and learn from each other? Is there a difference between adult TESOL and school TESOL? Shouldn't a good teacher education program prepare people for both?

Overseas qualifications that have been acceptable for years are now being questioned and teachers are being required to requalify. A devastating impact on morale.

Auditing of TESOL qualifications

Qualification auditing by LWA and others is problematic because **some auditors don't have an understanding of relevant qualifications in TESOL.** NEAS's loss of the QA contract has had an adverse impact on recognition of teachers' qualifications. LWA's list only includes current qualifications. But over time universities have changed the names and structure of their qualifications. Auditors need to understand **the actual content of qualifications.** Some highly experienced teachers with good qualifications from years past are being told their qualifications aren't recognised. This is incredibly stressful.

The following notes were tabled at the Forum

Teacher Qualifications Issues

Unsuitable curricula often have unsuitable teacher qualifications requirements – i.e. don't require teachers to have genuine TESOL qualifications to deliver. Because of the streaming in the program, a person may be delivering the social stream and not have any TESOL training at all, e.g. if they are delivering Core Skills for Learning Courses or the Foundation Skills Training package.

The currently listed qualifications for the program are vague, inaccurate and misleading:

- i) a three year Australian undergraduate degree and a post graduate TESOL qualification (or equivalent), as well as any additional qualification requirements for assessors under the Standards for Registered Training Organisations (RTOs) 2015 (Service Provider Instructions, p18)

- ii) **Personnel teaching in the Pre-Employment English Stream:** an Australian undergraduate degree or equivalent and a post graduate TESOL Qualification in adult education;
Personnel teaching in the Social English Stream: Australian undergraduate degree or equivalent and is enrolled in a post graduate TESOL course in adult education (Contract Reference clause 2.41, Service Provider Instructions p35)

These requirements have proved difficult to implement, to monitor and to audit. The current QA process is simplistic, ad hoc and ill-informed in relation to teacher qualifications, often relying on the name of the qualification itself to inform the auditor of whether or not a person is qualified. This misses the fact that many TESOL qualifications, particularly older qualifications or those gained overseas, often do not have TESOL or adult education in the qualification name – e.g. Master of Education, Master of Educational Studies, Master of Letters, Master of Arts. The Department now recognises this and has started to build a list of suitable qualifications but it is incomplete.

Transcripts of study are not examined and they should be. There are no guidelines as to what the essential components of TESOL study should be. There has been no consultation of relevant TESOL academic experts, e.g. ACTA, to ascertain the essential areas of study in a TESOL qualification.

Qualifications need to be sufficiently rigorous to ensure that teachers on the program are properly trained so as to deliver the best for the students. But the qualifications requirements cannot be too onerous so as to exclude capable teachers, particularly for rural and remote areas where the program still must be delivered, or for people who have taught on the program for a long time already.

Suitable qualifications would include postgraduate or undergraduate TESOL study as part of a formal AQF benchmarked qualification (AQF 7 or higher) at a recognised tertiary institution. Suitable units of study would include theory of language, structure and grammar of English, second language acquisition studies, TESOL methodology, teaching practicum (for initial service degrees in particular), English pronunciation, and subjects from other relevant subject areas such as applied linguistics, testing and evaluation, resource development, curriculum and syllabus design, adult education and literacy and numeracy teaching.

Unsuitable qualifications include the Cambridge TESOL certificate (CELTA, the old RSA, TEFL), a Certificate IV in TESOL, TAE Certificate IV with the adult literacy unit TAELN411. While such qualifications may provide practical experience in planning, engaging and managing classes, they do not provide the depth of understanding of language, language learning, adult learning, curriculum, assessment and teaching methodology.

Many teachers also do not understand the difference between program requirements and ASQA requirements. The TAE and the recent upgrades to the TAE Certificate IV are ASQA requirements. There are exemptions for people with tertiary qualifications in TESOL or adult education listed on the ASQA website. An up to date TAE is required to teach in any Registered Training Organisation.

2.30 – 3.45: Item 4: Competitive contracting and the “multi-provider” model

Topic: *The appropriateness, effectiveness, value and viability of the current multi-provider service delivery model in the AMEP; whether it should be extended to other regions; its place in the overall competitive contracting model used to deliver the AMEP.*

NOTES FROM SMALL GROUP DISCUSSIONS (2 GROUPS)

1. Competitive contracting

1.1 Rationale:

Competition aims to give consumers choice. Supposedly “consumer” choice but who is actually doing the choosing?

Clear focus on outcomes.

Competitive tendering has put downward pressure on all providers, private and government.

1.2 Disruption:

- Discontinuity for students
- Loss of jobs for teachers and support staff
- Loss of AMEP DL students, 80% drop in DL student numbers compared to the previous contract
- Changes to childcare providers increased the trauma of students.

The multi-provider model isn't a bad thing in itself but the constant re-tendering and subsequent changes of provider are.

1.3 Effects:

It's a problem when students move from one provider to another when a tender is lost or gained. Students get very stressed about the disruptions, going to a new place, etc. etc. Some drop out. They have already experienced major disruptions in their lives and so the impact can be large.

Students from trauma backgrounds experience disruption and uncertainty – just getting comfortable in one place and then everything changes and they have to go to the new places. They suffer again. The disruption has far-reaching consequences for students, for example with child care arrangements.

Constant competition/tendering doesn't work for anyone, the teachers included. Teachers moving from one provider to another following the contracts is incredibly difficult because they have to learn a new working environment, administration and culture. It's a different situation with each provider. It impacts on the quality of program delivery, skills, resources, systems, facilities are lost. Getting student records across to a new contract holder is a major headache.

There needs to be better and longer transition allowances and processes built into contracts. The Dept. took 6 months to decide on the new contracts and gave providers two months to implement them – totally out of proportion.

Subcontracting is a concern.

1.4 Hidden costs in competitive tendering:

Un-costed support systems – applicable to TAFE NSW, student services such as counselling, disability and library access, amongst others are offered to AMEP students (as TAFE Students) although not costed or required by the AMEP contract. While not required by the contract, these services have been essential in supporting the students with their settlement, particularly counselling and disability services.

There has been a **loss of AMEP providers in areas with less demand**, such as the Illawarra and the NSW South Coast. No provision because the providers can't make a profit. Many students there aren't eligible for Smart & Skilled ESOL programs.

Change-overs give rise to **massive waste** e.g. dumping of resources, computers given away, new venues hired or built, dumped providers hire their rooms to new providers at higher cost.

2. Multi-provider model

The collaboration that existed between TAFE and NAVITAS in the previous contract has now disappeared due to the multi-provider model, which has put the two providers in competition. Previously Navitas held the AMEP contract and TAFE provided a pathway into VET. **Now they compete and there is little room for co-operation.**

So does this provide choice for students?

The claim that AMEP clients choose provider is not valid. More often than not, AMEP students are unable to make an informed choice due to their English language proficiency and knowledge of the system. The choice is made for them by referring agencies such as humanitarian settlement services and Job Active providers. The latter frequently work without interpreters so the client has no clue as to why they are referred to Navitas or TAFE NSW.

Because Navitas held the AMEP contract for so long in SW Sydney before the current contract, their name had become synonymous with the AMEP. Migrants and Job Active didn't know any better. **It's taken TAFE NSW a long time to break through this.**
