



AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

SUBMISSION TO

THE VOCATIONAL EDUCATION AND TRAINING REVIEW

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ABBREVIATIONS

ACTA	Australian Council of TESOL Associations
ACSF	Australian Core Skills Framework
AMEP	Adult Migrant English Program
ASQA	Australian Skills Quality Authority
CSL	Core Skills for Learning Framework
CSWE	Certificates in Spoken and Written English
DET	(Commonwealth) Department of Education and Training
EAL/D	English as an additional language/dialect
ISLPR	International Second Language Proficiency Rating Scale
KPI(s)	Key Performance Indicator(s)
LLN	Language, literacy and numeracy
LWA	Linda Wise & Associates
PTA	Prior Training Assessment
SEE (Program)	Skills for Education and Employment (Program)
TAE	(Certificate) in Training and Assessment
TAFE	Technical and Further Education (Institutes)
TESOL	Teaching English to speakers of other languages
TOIL	Time off in lieu (of unpaid overtime)
VET	Vocational Education and Training

RECOMMENDATIONS

Recommendation 1: The AMEP should be located within policy-making and provision in the Education and Training portfolio. This location should be exploited to strengthen and further develop pathways from the AMEP into vocational training, higher education and employment. However, the Program's distinctive role in integrating tuition in English as a second/additional language (which is not synonymous with teaching literacy) with broad settlement objectives, and its unique contribution to social cohesion in Australia, must be acknowledged, and therefore govern its Program goals, intended outcomes, management, Quality Assurance, curriculum, assessment and teaching methodologies.

Recommendation 2: The SEE Program should be reviewed with the aim of discovering who its clients actually are and how best their learning goals might be achieved. This review would entail:

- i. scrutiny of eligibility requirements and inconsistencies,
- ii. distinguishing between different client groups in regard to their starting points, and on that basis determining viable learning trajectories towards training, education and employment, and
- iii. rethinking and revising the Program to ensure coherent and feasible pathways, goals and desired outcomes for clearly identified target groups.

Recommendation 3: The Expert Review should investigate and evaluate the contribution of the Certificate IV in Training and Assessment to Quality Assurance in the VET sector.

Recommendation 4: The TAFE Certificate in Training & Assessment should not be required for those who hold higher or equivalent TESOL teaching qualifications.

Recommendation 5: The Review should include clear recommendations on how the VET regulatory framework should ensure that providers' physical facilities are regularly and effectively monitored to ensure maintenance of basic standards.

Recommendation 6: A clear, transparent and confidential procedure should be instituted and widely publicised, by which those affected by clearly sub-standard Centre facilities can report on these facilities.

Recommendation 7: AMEP and SEE contracts should only be awarded following inspection and verification that adequate facilities exist to support a teaching program.

Recommendation 8: Assessments of learner progress in the AMEP and SEE Program should not be used as the basis of any KPI.

Recommendation 9: The ACSF should be discontinued within the AMEP, pending an independent expert review of its validity and reliability as an assessment tool and, further, as a framework for assessing learning English as a second/additional language. This review should be tasked with developing recommendations on how progress in *learning English as a second/additional language* (as distinct from literacy or job-readiness) should be assessed within the AMEP and SEE Program in ways that are both credible and positive for students, their English teachers, other educational institutions (VET and higher education) and employers.

Recommendation 10: The Review should inquire into the extent to which the ACSF has currency within the wider VET system and if so, the function it serves, including as an assessment tool and/or as recognised certification for entry to other programs and/or employment. If these functions cannot be ascertained, a prima facie case exists for immediately discontinuing the ACSF as an assessment tool, at least in the AMEP.

Recommendation 11: The Review's recommendations on improvements to the VET regulatory framework should address ways in which vulnerable low-paid employees can be protected from exploitation and can gain redress without penalising their employment. This framework should include effective monitoring to ensure all employees have clear information about how to seek redress.

Recommendation 12: The Review's recommendations on improvements to the VET regulatory framework should address ways of ensuring that, on the one hand, volunteers are not used to replace teachers but, on the other, are appropriately encouraged, deployed and supported.

Introduction

The Australian Council of TESOL Associations (ACTA) is pleased to make this submission to the *Review of Vocational Education & Training* (VET).¹ ACTA is the peak professional body concerned with the teaching of English to speakers of other languages (TESOL).² The Council comprises representatives from State and Territory TESOL associations, including their presidents. Association members include teachers, consultants, curriculum developers, teacher educators, other academics and researchers in the TESOL field in tertiary, VET and community education, and school and pre-school settings.

The submission draws on a comprehensive survey that ACTA is currently conducting into the provision of English to adult migrants in the Adult Migrant English Program (AMEP) and the Skills for Employment and Education (SEE) Program.³ These Programs are delivered on the basis of contracts competitively awarded by the Department of Education & Employment (DET) by a variety of TAFE and private for-profit and not-for-profit providers within the VET sector.

Although the closing date for our survey is 28th January 2019 (i.e. after the close of submissions to the VET Review), we have already received a significant number of responses (421) with a 70% (n = 295) completion rate. We believe these raw data are indicative and therefore present some preliminary observations and conclusions relevant to the following VET Review terms of reference:

- “regulatory settings” (within Reference 1)
- “the flexibility of qualification structures” (within Reference 4)
- “additional support needed for vulnerable cohorts, including those currently unemployed and at risk of unemployment, or those with low literacy and numeracy skills.” (Reference 6)

In regard to References 1 and 4, and in contrast to “case studies of best practice” (Reference 7), our survey data provide disturbing indications of “worst” practice in education and training. ACTA hopes that the Inquiry will address these problems as a matter of urgency.

ACTA is aware that vital support for English language learners in the VET sector extends well beyond the AMEP and SEE Program, most significantly in Foundation Studies programs and concurrent support for on-going students in VET settings. It is precisely at this point that many exiting the AMEP and SEE Program are most vulnerable: they have gained basic English for survival but not nearly enough to propel them along the road into so-called “mainstream” training and education. As one of our survey respondents described:

It seems to me there is a large gap in appropriate programs and access to workplace English plus vocational skills programs for learners post settlement. Past students often return having used AMEP funding and years down the track are seeking to move from low skilled labour but do not have the language skills particularly in reading and writing for vocational programs. This appears to apply particularly for women who have had numbers of children during their early settlement and AMEP entitlements have been used in a fragmented way. It is also evident in both women and men who have arrived with little or no formal education in their first language. Men who have trade based skills have great difficulty transferring that to related employment, again often to do with practical rather than formal training and English competency to undertake trade education in Australia. (Appendix 10, Comment 72)

¹ Henceforth “the Review”.

² <http://www.tesol.org.au/>

³ <https://www.surveymonkey.com/r/HMR5QTQ>

ACTA therefore greatly regrets that, for the purposes of this submission and in the time available, we are unable to gather evidence from our affiliate members that would contribute to the Review's consideration of VET provision for English language learners beyond the AMEP and SEE Program. Informally, we are aware of exemplary "best practice" in some TAFE settings but also that significant gaps exist.

In fact, gathering such evidence would be a major exercise, because of the dispersed nature of programs within autonomous and semi-autonomous institutions and RTOs. However, given that the Review has been directed to consider support for "vulnerable cohorts", ACTA hopes that some of the Review's resources can be put to a systematic investigation into best practice and the structural and local stumbling blocks for English language learners on their pathways through the VET sector. We look forward to seeing recommendations for this crucial and largely hidden aspect of VET provision.⁴

ACTA is also aware of the problem of fraudulent and semi-fraudulent RTOs to which highly motivated English language learners (among others) can be attracted by glossy brochures and hand-outs but which offer little or nothing in the way of quality programs. Our survey data contains some disturbing evidence regarding those holding AMEP and SEE Program contracts, but in the time available we are unable to undertake a systematic analysis of this material. We therefore also hope that the Review will address this problem.

Following a description of the AMEP and SEE Program and the ACTA survey respondents, this submission addresses the following issues, all of which relate to "regulatory settings":

1. The ASQA requirement that all VET sector teachers hold the TAFE Certificate in Training & Assessment (which also relates to "flexibility of qualification structures")
2. Standards of provision – facilities and infrastructure
3. Use of student progress assessments as the basis of a Key Performance Indicator (KPI)
4. Working conditions.

The Adult Migrant English Program (AMEP) and Skills for Education & Employment (SEE) Program

The AMEP and SEE Program make a significant contribution to the development of "skills and employment outcomes" through, within and beyond the VET sector (Reference 1).

(1) The AMEP: goals and background

The AMEP is the starting point on the pathway to training, higher education, employment and settlement for newly arrived adult migrants assessed as having less than "functional English". It caters for approximately 60,000 people annually, about 26 percent of whom are humanitarian

⁴ Many of the issues that exist also apply to overseas fee-paying students in both the VET and higher education sectors, about whom ACTA is also greatly concerned. For an excellent coverage of these common issues, go to: <https://theconversation.com/higher-english-entry-standards-for-international-students-wont-necessarily-translate-to-success-110350> The article sums up the areas of need as supporting student in:

all facets of academic, linguistic and social development. These include discipline-specific language, mental health, and culturally appropriate pastoral support throughout their degrees.

See also: "Hot", 'Cold' and 'Warm' supports: towards theorising where refugee students go for assistance at university": https://srhe.tandfonline.com/doi/abs/10.1080/13562517.2017.1332028?needAccess=true&#.XE0uy_xS_m0

entrants.⁵ The Program has been a foundation stone in Australia's successful settlement of migrants since post-War immigration began. From the 1950s until 2013, the AMEP was located within the Immigration portfolio (which had various names). When Immigration was restructured as Immigration & Border Security, then Home Affairs, the AMEP was briefly managed within Social Services but then moved to DET, where it is now.

ACTA strongly believes that the AMEP is best placed within overall policy development and management for education and training, because it permits an integrated and holistic perspective on learner pathways, a persistent problem.

A world leader since it began, the AMEP has consistently led the way as a program that integrates learning English as a second/additional language with settlement and other content to achieve broad social cohesion goals.

The AMEP is *not* a literacy program. Learning another language, in this case English, may or may not include learning literacy. The AMEP caters for a vast range of English language learners from those who are highly literate in their own (and often other) languages to those with minimal/no previous schooling and therefore also minimal/no literacy in any language.⁶ However, common to this whole range of learners, is that tuition content and methodologies are distinct from those involved in teaching literacy to monolingual (or near monolingual) English speakers, because the assumptions about language, including literacy, that the learner brings to learning English are quite different.

(2) The SEE Program: goals and background

The SEE Program grew out of a series of short-term labour market programs in the 1980s, all of which were part of the VET sector, and managed and funded by DET (and its predecessors). The SEE Program is described as contributing “to building Australia's productivity and inclusiveness by providing high quality training to help job seekers address language, literacy and numeracy barriers with the expectation that such improvements will enable them to obtain sustainable employment and/or undertake further education and training.”⁷ The most recent information we can locate on SEE Program numbers is the 2016 ACIL-Allen Review report of 26,000 “annual commencements” in 2013-2014, while 68 percent of those who commenced training from 2010-11 – 2013-14 were classified as “CALD” (culturally & linguistically diverse”) and 8 percent as Indigenous.⁸

In a previous paper, ACTA identified what we consider to be major confusions in the goals and operation of the SEE Program. We have argued that the SEE Program requires complete re-thinking to overcome current anomalies, distortions and inconsistencies. Its eligibility criteria, dependence on Centrelink referrals,⁹ and narrow focus on employment outcomes conflate and fail to meet the very different learning needs of adult migrants, Indigenous learners and monolingual (or near-monolingual) English speakers whose schooling has been all or mostly in Australia. In the time

⁵ <https://www.education.gov.au/background-amep>

⁶ ACTA has elaborated on this point in numerous submissions and other papers. See, for example: ACTA Submission to the Inquiry into Migrant Settlement Outcomes, May 2017 <http://www.tesol.org.au/Advocacy/ADULT-EAL-NEWS-AND-ISSUES>

⁷ <https://www.education.gov.au/background-see-programme>

⁸ https://docs.education.gov.au/system/files/doc/other/see_programme_evaluation_report.pdf p. 39.

⁹ Most egregiously, for example, in insisting that clients attend Centrelink interviews when they have English classes – a problem that has been repeatedly documented. See, for example, <https://cpd.org.au/2017/02/settlingbetter/> p. 23

available, we cannot elaborate on this argument in this submission but refer the Review to our earlier policy paper.¹⁰

(3) Adverse effects of moving the AMEP to the Department of Education and Training

As just stated, ACTA's strong position is that coherent approaches to learner pathways are best facilitated by locating the AMEP within the Education & Training portfolio. However, current DET policy and managerial perspectives fail in precisely the same way as with the SEE Program. Responses to our survey bear out ACTA's previously expressed fears¹¹ that DET's long-standing approach to labour market training would fail to maintain the AMEP's long-standing, crucial and distinctive role and track record in integrating English language tuition with wider settlement functions, recognised for many years as world's best practice. The so-called "alignment" of the AMEP with the SEE Program has imported into the AMEP some of the most problematic aspects of the latter Program, and imposed a narrow "VET perspective" on a program that includes, but is not confined to, employment goals.

Our survey data contains literally hundreds of accounts of shifts in curriculum and assessment under the current contract that fail to cater for adult migrants learning English as a second/additional language, including its settlement dimensions.¹²

This widespread shift is occurring in all curricula for the AMEP, including the CSWE. One example is the 2018 curriculum that TAFE Queensland has mandated for use in the AMEP, as three respondents describe:

(i) *The CSL¹³ is said to align with the ACSF¹⁴ but the sample assessment tasks don't. The sample tasks are very poor and written for literacy students. The curriculum does not suit students with diverse educational and language backgrounds. The nominal hours are totally inappropriate. Teachers have been told to cover a minimum of one CSL unit per term but if you unpack the requirements of units for EAL/D learners¹⁵ it is impossible to do so. This is compounded by a timetable that forces teachers to have less time for the teaching-learning cycle while giving [them] more students to teach. It is then more challenging to integrate Settlement topics, field trips and fun activities.*

(ii) *I know no one that likes it (teachers). The CSL units/tasks favour the native speaker who has cultural knowledge of the Australian environment, and the units actually contain anomalies e.g. in level 3 reading unit, As well, the writing unit for this level is huge and would be a challenge to finish in a 10-week term. (We have given feedback on this.) As teachers we know that one size doesn't fit all. We need a national curriculum designed specifically for the L2 learner that includes the genres they will encounter in their daily/work/study lives, as well as assessment tasks for these. CSL passed registration. I question ASQA's ability to know what's best for ESL learners.*

(iii) *The curriculum was designed for native speakers and is totally inappropriate for AMEP and/ or SEE students. Unrealistic assessment goals mean that we have to drive students through assessment rather than deliver quality learning opportunities. The course was supposed to align to the ACSF but it*

¹⁰ http://www.tesol.org.au/files/files/591_Problems_in_the_AMEP_SEE_Program_25_May_2018_-_an_ACTA_Background_Paper.pdf, p. 23 ff.

¹¹ ACTA Submission to the Inquiry into Migrant Settlement Outcomes, May 2017 <http://www.tesol.org.au/Advocacy/ADULT-EAL-NEWS-AND-ISSUES> section 3.5.3, p. 83ff.

¹² In 2018 DET commissioned a report into curriculum in the AMEP. As far as we can determine, it has not been released publicly. It can be found as a response to Question on notice no. 296, Portfolio question number: SQ18-001000, Senator Doug Cameron 25 October: https://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/ee (A0296_EducationandEmployment_2018-19Supplementarybudgetestimates_EducationandTraining)

¹³ CSL = Core Skills for Learning Framework

¹⁴ ACSF = Australian Core Skills Framework, mandated in the new contracts as the assessment tool for the AMEP. See below for discussion of the Framework.

¹⁵ EAL/D = English as an Additional Language/Dialect

does not. CSWE Certificate IV students are left high and dry without a curriculum designed for their needs. Too many writing genres are lumped together to teach in the time allowed.

Similarly, in the ACT:

The constant focus on Employment is detracting from other very important settlement topics, such as Health, Education, Law etc. While Employment topics are important, they should only be a part of our teaching themes. If nothing else, they are boring for both teachers and students. How can teaching WHS [workplace health & safety] every term be interesting?

The “alignment” of the AMEP with the SEE Program has laid the ground for providers to combine students from both Programs in the same class,¹⁶ as several respondents have reported. The effect is described by one as follows:

We are told to focus on Employment, and the fact that they combine the AMEP and SEE students, so we have to try to focus on job-related topics.

Another reported combining Indigenous students with adult migrants:

We have had Aboriginal and Torres Strait Islander students from SEE funnelled into our AMEP classes. I do not believe this policy best serves the educational needs of our Aboriginal students.

One respondent described the undesirability of combining AMEP and SEE students:

SEE clients' needs are usually quite different from AMEP. The practice of placing SEE clients in AMEP classes or vice versa, should be reviewed, as it may have been resulting in student's needs not being met. A student who has a good command of social English does not need an AMEP curriculum. They should be in a class that focusses on Learning, Oral Communication for Education and Employment, Literacy and Numeracy. Perhaps the new CSWE curriculum will address some of these issues and therefore allow mixed SEE/AMEP classes.

Several commented on the extra assessment and compliance burden entailed in mixing these students in the one class:

This has been a difficult mix to manage. The aims of the two programs are different and so are the assessment requirements and conditions of assessment. Logistically it is a big challenge to find time to do assessments for SEE clients as they are mandated to be done. The needs of AMEP clients sometimes seem to have to take second place.

ACTA is gravely concerned that current DET policies aligning the AMEP with the SEE Program show *no* understanding and appreciation of the AMEP’s unique, vital and longstanding role as a program that is central to the settlement of newly arrived migrants and refugees in Australia.

These policies are seriously undermining the AMEP and have plunged it into crisis, as the remainder of this submission will indicate.

ACTA recommends as follows:

¹⁶ We also have three reports of international and local fee-paying students in AMEP/SEE classes and other combinations with students in State-funded labour market programs, e.g. Skills First, Smart & Skilled.

Recommendation 1: The AMEP should be located within policy-making and provision in the Education and Training portfolio. This location should be exploited to strengthen and further develop pathways from the AMEP into vocational training, higher education and employment. However, the Program’s distinctive role in integrating tuition in English as a second/additional language (which is not synonymous with teaching literacy) with broad settlement objectives, and its unique contribution to social cohesion in Australia, must be acknowledged, and therefore govern its Program goals, intended outcomes, management, Quality Assurance, curriculum, assessment and teaching methodologies.

Recommendation 2: The SEE Program should be reviewed with the aim of discovering who its clients actually are and how best their learning goals might be achieved. This review would entail:

- i. scrutiny of eligibility requirements and inconsistencies,
- ii. distinguishing between different client groups in regard to their starting points, and on that basis determining viable learning trajectories towards training, education and employment, and
- iii. rethinking and revising the Program to ensure coherent and feasible pathways, goals and desired outcomes for clearly identified target groups.

Basic demographics of ACTA survey respondents

The ACTA survey was directed to teachers, managers and volunteers who have worked/are working in the AMEP and SEE Program since 1st July 2017 when the current contracts began. At the time of writing, responses were predominantly from teachers but also included twenty-eight managers and eleven volunteers.¹⁷ Of the 315 people who answered this question, 99 (31%) worked in both the AMEP and SEE Program, 163 (52%) worked in the AMEP only, and 53 (17%) worked in the SEE Program only.

Respondents were from across Australia as shown in Table 1.

Table 1: Location of survey respondents

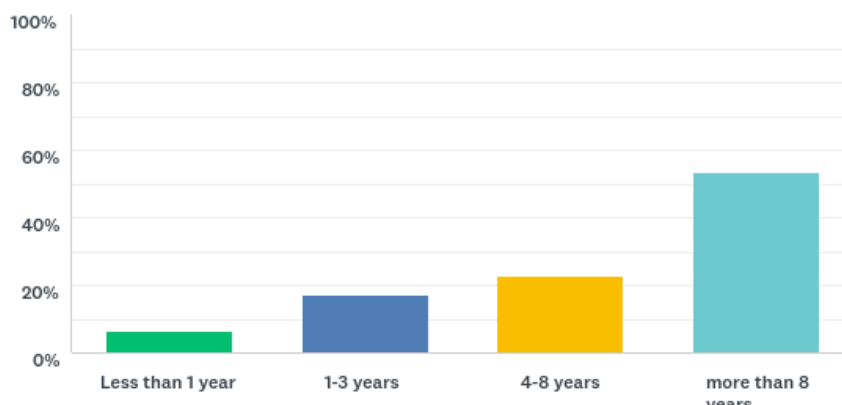
State/Territory	No.	%
ACT	33	7.84%
NSW	92	21.85%
NT	4	0.95%
Qld	78	18.53%
SA	72	17.10%
Tas	26	6.18%
Vic	80	19%
WA	36	8.55%
TOTAL	421	100

¹⁷ The survey was designed to allow questions to be skipped that did not relate to specific categories of respondent, for example, non-managers, those who taught in the AMEP but not the SEE Program (and vice versa), volunteers etc.

72 percent of respondents (n. 303) worked in capital cities, with the remainder in large or small regional towns. The respondents were overwhelmingly female (78 percent) and aged between forty and sixty-five (73 percent).

This workforce is generally highly experienced in and committed to these Programs, as can be seen from Chart 1.

Chart 1: Years of Experience in the AMEP and/or SEE Program



82 percent of respondents reported that they had also had TESOL experience in other settings, with over 50 percent having taught overseas.

Table 2 shows the number of respondents who reported working (since July 2017) for AMEP and SEE providers that are listed on DET official websites.¹⁸

Table 2: Respondents' Employers

Provider	No.	%
AMES Australia	17	4.94%
Career Employment Australia	0	0.0%
Centacare Employment & Training	5	1.39%
Learning for Employment	8	2.22%
MAX Solutions	19	5.28%
Melbourne AMEP	20	5.56%
Melbourne Polytechnic	24	6.67%
MTC Australia	8	2.22%
Navitas English Pty Ltd	39	10.83%
Nortec Training Solutions	2	0.56%
Progressive Training	0	0.0%
SMYL	2	0.56%
South Metropolitan Youth Link	4	1.11%
Status Employment Services	4	1.11%
STEPS	3	0.83%
Swinburne University of Technology	7	1.94%
TAFE (TAFE NSW; TAFE Queensland; TAFE SA; TasTAFE; WA TAFE)	236	65.56%
Other: ¹⁹	33	9.17%

¹⁸ <https://www.education.gov.au/adult-migrant-english-program-service-providers>; <https://www.education.gov.au/see-providers>

TOTAL	360	100
<i>Skipped</i> ²⁰	61	

An issue which is clearly evident from our survey, and has been canvassed in the media and the Parliament, is the inclusion, in addition to public providers, of private for-profit and not-for-profit providers in the award of contracts. A general breakdown of AMEP providers was given in answer to a question in Senate Estimates, and is shown in Table 3 below²¹.

Table 3: AMEP service public, not-for-profit and for-profit providers by jurisdiction

Jurisdiction	Public provider	Not for profit provider	For profit provider
NSW	1		1
Vic	1	2	
Qld	1		
SA	1		
WA	3	1	
Tas	1		
NT		1	
TOTAL	8	4	1

These data do not include sub-contracted providers. We also have no similar breakdown for SEE Program providers, where the number and range of for-profit and not-for-profit providers is greater.

As can be seen in Table 2, the majority of our respondents (62%) worked for TAFE providers. Aside from TAFE, we have yet to comprehensively identify which among the providers listed above are for-profit and not-for-profit. We are aware that AMES Australia, Melbourne Polytechnic and Swinburne are not-for-profit and that the main for-profit providers are Navitas and MAX Solutions. More detailed analysis of ACTA survey data, which we will undertake after the survey closes, will allow us to categorise survey responses according to these different employers.

In the meantime, however, we can report some individual comments by respondents. In the Appendices that relate to the issues we consider in the remainder of this submission, our respondents refer to:

- MAX Solutions and Navitas in regard to **sub-standard physical facilities** (Appendix 2, Comments 8, 9, 20 & 53; Appendix 10, Comment 43)
- private RTOs in general in regard to **unpaid hours** (Appendix 8, Comment 35)
- MAX Solutions, Melbourne Polytechnic, Navitas (in comparison to NSW TAFE), and unnamed TAFE employment in regard to **morale** (Appendix 9, Comments 9, 19, 31; Appendix 10, Comment 52; Appendix 10, Comment 103)
- TasTAFE and TAFE Qld in regard to **workload** (Appendix 9, Comment 42; Appendix 10, Comment 103)

¹⁹ The providers in Table 2 are those listed on the DET website: <https://www.education.gov.au/adult-migrant-english-program-service-providers> <https://www.education.gov.au/see-providers> “Other” responses refer to specific Centres operated by the providers listed in Table, while some refer to organisations sub-contracted to the named contract holder. Sub-contracting is a major concern for ACTA.

²⁰ Survey Monkey records the number of questions that respondents do not answer as “skipped”. The reasons vary. Most commonly, the respondent may have discontinued doing the survey; on the basis of a given answer (e.g. that the respondent is not a manager) the survey may have skipped the respondent across questions that do not apply to him/her; the survey designer may have made some questions optional.

²¹ Question SQ18-000923 by Senator Mehreen Faruqi 25th October 2018, 2018-19 Supplementary budget estimates Education and Employment Committee, Education and Training Portfolio

- a for-profit provider **using volunteers to cut costs** (Appendix 10, Comment 43);
- for-profit providers **undermining quality provision** (Appendix 10, Comments 86, 90, 95, 102)
- TAFE Qld's adoption of an **inappropriate curriculum** for adult migrants (Appendix 10, Comment 101).

Examination of other individual comments makes clear that further analysis is needed before any conclusions can be drawn that might distinguish provision according public, not-for-profit and for-profit providers. At the moment, it seems clear that failures exist among all types of providers.

Issue 1: ASQA requirement re the VET Certificate IV in Training & Assessment²²

A requirement of AMEP and SEE Program contracts appears to be that all teachers hold the *Certificate IV in Training and Assessment* TAE40116. Our understanding is that this requirement stems from the Australian Skills Quality Authority (ASQA) and applies across the whole VET system. However, managers in our survey report that they are not required to hold this Certificate.

374 of our respondents reported that they met this requirement, while 42 did not (n =416). Our survey did not request any comment on the Certificate but 52 respondents offered assessments, only one of which was positive. Typical descriptions are: “a terrible course ... SUCH a useless timewaster”; “it’s about compliance and how to fill in forms”; “a stressful, demoralising experience ... a nightmare”. These evaluations are provided in full in Appendix 1 to this submission.

A reason our respondents frequently gave for their criticisms is that the Certificate is not only superfluous to their other teaching qualifications but both markedly inferior and irrelevant. The teaching qualifications of our respondents are shown in Table 4.

Table 4: Teaching Qualifications of Respondents

Qualification	No.	%
M Ed or higher	134	32.21%
B Ed (4 yrs)	48	11.54%
B Ed (p/g 1 yr)	40	9.62%
Dip Ed	47	11.30%
Dip Teach	15	3.61%
TAFE Cert IV TAE	7	1.68%
No teaching qual.	10	2.40% ²³
Other: ²⁴	115	27.64%
TOTAL	416	100
<i>Skipped</i>	5	

A further concern raised by our respondents is the cost involved. An online search reveals a range of fees, almost all over \$1000. Given these high fees, ACTA has profound misgivings as to whose

²² The issue of rigid teacher qualifications is just one facet of the huge problem attaching to the recognition of migrants' overseas qualifications. See an important recent report from UNESCO Global Education Monitoring Report “What a waste: Ensure migrants and refugees' qualifications and prior learning are recognized”: <https://gemreportunesco.wordpress.com/2018/12/18/what-a-waste-ensure-migrants-and-refugees-qualifications-and-prior-learning-are-recognized/>

²³ These respondents were volunteers.

²⁴ Comments indicated that the qualifications listed in the survey question were not sufficiently detailed. These respondents fitted into the levels of qualification listed in Table 4.

interests are served by these requirements, especially when this cost is not one-off but is repeated when the Certificate is revised and teachers are required to update their certification (see, for example, Appendix 1, Comments 5, 6, 28, 37, 51 & 52). We understand that some providers cover these costs but it seems others do not. One respondent reported having to use her recreation leave to undertake the course.

The following comments encapsulate key criticisms of this requirement:

(i) *Previous AMEP tender stipulations for qualifications required by teachers appeared reasonable. While I understand the necessity of the TAE Cert IV for those in a training environment who have no teacher qualifications or experience, it seems an unnecessary imposition for those appropriately qualified and experienced to teach English as an Additional Language. I found getting TAE Cert IV to be a very considerable waste of time, money and effort, with little flow onto what I do as a teacher in AMEP. I would have preferred to expend that time, money and effort for the benefit of the students in our programs. The TAE Cert IV takes little account of the qualifications and experience I already have, and the requirement to keep updating it, to fit in with ASQA dictates, is galling.* (Appendix 1, Comment 39)

(ii) *I feel upgrading this certificate has taken valuable time and energy I could have done more relevant PD related to my teaching.* (Appendix 1, Comment 40)

This requirement is also impacting on delivery of the AMEP and SEE Program, which uses volunteers as assistants to classroom teachers. 184 survey respondents reported they were supported in this way.²⁵ However, one respondent reported that “*we are told we cannot use them [volunteers] any more as they are required to have a Cert 4 in TAE.*”

Despite most comments stating that gaining this Certificate is mandatory irrespective of other teaching qualifications, it appears that some exemptions are possible:

I have recently obtained advice from ASQA that because I have a higher' level qual specifically in adult education (i.e. higher than AQF level 4), I actually am NOT required to have and to keep upgrading my Cert 4 TAE (but no-one ever tells you that!). (Appendix 1, Comment 45)

It would appear that ASQA rulings – or at least interpretations of them passed on to teachers – are inconsistent and unclear. This is elaborated in one comment:

ASQA RTO standards state that possessing a higher level adult teaching degree is sufficient where one doesn't possess the TAE40110/116. However there is ambiguity around what degrees are considered a higher level adult teaching degree. I possess a Masters of TESOL and other teaching degrees. While I can understand non adult teaching degrees, such as those specializing in primary/secondary teaching, not being sufficient, the fact that ASQA isn't able to provide a straight answer about what degrees constitute higher level adult teaching degrees is frustrating. I can state without hesitation that I learned little to nothing new when completing/updating the TAE qualifications. Furthermore I can state it was ridiculous and belittling to be asked to complete the now compulsory LLN component of the TAE, for the update to TAE40116, despite possessing a Masters' degree in precisely that area and having several years of industry experience in the LLN and foundation studies field. (Appendix 1, Comment 2)

From our survey data, ACTA concludes that the Certificate IV in Training & Assessment is a prime example of an inflexible qualification requirement (Reference 2), almost certainly applied inconsistently. It is a counter-productive facet of the current regulatory framework (Reference 1) for AMEP and SEE Program providers in that it contributes little of relevance to teaching in the AMEP and SEE, and is inferior to the qualifications required by professional TESOL teachers to English

²⁵ This issue is itself a regulatory concern. See below “Working Conditions”.

language learners.²⁶ It diverts time and resources from more productive professional development, and undermines morale. We understand that our respondents' views of the relevance and quality of this Certificate extend well beyond the AMEP and SEE Program.

ACTA's recommendations are therefore as follows.

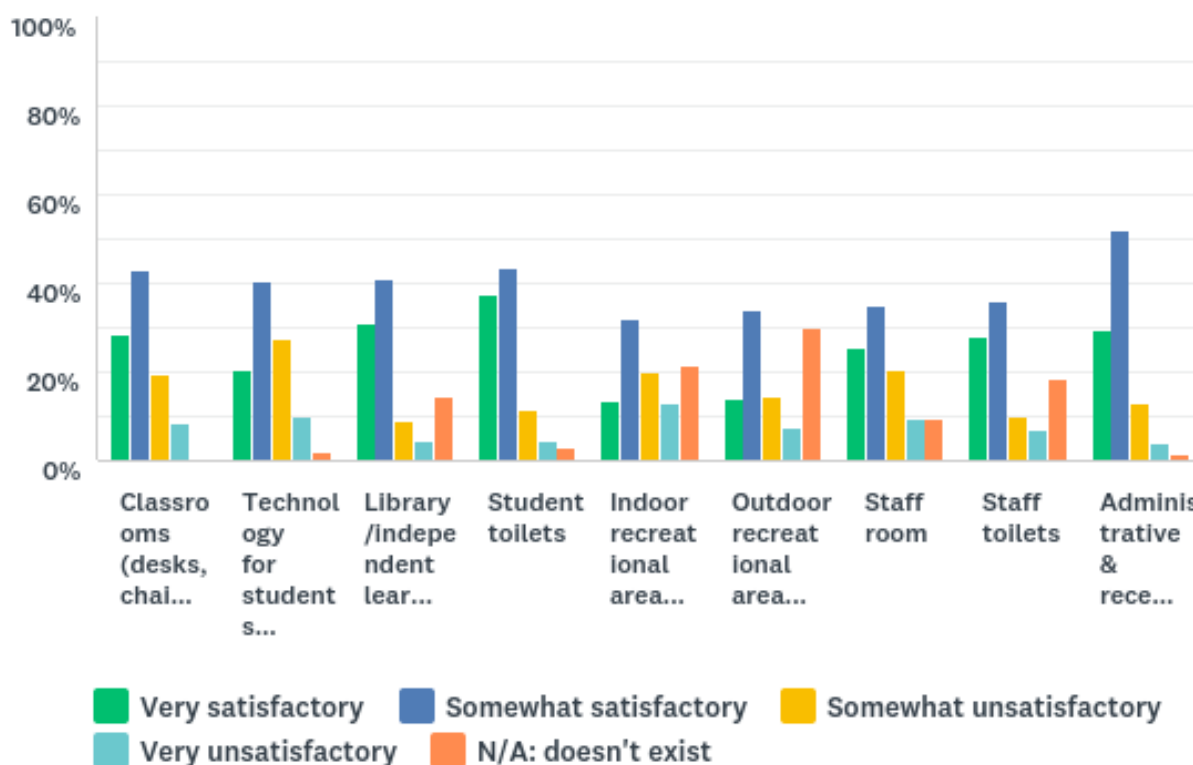
Recommendation 3: The Expert Review should investigate and evaluate the contribution of the Certificate IV in Training and Assessment to Quality Assurance in the VET sector.

Recommendation 4: The TAFE Certificate in Training & Assessment should not be required for those who hold higher or equivalent TESOL teaching qualifications.

Issue 2: Standards of provision – facilities and infrastructure

Preliminary examination of our data suggests there is cause for concern regarding facilities in some AMEP and SEE Program venues. Responses to the question (Q 31) *“How satisfactory are the following facilities in your Centre?”* are shown in Chart 2 and Table 5.

Chart 2: Evaluations of Facilities in AMEP & SEE Centres



²⁶ For TESOL teacher qualifications recommended to DET, see response to Question on notice no. 296, Portfolio question number: SQ18-001000, Senator Doug Cameron 25 October: [https://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/ee\(A0296_EducationandEmployment_2018-19Supplementarybudgetestimates_EducationandTraining\)](https://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/ee(A0296_EducationandEmployment_2018-19Supplementarybudgetestimates_EducationandTraining))

Table 5: Evaluations of Facilities in AMEP & SEE Program Centres

Type of facility	Satisfactory		Unsatisfactory		N/A: doesn't exist	Total
	Very	Somewhat	Somewhat	Very		
Classrooms (desks, chairs, ventilation, heating etc)	91	150	64	28	2	335
Technology for students (computers, smartboard etc)	66	137	91	34	7	335
Library/independent learning centre	103	138	30	14	50	335
Student toilets	124	147	39	15	9	334
Indoor recreational areas for students	43	111	68	41	72	335
Outdoor recreational areas for students	47	114	48	25	100	334
Staff room	86	119	66	30	34	335
Staff toilets	94	120	33	23	65	335
Administrative & reception areas	98	173	45	13	6	335
Total						335
<i>Skipped</i>						87

As can be seen from Chart 2 and Table 5, the majority of respondents reported that most facilities were either “very satisfactory” or “somewhat satisfactory”. However, comments include descriptions of clearly unacceptable and even hazardous conditions. All evaluative comments (favourable and unfavourable) are presented in Appendix 2.

One might expect the norm for modern teaching venues would entail libraries, adequate computers, interactive/electronic whiteboards, internet access, student recreation spaces etc., all of which are reported lacking in some venues. Our respondents also report dirty toilets, poor ventilation, leaking roofs, fire hazards, inadequately cleaned classrooms, crowded or non-existent staffrooms, and inadequate or non-existent air-conditioning and heating. For example:

(i) *At Navitas the chairs were the cheapest and not good for students (hard plastic with no padding and not terribly ergonomic). There were laptops but the wifi was extremely unreliable. I set up my own class libraries for each level and paid for everything out of my own pocket. There weren't enough student toilets for the number of them. There was one disabled toilet that had a 'Staff toilet' sign put on it. The staffroom was way too small for the number of teachers using it but it seems their new venue will be even worse. (Appendix 2, Comment 8)*

(ii) *Ventilation is very poor. I have reported and complained many times which falls on deaf ears. The room has no natural or built in ventilation and so smells very mouldy - a work place health and safety issue I'm sure. It is a room built within a room, done on the cheap without proper planning. I asked for a window - they gave me a small frosted one that doesn't open, so no natural light and no fresh air. (Appendix 2, Comment 49)*

(iii) *Many of our classrooms are very nice and the teacher areas are new and comfortable. But some of our classrooms are windowless boxes with no technology at all. We were promised that these rooms would be upgraded within a year of our arrival, but nothing at all has been done. Compounding this is that we have been told that we are not allowed to put anything on the walls (no maps, posters, student work - nothing). It is very depressing for the students, and some traumatised students find it very difficult to be in these rooms. (Appendix 2, Comment 3)*

It is difficult to understand how these clear failures could have escaped any adequate regulatory framework.

We find it equally difficult to understand how contracts can be awarded to providers without verification that adequate facilities and other infrastructure are in place. A detailed example follows:

Max Solutions took over the contract in Launceston in July 2017 and was wholly unprepared. The time I spent there was largely 'putting out fires' - bringing compliance documents up to standard, ensuring buildings and classrooms were fit for purpose, ensuring that teachers had documented that they had the relevant qualifications etc. There was no staff room so teachers were bombarded with student enquiries and administrative tasks during break times (no student counsellor to handle students who were agitated at the lack of facilities). No dedicated workspace or bank of computers for teachers to use. There was one office with two computer terminals that were constantly in use by others. Teachers were allowed to use Google Chromebooks but these did not have a printing function, so the most efficient way for me to do class prep was to save lesson plans, handouts etc to Google Drive and then print them from home, then bring them back the next day to photocopy. We were expected to do AMEP assessments of up to two hours, several times a week on top of a 25 hour per week teaching load and staff meetings, leaving virtually no time for lesson planning and preparation on-site. I was constantly stressed, management were panicky about not being compliant, and it was overall quite a toxic environment. Colleagues and collegiate support were great, but that's because we were all suffering together.

Eventually Max Solutions had some things in place, but on the first day there were no toilets/kitchen available for students to use and they were told to go across a busy road and use the public library across the street. There was nothing in the way of recreational facilities for students but by about Week 6 they had an open area upstairs for students to use during break time. Staff facilities were shared with general Max Employment staff and I think some staff were a bit put out at having their space invaded. Classrooms had to be built during the first few weeks which meant many students had to suspend their studies while construction was going on. The classroom I taught in was pretty cramped for the 20-25 youth students I had. There were banks of Chromebooks available for use in class but I had to negotiate with other class teachers to use them but there was no booking system so it was essentially first in best dressed. No smart boards, had to haul in a projector and set it up in a cramped classroom. Admin was essentially a single desk in the foyer. As per my previous comment, no staff room and no place to get away from students, and admin staff would try and 'catch' me during lunch break to answer questions. I would literally dash out the door during my lunch break so that I could just be alone and in a quiet place for 30 minutes. (Appendix 2, Comment 9).

This example adds to ACTA's accumulating evidence that the competitive contracting process for these Programs is hugely disruptive for students and staff. Simultaneous with this disruption is the waste that follows when other providers who have been unsuccessful in gaining contracts discard resources. We know, for example, of one provider consigning all their resources to a skip and another giving computers to students. ACTA has documented this disruption and waste in many previous submissions.²⁷

As with other matters, the sub-standard facilities clearly described by our respondents frequently go unreported to relevant authorities because individuals fear jeopardising their employment and/or their employers' chances of gaining future contracts.

ACTA makes the following recommendations.

²⁷ Most recently: ACTA Submission to the Inquiry into Migrant Settlement Outcomes, May 2017 <http://www.tesol.org.au/Advocacy/ADULT-EAL-NEWS-AND-ISSUES> section 3.3.5, p. 90.

Recommendation 5: The Review should include clear recommendations on how the VET regulatory framework should ensure that providers' physical facilities are regularly and effectively monitored to ensure maintenance of basic standards.

Recommendation 6: A clear, transparent and confidential procedure should be instituted and widely publicised, by which those affected by clearly sub-standard Centre facilities can report on these facilities.

Recommendation 7: AMEP and SEE contracts should only be awarded following inspection and verification that adequate facilities exist to support a teaching program.

Issue 3: Assessments of student progress as the basis of a Key Performance Indicator

A Key Performance Indicator (KPI) for the AMEP and SEE Program rests on reports of students' progress in English language learning for every 200 hours they are enrolled. Providers' performance and student entitlements to on-going tuition both rest critically on this KPI.

Basing a KPI on assessments of student progress is highly problematic for several reasons.

(1) Unsuitability of using student progress as the basis for a KPI

To presuppose a relationship between student progress and provider effectiveness and/or a student's commitment to learning English is highly problematic if fairness, accuracy and justice are considerations.

This KPI is unfair because the numerous variables in play make it impossible to fairly and accurately pre-determine what might constitute a benchmark for a satisfactory/expected rate of progress.

The most significant determinant of progress in learning English has been conclusively demonstrated to be previous education and existing literacy, irrespective of the individual's commitment to learning.²⁸

Added determinants of progress include the effects of previous traumatic experiences, family responsibilities and the numerous concerns that relate to establishing oneself in a new country.

Our survey included a question on why students withdraw from Programs before they have exhausted their entitlements. The answers apply equally to rates of student progress. Table 6 shows that the most common reason for student withdrawals is reported as "personal pressures (own or family member illness/other responsibilities)".

²⁸ For an extensive summary of the time it takes different learner groups to reach age appropriate norms and the factors involved, together with references to relevant research, see ACTA Submission to the Inquiry into Migrant Settlement Outcomes, May 2017 <http://www.tesol.org.au/Advocacy/ADULT-EAL-NEWS-AND-ISSUES>, Table 1, p. 35 ff.

Table 6: Reasons for Students Discontinuing Classes

Reasons	Very common	Somewhat common	Somewhat rare	Very rare	Irrelevant	Total
Gaining employment	39	109	48	28	16	240
Personal pressures (own or family member illness/stress/other responsibilities)	126	116	29	11	19	301
Feeling/becoming unmotivated to learn English	4	53	79	116	52	304
Feeling that course content did not meet learning needs	5	36	86	125	54	306
Discouraged by assessment requirements	16	41	85	107	56	305
Dissatisfaction with teaching style/approach	1	19	70	148	68	306
Classmates not at student's English level	5	41	95	107	58	306
Classes too difficult	4	35	92	122	53	306
Classes too easy	1	24	96	124	58	303
Difficulty in adjusting to classroom learning	5	41	92	114	53	305
Personal/gender/cultural/age issue(s) with other classmates	2	24	76	135	69	306
Total						306
<i>Skipped</i>						116

As can be seen from Table 6, the most common reason reported for students withdrawing from classes is pressures on the individual and family issues. (The next most common reason is gaining employment.) As described by one respondent:

Most of the time students drop out because they have personal issues / or cannot fit in the time along with settlement issues. I think we should be offering classes that start at 10 and finish at 2 to help students with settlement, appointments, kids going to school and those with mental health issues, where the later starts and shorter days would really help.

One respondent wrote:

I am the PTA [= Pre Training Assessment] assessor. I am having clients re-referred who have previously been withdrawn for medical issues. Often these issues are not fully resolved and it is a good bet the student will be withdrawn in the future. Referrals are coming in for 5 days attendance despite pre-existing medical conditions that would make it difficult to sit or concentrate in a classroom for this period of time. In the last 6 months there has been increased inflexibility in relation to student needs from referral agencies. I am concerned how these recurring rounds of referral and withdrawals impacts on English learning as theoretically only a certain amounts of tries at SEE are possible.

Another said:

One particular cohort contains business visa clients, so there are times when commitments overlap and they cannot continue with a class due to travel or other business commitments.

These data provide indirect evidence that assessments of student progress over specified time periods do not reliably indicate commitment to learn English.

In any case, it is arguable that those whose progress falls below whatever might be determined as “normal” are precisely the learners who are most in need of English language tuition tailored to meet their needs.

ACTA believes that student commitment to learning should certainly be a key criterion in determining tuition entitlements and thus a responsible deployment of taxpayer dollars. This determination is best done against carefully and sensitively designed attendance requirements, as we have outlined in other submissions.²⁹

ACTA is strongly opposed to use of *any* KPI that is based on assessments of student progress as part of the regulatory and Quality Assurance in the VET system in general and the AMEP and SEE Program in particular. Such a KPI cannot accurately reflect a student’s commitment to learning or a provider’s commitment to quality tuition, and is therefore is intrinsically invalid and unfair. Our recommendation is therefore as follows:

Recommendation 8: Assessments of learner progress in the AMEP and SEE Program should not be used as the basis of any KPI.

(2) Unsuitability of the currently deployed assessment tool

ACTA’s opposition to regulating these Programs through a KPI based on assessing student progress applies irrespective of the credibility of the kind of assessment used. However, in the AMEP and SEE Program, the problems just described are compounded by use of the **Australian Core Skills Framework** (ACSF) as an assessment tool.

The ACSF (and its predecessor) has been used as an assessment tool in the SEE Program for several contracts. It was mandated for the AMEP at the beginning of the current contracts on 1st July 2017, replacing the **International Second Language Proficiency Rating Scale (ISLPR)** for determining starting points and placements, and the **Certificates in Spoken & Written English (CSWE)**, a purpose-designed curriculum for the AMEP, integral to which is an assessment system that previously generated the data on which the progress KPI was based.

The ISLPR has been in place since the 1960s, and the CSWE since the 1990s. The work that has gone into their on-going development and refinement has served the AMEP (and to some extent the SEE Program) well. Both the ISLPR and CSWE have their problems. However, these problems are amenable to much less drastic solutions than replacing them with the ACSF as an assessment tool, irrespective of its role underpinning a KPI.

The ACSF should not be used as an assessment tool for at least the following reasons:

1. **The ACSF is not an assessment tool, does not claim to be one and cannot be used this way.**³⁰ The various methods of assessing student progress based on the ACSF that teachers

²⁹ http://www.tesol.org.au/files/files/496_AMEP_SEE_Program_Evaluation_2014_-_ACTA_Response.pdf, p. 17 ff.

³⁰ The relevant section in the ACSF Introduction states:

Following mapping of course requirements and materials, and identification of learner strengths and weaknesses, the ACSF can be used to:

- *tailor curriculum, materials and methodologies to learner needs*
- *design and rate core skills assessment instruments*”

and others³¹ are devising cannot meet the standard requirements of validity and reliability that is required for an assessment tool.

2. Our survey data provides credible evidence that:

- the ACSF falls well below **the level of user acceptance necessary to support a robust KPI** within the VET Quality Assurance and regulatory framework, and is regarded by a significant number of assessors **as inferior to the ISLPR** in assessing eligibility and starting points (Appendices 3 & 4)
- **professional development** in the ACSF has not achieved this acceptance (Appendix 5)
- use of the ACSF as an assessment tool is **adversely affecting teaching in both the AMEP and SEE Program** because of the time it takes to administer and especially to write up, its complexity, the diversion of students' and teachers' attention away from curriculum, and its effect on student and teacher morale (Appendix 6)
- **the justification given for mandating the ACSF** – viz. that it facilitates pathways into the wider VET system and employment – is unproven and almost certainly false (Appendix 7)
- teachers are **subverting its function** as an assessment tool (see Appendix 3, Comment 2; Appendix 7, Comments 27 & 43; Appendix 10, Comments 29 & 64).³²

Our recommendations are therefore:

Recommendation 9: The ACSF should be discontinued within the AMEP, pending an independent expert review of its validity and reliability as an assessment tool and, further, as a framework for assessing learning English as a second/additional language. This review should be tasked with developing recommendations on how progress in *learning English as a second/additional language* (as distinct from literacy or job-readiness) should be assessed within the AMEP and SEE Program in ways that are both credible and positive for students, their English teachers, other educational institutions (VET and higher education) and employers.

Recommendation 10: The Review should inquire into the extent to which the ACSF has currency within the wider VET system and if so, the function it serves, including as an assessment tool and/or as recognised certification for entry to other programs and/or employment. If these functions cannot be ascertained, a prima facie case exists for immediately discontinuing the ACSF as an assessment tool, at least in the AMEP.¹

Issue 4: Working conditions - unpaid overtime and use of volunteers

Although working conditions *per se* are not included in the Review's terms of reference, ACTA hopes that gross breaches fall within consideration of VET regulatory settings. Our survey includes accounts of such breaches in regard to unpaid overtime, which have clear flow-on effects on teachers' ability to deliver quality tuition. We therefore hope that the Review's recommendations on regulatory settings will include attention to ensuring providers are monitored to ensure that these breaches do not occur.

-
- *evaluate the potential usefulness of assessment tasks by identifying the ACSF levels and Performance Features being assessed*
 - *develop self evaluation tools which increase learner engagement and ownership*
 - *assist teachers/trainers to provide specific feedback on performance.*

³¹ Notably, the Quality Assurance Provider, Linda Wyse & Associates (LWA).

³² See also http://www.tesol.org.au/files/files/591_Problems_in_the_AMEP_SEE_Program_25_May_2018_-_an_ACTA_Background_Paper. sub-section "Gaming the system", p. 20 ff.

If AMEP and SEE Program teachers were generously remunerated, a small number of unpaid overtime hours might be tolerated. However, according to our respondents, their pay rates are generally meagre and mostly not commensurate with the high level of qualifications and extensive experience noted earlier in this submission. As can be seen in Table 7, 71% receive somewhere between \$69 and \$30 an hour.

Table 7: Hourly Rates of Remuneration (includes all employment levels & designations)

Hourly Rate	No. Respondents	%
\$90 per hr (= \$3,420 per wk) or more	13	3.82%
\$70-89 per hr (= \$2,660-3,382 per wk)	65	19.12%
\$50-69 per hr (= \$1,900-2,622 per wk)	99	29.12%
\$30-49 per hr (= \$1,140-1,862 per wk)	136	40.0%
\$19-29 per hr (= \$722-1,102 per wk) ³³	19	5.59%
Less than \$19 (= \$722 per wk)	8 ³⁴	2.35%
TOTAL	321	100
<i>Skipped</i>	80	

In this context, it is concerning that 90 percent of respondents reported working unpaid hours, as shown in Table 8.

Table 8: Unpaid Hours Worked Per Week (averaged over past 10 weeks)

Unpaid Hours Worked per week (averaged over past 10 weeks)	No. Respondents	% Respondents
0	33	9.71%
1-4	74	21.76%
5-8	85	25.00%
9-16	96	28.24%
17-24	21	6.18%
more than 24	31	9.12%
TOTAL	340	100
<i>Skipped</i>	82	

Our respondents' comments on their levels of remuneration and unpaid overtime are presented in Appendix 8. A respondent who reported working an average of 9-16 unpaid hours per week in the past 10 weeks described the range of duties performed in these hours:

It is difficult to actually give even an average amount of time as ... [phrase deleted to protect identity], I have not only lecturer and enrolments and all admin responsibilities but also I'm the person that students come to for help as there is no external assistance to help them navigate their new surroundings. I often get texts and emails asking for assistance or guidance. I also feel that the initial interviews take longer than the 3 hours payment allocated for each student. (Appendix 8, Comment 5)

³³ The current national minimum wage is \$18.93 per hour or \$719.20 per 38 hour week before tax with a 25% casual loading. The lowest hourly rate for teachers is \$25.23. <https://www.fairwork.gov.au/ArticleDocuments/872/educational-services-teachers-award-ma000077-pay-guide.pdf.aspx>

³⁴ These were volunteers.

The complexity and length of reporting based on the ACSF has already been noted. The following is a description of how compliance requirements have become excessive in the context of the normal expectations placed on teachers:

I refuse to take excessive amounts of work home, but unfortunately that has meant that under the new contract that it is impossible to meet all of the work requirements of teachers. The excessive amount of report writing that goes with assessments is just not doable, especially in a multilevel, multi funded classroom where students are not doing the same assessments. We have rolling intakes, and such a variety of learners that all non-teaching time is consumed with preparation for class as we are preparing lesson plans x3 or 4 for each class x3 sessions per day. We cannot follow any one book and the ridiculous decision to put SEE and AMEP together using the same assessments has been a nightmare. All SEE materials were written for native speakers and often assume cultural information. The idea that we can contextualise for each student is academic arrogance - no teacher on the front line has time to contextualise for each, nor should it be necessary. As a teaching group we were conned into teaching longer hours on the agreement that we would have more admin support. The only problem was that under the new contract our teaching and assessment duties actually increase exponentially and because of our agreement we then had less time to do more work. The contract was costed to win not to deliver and the cost to front line teachers has been disgraceful. All the talk about work life balance and wellness etc is just hot air, my colleagues have been dropping like flies. In my 8 years at TAFE working under the last 3 contracts this has been the worst I have ever experienced. I only wish I could do something else in this regional area, I would leave in a heartbeat. (Appendix 8, Comment 36)

Along similar lines, one respondent wrote:

To do all the paperwork + create assessments from scratch + hours of validation + marking + lesson prep I cannot fit all these things in the hours I am given on top of my teaching hours. I have a logbook (advised by my accountant), so I could claim my computer and Internet use on tax. Last week I worked over 12 hrs (I mean from home). The weeks before - around 15-17 hours. (Appendix 8, Comment 40)

In some institutions, “time off in lieu” (TOIL) is offered in compensation for unpaid overtime. Our understanding is that this form of compensation is largely a fiction in the sense that, if taken, it requires even more unpaid overtime when the person returns to work. In response to another question, one respondent described the loss of both holiday leave and time in lieu, and its stressful impact:

I am routinely required to work overtime with no pay. It is a commonly known expectation that everyone in the team do overtime at no pay. I have recently been offered contract terms that would require 5 hours overtime for 7 hours paid work... I have refused to sign this contract, and negotiations are underway, but the impression I am getting is 'too bad, this is what is being offered' and the burden is on me to argue the case of why it is unfair... which I am of course having to do in my own time. Further, under the SEE contract, we do not have opportunities to use all of our NAT/holiday leave, as we have to teach during what used to be our AMEP holiday periods. We are kept on a skeleton staff, with no room for relief for holidays. When we do want to take holidays, we have to arrange our own cover from other teachers in the team; management do not do this for us. This often involves temporarily combining classes, or teachers racking up TOIL days that they then don't get opportunity to take. The stress of adversely affecting students or our co-workers means that there is a culture of guilt around taking leave, to which we are entitled! It leaves us feeling exhausted, demoralised and stressed. As the only PTA assessor at my site (because no other teachers have any capacity to take on PTAs) I also have to work year round, with no opportunity for holidays except the 3 weeks at Christmas, because we have to be available for interviews throughout the year... I desperately want to stop doing this role, because of the enormous burden and stress it places on me, but no one will take it over from me.

Answering a Question in Senate Estimates³⁵, DET stated that they did not keep data on the employment conditions in the AMEP.³⁶ We assume the same answer would apply to the SEE Program. These answers reflect the central rationale for the current system of competitive contracting for these Programs: it drives down wages and conditions, while absolving the funding body from responsibility for them.³⁷ The employment insecurity inherent in this situation likewise inhibits employees from bringing violations to the attention of bodies such as the Fair Work Commission. Given the excessive compliance requirements in every other aspect of DET's management of these Programs, ACTA finds this situation invidious. Our recommendation is as follows.

Recommendation 11: The Review's recommendations on improvements to the VET regulatory framework should address ways in which vulnerable low-paid employees can be protected from exploitation and can gain redress without penalising their employment. This framework should include effective monitoring to ensure all employees have clear information about how to seek redress.

We have already referred to the use of volunteers in these Programs. From 1973, the AMEP included the highly regarded Home Tutor Scheme, which assisted migrants (mostly women) in the home when they could not access formal classes.³⁸ The Home Tutor Scheme has become the Volunteer Tutor Scheme offered by individual providers.³⁹ Volunteers are also used on-site and are greatly valued by teachers, for example:

Without volunteer, assistance many of my mixed level/age/nationality classes could not have functioned properly or effectively at all.

Similarly:

We have some excellent volunteers who support the transition of migrants to our community as well as facilitating the students' learning in small groups with suitable resources. They also serve as a welcoming committee! They are particularly useful and effective with low level classes.

However, our data includes disturbing reports that volunteers are being used on their own to teach full classes of 15 students or more (14 respondents), assess student progress (15 respondents), and undertake counselling and case management (2 respondents). Respondents commented that compliance requirements, especially reporting against the ACSF, were the main reason for using volunteers in these ways, for example:

³⁵ Portfolio question number: SQ18-000927, 2018-19 Supplementary budget estimates, Education and Employment Committee, Education and Training Portfolio, Hon. Senator Mehreen Faruqi 25 October 2018.

³⁶ The answer was as follows:

The Adult Migrant English Program (AMEP) is an Australian Government-funded program administered by the Department of Education and Training through contractual arrangements with service providers. AMEP teachers are employed and managed by service providers. The department does not collect data on teacher's wages or employment conditions. AMEP service providers are required to comply with Commonwealth policies on the engagement of workers, including the Fair Work Act 2009, and the same standards and obligations that are imposed on Commonwealth Personnel under the relevant state and Commonwealth Work Health Safety Act.

³⁷ We note recent advice to DET that "The much more competitive pricing for AMEP ... has driven down the price service providers charge the Commonwealth for client tuition hours" and that "AMEP providers have identified that they cannot attract teachers with post-graduate TESOL qualifications." AMEP Curricula and Teacher and Assessor Qualifications Guide, p. 63, located in answer to Question on notice no. 296, Portfolio question number: SQ18-001000, 2018-19 Supplementary budget estimates, Education and Employment Committee, Education and Training Portfolio, Senator the Hon. Doug Cameron, 25 October 2018.

³⁸ http://www.ameprc.mq.edu.au/docs/research_reports/new_life_new_language/AMEP_book_New_life_i-70.pdf p.

³⁹ <https://www.thsmithfamily.com.au/programs/community/home-tutor-scheme> p. 15. <http://www.navitas-english.com.au/careers-and-volunteering/volunteer/>

Negotiating SEE/AMEP assessments - especially since new requirements with AMEP/SEE PA's etc etc and changing to an EAL curriculum - assessments seem to dominate our teaching time. Our wonderful tutors on occasion step in to assist with these assessments - especially with the lower level classes as we simply do not have time to teach and try to assist individuals with the mountains of tasks.

Another explained:

The volunteer tutor taught the whole class while the teacher was assessing 1:1 oral tasks over several days.

Another wrote:

Without volunteers it would have been very difficult to manage during these past two years.

It would seem that heavy-handed compliance requirements are impacting on legitimate uses of volunteers, as for example:

We are no longer allowed to use volunteers in the classroom. Massive logistical barriers have been put in place to prevent them from working in the AMEP. This is a great loss for migrant education.

ACTA's recommendation is as follows:

Recommendation 12: The Review's recommendations on improvements to the VET regulatory framework should address ways of ensuring that, on the one hand, volunteers are not used to replace teachers but, on the other, are appropriately encouraged, deployed and supported.

Issue 5: Working conditions - morale

Given the issues we have covered so far in this submission, there should be no surprise that our survey provides evidence of profoundly low morale among our respondents.

Table 9 below is indicative. In response to the question: "*Since 1st July 2017 [the start of the current contracts], has your feeling of well-being at work changed?*", 71 percent of respondents reported a decline in their morale.

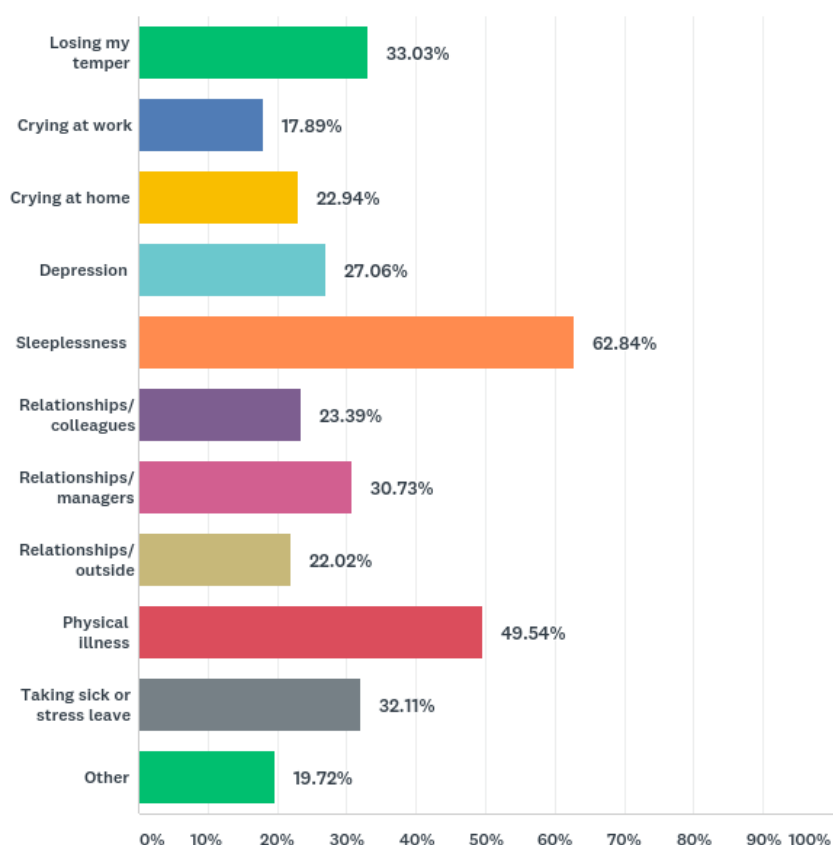
Table 9: Morale Since 1st July 2017

Morale	No.	%
Significantly improved	15	5.21%
Slightly improved	18	6.25%
Stayed about the same	50	17.36%
Slightly declined	84	29.17%
Significantly declined	121	42.01%
Total	288	100
<i>Skipped</i>	134	

This decline was described as manifesting itself in the ways shown in Chart 3:⁴⁰

⁴⁰ Total responses: 281; skipped 203. The full version in the survey question of "Relationships/colleagues/managers/outside" was "Difficulties in my relationships with colleagues/managers/beyond the workplace".

Chart 3: Manifestations of Decline in Morale



Comments accompanying these answers are documented in Appendix 9.

Table 10 shows responses to a question about resigning from these Programs. Approximately 37 percent of respondents were considering leaving or had already left: 5 percent reported that they had resigned, 10 percent were actively seeking other employment, and 23 percent or were seriously considering quitting.

Table 10: Actual & Contemplated Resignations

Have you considered leaving your employment in the AMEP/SEE Program since 1st July 2017?	No.	%
Yes, I have already left the AMEP/SEE Program since 1st July 2017	14	4.88%
Yes, I am actively looking for another job	30	10.42%
Yes, I am seriously considering looking for another job or even quitting work altogether	65	22.57%
I'm not sure at the moment	80	27.78%
No, I haven't considered looking for another job	99	34.38%
Total	288	100
<i>Skipped</i>	134	

Responding to a further question, 94 people said they knew 2-4 colleagues who had resigned, and 82 said they knew more than 4 people who had resigned. At this point, we do not have the time to disaggregate AMEP versus SEE Program employees.

These data, we believe, indicate a serious crisis in these Programs.

Concluding Remarks

Although a small part of the overall VET system, the AMEP and SEE Program constitute a significant contribution to social cohesion, skill levels and employment pathways in Australia.

In relation to the VET Review's terms of reference, our survey data provide clear evidence that the regulatory settings governing the AMEP and SEE Program are, at least with some providers, failing to ensure that minimum standards are met in regard to physical infrastructure, protection of workers from exploitation, and the credibility of data underpinning at least one crucial Key Performance Indicator that regulates student entitlements and provider contracts. Compliance with this KPI is clearly diverting many of those delivering these Programs from their prime purpose, namely delivering quality tuition in English as a second/additional language that sets students on pathways not only to further training, education and employment but also to participating fully in Australian society. The qualification requirements that govern teachers in these Programs are inflexible, inappropriate, inconsistently applied, and poor quality. They impose costly and repeated financial burdens on highly qualified educators and divert them from more productive and appropriate professional development.

The 116 answers to a final optional Comment question in the ACTA survey give some indication of other issues confronting AMEP and SEE Program educators which we have not covered in this submission. These answers are recorded in Appendix 10. The timing of the VET Review and the closing date of this submission has not permitted us to pursue these issues or disaggregate the data on the matters we raise. ACTA would be pleased to give further evidence to the Review once we have undertaken this analysis.

Nevertheless, these raw data present a clear picture of the AMEP and SEE Program as being currently staffed by a highly committed, well qualified, predominantly female workforce. Like other similar workforces, they are mostly remunerated with low rates of pay, while significant numbers work unacceptable amounts of unpaid hours. Excessive and inappropriate compliance requirements have increased under the current contracts and are undermining teaching. Essential support now rests with volunteers, in some cases by undertaking core duties, viz. teaching whole classes, administering assessments and managing client cases.

It is little wonder then that morale is widely reported as low. But the criticisms of DET policy documented in the Appendices to this submission go beyond the "normal" kinds of complaints in most workforces – they are clearly cries from the heart. We hope the Review will take time to read and consider what these highly qualified, committed and experienced educators have to say.

Our survey data also provides evidence that the Department of Education & Training's "alignment" of the AMEP with the SEE Program has diverted the AMEP from its central role of delivering a unique program that integrates English language tuition with wider settlement and long-term social cohesion goals for this country. In regard to "best practice", the current AMEP contract has destroyed the AMEP's clear position since the late 1940s as a world leader in settlement programs.

The picture that is emerging from our survey is of a vicious cycle that is slowly but relentlessly creating the very problems that its regulatory settings claim to prevent. A broad vision has been trumped by a narrow view of labour market programs. Quality education is being massively eroded by compliance with inappropriate and time-consuming assessment requirements. Professional development is now almost entirely focussed on instructing teachers in compliance procedures. The data these procedures generate are meaningless and exist simply to support the procedures

themselves. Compliance now trumps commitment, specialist knowledge and experience. Morale is nobody's concern. Qualified English language teachers whose professionalism cannot tolerate this environment are leaving to be replaced by "trainers".⁴¹ These trainers hold Certificates in generic skills that supposedly apply indiscriminately across the board to English, massage therapy, retail and fashion design, whose content and timing is set out in step-by-step instruction manuals. As resignations continue, these low level Certificates may indeed become a necessary benchmark.

This downward spiral is kept in motion by the fear engendered by insecure employment, competition between providers to drive down costs, and the self-interest of institutions and individuals that benefit from it. The real costs associated with lost knowledge, infrastructure sent to landfill, and ensuring and monitoring compliance, are hidden. Competition in the AMEP and SEE Program has been a corrosive force, suppressing, exploiting and mocking educational norms, professionalism and altruistic values. Knowledge of and commitment to these Programs by senior managers in the public sector diminishes with every new three (or five) year contract, corroded by competition from private for-profit businesses with no track record in, commitment to, or the slightest knowledge of educational programs, and from private, not-for-profit organisations that cannot sustain programs, and crash or flounder when they discover what is involved. This process is relentless and universal, irrespective of whether specific failures can be distinguished according to public, not-for-profit and for-profit providers.

Whether or not the Review accepts this assessment of the current situation – at least in regard to the provision of English as a second/additional language tuition within the VET sector – the data presented from the ACTA survey should be sufficiently concerning to merit the Review's attention. ACTA is pleased to have the opportunity to present these data to this Review at this early stage of our analysis, and as part of our long-standing commitment to advocacy for quality programs for English language learners.

⁴¹ As per previous footnote re advice to DET that "The much more competitive pricing for AMEP ... has driven down the price service providers charge the Commonwealth for client tuition hours" and that "AMEP providers have identified that they cannot attract teachers with post-graduate TESOL qualifications." *AMEP curricula and teacher and assessor qualifications guide*, p. 63; answer to Question on notice no. 296, Portfolio question number: SQ18-001000, 2018-19 Supplementary budget estimates, Education and Employment Committee, Education and Training Portfolio, Senator the Hon. Doug Cameron, 25 October 2018.

Appendices:
Further survey data including respondents' comments

The comments recorded in these Appendices have been edited only for typing errors and punctuation. Inconsequential comments were deleted.

Appendix 1: **The TAFE Certificate 4 in Training & Assessment**

1. I found the assessment for this qualification to be frustrating and long-winded, given that so much of it required a trial and error approach to slot my existing teaching knowledge and experience into the VET forms, and largely unnecessary for foundation skills trainer/assessors.
2. ASQA RTO standards state that possessing a higher level adult teaching degree is sufficient where one doesn't possess the TAE40110/116. However there is ambiguity around what degrees are considered a higher level adult teaching degree. I possess a Masters of TESOL and other teaching degrees. While I can understand non adult teaching degrees, such as those specializing in primary/secondary teaching, not being sufficient, the fact that ASQA isn't able to provide a straight answer about what degrees constitute higher level adult teaching degrees is frustrating. I can state without hesitation that I learned little to nothing new when completing/updating the TAE qualifications. Furthermore I can state it was ridiculous and belittling to be asked to complete the now compulsory LLN component of the TAE, for the update to TAE40116, despite possessing a Masters' degree in precisely that area and having several years of industry experience in the LLN and foundation studies field.
3. Currently having to do additional module TAEASS502 as directed by TasTAFE. Have had to take two weeks annual recreation leave to attempt to complete (most of) this.
4. Expensive. Time consuming - especially since I'm completing a Masters in TESOL which makes me industry-ready and I'm also teaching/lesson plans concurrently.
5. Obtaining this certificate proved a very taxing exercise. I have a BA in Japanese & Communications, Hons, Grad Dips in Journalism, Applied Linguistics & Teaching English as a Second Language and a Master degree in General & Applied Linguistics, with years of teaching experience in multiple countries at university level as well as in Australia, and trying to have recognition of prior learning was extremely problematic. I paid for an on-line course (\$600) which offered no assistance at all with this....finally insulted and despairing, the time to complete the certificate lapsed. Fortunately a manager at work had previously been in charge of an education provider who issued the various certificates and he knew how to apply the recognition. I had to do only one unit in the end, but I paid another \$600 to finally be given this certification. Without this I would not have been allowed to teach new migrants and refugees which was my strongest interest and heart's desire, but I can't tell you how angry, insulted and frustrated I was having to jump the hoops that it seemed were arrayed against me to actually go on to the teaching work I had most set my heart on. How many other really well qualified and experienced individuals simply give up with the process in disgust?! If the manager hadn't stepped in, I think I might have with many regrets. After so many years of university education and all my experience, I could not stomach not having my prior learning recognised.
6. Ridiculous thing expired 3 months after I paid for the course - I am already a fully registered teacher and Education undergraduate with a degree; TAFE needs to get its head around RPL for Education degrees. I couldn't work for TAFE only volunteer - so I work in another sector - schools (EAL in Year 11/12) - what a joke!
7. Doing Diploma or Masters is all you need. TAE is pointless.
8. Although I am interested in maintaining my education currency and acquiring new skills, many modules in TAE duplicate tertiary units completed previously or relate to PD workshops in TESOL or LLNP.
9. I hate it so much that this is mandatory and that other qualms don't seem to matter
10. It's ridiculous that staff with higher degrees in teaching including teaching practice need to do this in the first place but even more unreasonable that we have recently had to do upgrades in assessment development particularly as many staff are not actually involved in that all.
11. I am a manager and am not required to hold it
12. This is a terrible course and should be stopped as it is SUCH a useless timewaster
13. I cannot see why this qualification is needed when you have post-grad qualifications.
14. A useless course.

15. Onerous to keep upgrading and doesn't give much value - I have a grad dip Secondary with TESOL as method which with the placement at an AMES centre was much more useful in terms of teaching theory and methodology
16. The course isn't academic. It informs us about compliance- how to fill in forms.
17. I have never found that this Certificate value added.
18. I recently completed the TAE update. I would have been unable to do it without help from peers. We all found it a very stressful, demoralising experience. In other words, I passed by cheating. It was a nightmare.
19. No experienced teacher should have to do this.
20. Don't place much value on it.
21. Irrelevant to me as I have a degree in Education
22. This should not be a requirement for teachers with university level teaching qualifications (even if not adult learning)
23. This shouldn't be necessary for a person with a M ED in TESOL
24. Sigh...
25. This seems to be an unnecessary and inappropriate requirement for teaching, especially if you have a lot of on-job experience.
26. Completed 3 units but TAFE were slow in marking and lost the paperwork. Decided to complete the rest elsewhere.
27. It is so pointless to my teaching in the classroom. Merely ticking the box.
28. But am now being told I have to upgrade to a new TAE by end of March 2019.
29. Just when I thought I had finished, we now have to do another unit. TAEASS502 Design and Develop Assessment Tools
30. But haven't upgraded for 2019 because my employer agrees that ASQA recognises Grad Cert in TESOL as adult teaching qualification for AMEP.
31. Awarded as part of my Bachelor of Vocational Education and Training
32. I feel the TAE is totally irrelevant to teaching in the AMEP; it is not in the best interests of the students we teach to be in the VET sector controlled by requirements that are designed for skills based training.
33. I don't believe it serves any useful purpose (unlike my teaching degree, masters in linguistics and tesol and CELTA and DELTA equivalents) or has benefited me in any way . I was forced to do it.
34. But I require the upgrade - 502?
35. Our program is not related to the VET sector and all teachers possess post graduate qualifications and extensive experience therefore the Certificate IV pre-requisite is irrelevant, time-consuming and creates additional stress - to qualify and maintain the qualification.
36. My qualifications plus 35 years' experience in teaching English render the Cert IV in training utterly irrelevant. It is insulting to be repeatedly required to pay to get the ridiculous 'upgrades'.
37. In process of upgrading two required units, even though it's less than 2 years since I completed it.
38. Held in past, no longer deemed necessary due to higher education degree
39. Previous AMEP tender stipulations for qualifications required by teachers appeared reasonable. While I understand the necessity of the TAE Cert IV for those in a training environment who have no teacher qualifications or experience it seems an unnecessary imposition for those appropriately qualified and experienced to teach English as an Additional Language. I found getting TAE Cert IV to be a very considerable waste of time, money and effort, with little flow on to what I do as a teacher in AMEP. I would have preferred to expend that time, money and effort for the benefit of the students in our programs. The TAE Cert IV takes little account of the qualifications and experience I already have, and the requirement to keep updating it, to fit in with ASQA dictates, is galling.
40. I feel upgrading this certificate has taken valuable time and energy I could have done more relevant PD related to my teaching
41. I am currently updating this qualification again. Is it going to be necessary for people with teaching degrees and higher education qualifications to continue to have Cert IV TAE?
42. I hold the TAE40110 and as a workplace mandate I am upgrading to TAEASS502 11/26/2018

43. In the process of the most recent upgrade through TAFE. Very onerous process considering nominal hours.
44. I hold this Certificate but I view it as superfluous for people who already have a Dip Ed and TESOL qualifications; indeed I see the requirement for us to have it as ridiculous. It was created for untrained TAFE teachers and for them it's a good idea, but I question the ruling that all TAFE teachers have to have it.
45. What a waste of time THAT is! Plus, I have recently obtained advice from ASQA that because I have a higher' level qual specifically in adult education (i.e. higher than AQF level 4), I actually am NOT required to have and to keep upgrading my Cert 4 TAE (but no-one ever tells you that!)
46. Irrelevant qualification for the work.
47. Sometimes our higher degrees and diplomas don't get recognised.
48. Don't like that I have to keep upgrading it when I am already fully qualified.
49. My qualification is not from TAFE. I find the skills and knowledge contained in the qualification very pertinent and important in my role in advising and supporting staff and students to work in and navigate the vocational education field.
50. I have also just completed the full upgrade to the new TAE qualification which took a lot of time and effort without seeing any value for undertaking this. Surely teachers with a Master of Education could be recognised and given credit for this.
51. I have 3 versions of this since about 2003/4 - totally useless, self-serving unadulterated rubbish and totally irrelevant to teaching and learning in ESOL. Fully qualified teachers should not have to do multiple versions of this pseudo qualification.
52. I naively thought my days of TAE pain were over (since I completed the final unit in 2016). To my utter dismay, I have discovered just this week that I have to do a unit of study in order to 'upgrade' - a unit that I am supposed to have done by the beginning of 2019 (not happening) in my own time and which I have to pay for! I am not unique. Some of my poor colleagues at Navitas and CIT are required to do several units. I've had a look at the unit I need to do (TAEASS502 Design and Develop Assessment Tools) and it's HUGE! I have to complete 6 assignments, none of which will be related to the CSWE curriculum, as we've been told that because CSWE doesn't map easily to ACSF, we're better off using something simpler (so the teachers at Navitas are doing an FSK Unit for a course in Retail). It is so utterly pointless and ridiculously time-consuming that I just want to cry. I don't know why we have to continuously jump through these hoops to prove we can do our job. Unfortunately, my only option is to do it or quit teaching in adult ed. altogether. I must say, I've been spending a bit of time looking at job ads these past few days! It seems that many of the recent issues with the AMEP program have been due to the Education Dept. trying to fit the AMEP 'square peg' into the VET 'round hole'. I think the original purpose of the AMEP - as a settlement course - has been lost on the way. It's a terrible shame.

Appendix 2: **Facilities**

1. Some classrooms are good but many are awful, no windows, no technology, not enough space to move around.
2. Technology is satisfactory in the rooms where it is available, but is problematic in the rooms where it is a mix of old and new technology. Staff prep areas are very noisy when everyone is at their desk and the kitchen facilities are not designed for people to do anything except put food in a fridge and make drinks and wash dishes. There is no place to sit and socialise with colleagues unless you go to the student cafeteria
3. Many of our classrooms are very nice and the teacher areas are new and comfortable. But some of our classrooms are windowless boxes with no technology at all. We were promised that these rooms would be upgraded within a year of our arrival, but nothing at all has been done. Compounding this is that we have been told that we are not allowed to put anything on the walls (no maps, posters, student work - nothing). It is very depressing for the students, and some traumatised students find it very difficult to be in these rooms.
4. Unfortunately, being a small campus, there is not a computer room available for my students as it is taken up for IT students.
5. We share a building with other organizations. Everyone uses the same kitchen and toilets. The classrooms are small and stuffy. The centre has no windows. There are Chromebooks for students to use, but when they are broken, nobody seems to fix them.
6. Some classrooms are good; others are not. The air quality, heating and air-con are very different in different parts of the building. Quite a few classrooms have no natural light or windows.
7. TAFE has very visible OHS issues compared to the work conditions of school teachers; the staff room is cramped, poorly equipped and the tea/lunch making facilities are in the same open area; staff have no privacy; however some TAFE teachers are blissfully ignorant of what they do not have and grossly dismissive of registered ITE teachers, when in fact they are lucky to have them as volunteers
8. At Navitas the chairs were the cheapest and not good for students (hard plastic with no padding and not terribly ergonomic). There were laptops but the wifi was extremely unreliable. I set up my own class libraries for each level and paid for everything out of my own pocket. There weren't enough student toilets for the number of them. There was one disabled toilet that had a 'Staff toilet' sign put on it. The staffroom was way too small for the number of teachers using it but it seems their new venue will be even worse.
9. Eventually Max Solutions had some things in place, but on the first day there were no toilets/kitchen available for students to use and they were told to go across a busy road and use the public library across the street. There was nothing in the way of recreational facilities for students but by about Week 6 they had an open area upstairs for students to use during break time. Staff facilities were shared with general Max Employment staff and I think some staff were a bit put out at having their space invaded. Classrooms had to be built during the first few weeks which meant many students had to suspend their studies while construction was going on. The classroom I taught in was pretty cramped for the 20-25 youth students I had. There were banks of Chromebooks available for use in class but I had to negotiate with other class teachers to use them but there was no booking system so it was essentially first in best dressed. No smartboards, had to haul in a projector and set it up in a cramped classroom. Admin was essentially a single desk in the foyer. No staff room and no place to get away from students, and admin staff would try and 'catch' me during lunch break to answer questions. I would literally dash out the door during my lunch break so that I could just be alone and in a quiet place for 30 minutes.
10. For classes held outside the main campus, the classroom facilities and technology were quite unsatisfactory.
11. Facilities vary depending on the classroom. Some have no facilities, others have projectors and laptops Majority of these do not have means of playing CDs

12. The ventilation in the staff room and classrooms is often not good enough. The air seems thick and stale at times. Often I and some of the students experience sneezing, light-headedness and the need to go out for fresh air. Student toilets are often very smelly during most days. Staff toilet is relatively clean but sometimes dirty.
13. Many classrooms are good however have constant problems with heating and cooling in some over Winter/Summer...seems to have been an ongoing conversation since I started - 5 + years ago
14. The student iPads had some problems but we are working on them.
15. Outdated facilities.
16. There is never enough indoor recreational/lunchtime space for students. The staffroom is extraordinarily overcrowded, noisy and very difficult to work quietly and creatively.
17. There is a small office for all teachers, and at peak hours all teachers have to fight for a computer. There is not enough space for storage. Moreover, the staff room is cold in the winter, and hot in the summer.
18. There are no teacher-only toilets.
19. Classrooms are never cleaned properly - cleaning only covers the floor areas not table tops, or seats or the chewing gum stuck under tables, or the whiteboard ledges, or the windows. The computer labs are old and clunky - poor lighting, worn out seating and the systems are very slow. No separate toilets for staff and toilets are infrequently and not properly cleaned - an ongoing reporting the problem but no real results situation.
20. A staff room did not exist when I worked at Max Solutions. I understand there is a small one now. Staff and students still share toilets. There is no dedicated room for private conversations between trainers, managers, admin staff or students. Casual migrant admin staff (5 people do paid work one day a week helping admin staff and trainers), have access to trainers and students personal information and details.
21. "Once upon a time" there was a cafeteria on campus; now students bring their own or go off campus
22. Teachers should have more space.
23. What is very satisfactory? If it exists, is clean and functional then it is very satisfactory. The community classes and regional centres may not have all the facilities as listed. Community classes often do not have access to technology/ library.
24. Because we teach by distance, our AMEP students do not attend the centre. They live all over Australia. The biggest problem for us is noise. We can hear other teachers and people walking through the building.
25. TAFE Digital has no provision for students' onsite learning.
26. Technology: sometimes not enough computers for number of students in the classes Library: more updated resources are needed, More bilingual dictionaries. Toilets: they need cleaning hourly. Staff share toilets with students and visitors. Never been in a workplace before where staff didn't have their own toilets. NO First Aid room in this building either.
27. Do not have separate staff and student toilets.
28. Distance learning teaching environments: attention to noise levels in the office is required . Partitions would be useful as opposed to the open plan office setting
29. Open spaces are not conducive for concentration or creativity. We are like battery hens in aisles.
30. The building we occupy consists of concrete blocks built in the 60s. There are holes in the staff room ceiling and when it rains we have water fountains flowing down the stairs from the 3rd to the 1st floor. The lift is ancient and staff and students have been trapped in there. It has been repaired but obtaining parts proved difficult. Air-con often cuts out and the wifi etc is unreliable. Facilities and IT constantly attempt to fix things (they are a boon to their profession) but the age of the facilities installed means it's an uphill battle. Currently things are being patched up as a new architecture designed complex is in the process of being built in the TAFE grounds. The construction work surrounding TAFE adds to the chaos. A sign had to be placed at the front of the building to indicate we were still open for business. There is a new library but no independent learning centre.
31. Not much in library for teachers. Classroom cold and dusty, so unhealthy. No interactive whiteboards. No water in reception.
32. My campus has very good facilities. However the PTA room is somewhat isolated and there is no duress alarm

33. It's a very old TAFE campus but is good enough for what we do.
34. We have been directed to use more technology in the classroom and one day a week my role is to support teachers in being more digitally innovative. However, we do not have enough computers/devices to do this so teachers are not able to use technology except in a very peripheral way. Teachers do not have a separate lunch or kitchen area to spend time together away from students.
35. Staff room is very crowded.
36. Old building; plumbing is appalling; 20 teachers in a space previously occupied by 4 teachers in the last contract; no onsite IT support; no separate tea room despite union requests to supply a space and this is unlikely to change with the move to a new venue. Chairs for students are uncomfortable and not good for people studying for 4-5 hours. Desks are fine. Centralised heating is poor, but addressed by management to improve the cold classrooms.
37. We should have smart boards in every room a permanent room. Ideally there should be computers for all students.
38. Staff and students share quite adequate toilet facilities. We don't have a staff room. We have a lunch table in a large elongated room, which is the work space for 12 teachers. As lunch times are staggered teachers at work at their work stations find it difficult to isolate themselves from the noise of lunchtime chatter.
39. Complete joke.
40. Toilets are in demountable facilities.
41. Teachers' office space very crowded with unsatisfactory space for storage - dark and dismal. Teachers' resource room lacks space for ease of usage - dark and dismal.
42. Our classroom has poor ventilation, 2 of the 5 fans are broken, 2 of the 3 air con units are broken, there is no heating so it was quite uncomfortable in winter. We have computers, but they are not networked in any way, and the projector doesn't work (and the projector screen covers the doorway for some reason, so no one could enter/leave the classroom while the screen was down anyway), so I can't show my screen, videos or Power-points or anything like that. There is no covered area for students to sit and eat their lunch, and there is no indoor space for them to spend time together. There is a pool table in the canteen, but it is very cramped uninviting space and no one uses it. The library isn't a bad space, but there is not much there in the way of books, so the students don't use it. I have brought my own books from home that they can borrow, so that they can access reading material easily.
43. Toilets smell, there's no ventilation. Old. The technology is very bad, computers take a long time to start up, software is old and slow. The classrooms are drab, not all rooms have a computer and Benq.
44. Our facility is a mix of old, unsatisfactory buildings and some beautiful, well equipped new buildings.
45. Keeping our IT services up to date has become a real issue. We receive much less AMEP funding which has affected things like IT, and extra-curricula activities which are important in the youth program.
46. Some classrooms are excellent but some lack computers which is a major hassle.
47. A place for students to have lunch in the same building as classrooms? No. Students sit on couches with microwaved lunch on their knees!
48. I work in a small centre which is relatively comfortable. We have reception area which now has an admin person about half a day each week.
49. Ventilation is very poor. I have reported and complained many times which falls on deaf ears. The room has no natural or built in ventilation and so smells very mouldy - a work place health and safety issue I'm sure. It is a room built within a room, done on the cheap without proper planning. I asked for a window - they gave me a small frosted one that doesn't open, so no natural light and no fresh air.
50. Poor signage in to EAL main building.
51. Very new, all whiz-bang but not ideally fit-for-purpose, given the clientele. Well-located.
52. The buildings are old, nor adequate air-conditioning in many classes, staff kitchen doesn't have soap and paper towels, teachers provide that at own cost, as well as the kettle. The photocopiers are a joke, they are so old and broken more than half of the time. Teachers' valuable preparation time is eaten up by photocopying and often by the meetings.
53. Library, toilets and recreational areas are "borrowed" from CIT (local TAFE institute).

54. Our computers are old, more than 5-6 years, Our computer class room printer is more than 10 years old, We only have one colour printer that often breaks down, We don't have any smart boards onsite.
55. Computer room no longer available for classes I teach, and library computers are always booked by other teachers. Occasionally I can access Ipads. Wifi doesn't work for students, and often doesn't work on Ipads so can't rely on using them.
56. Although I am employed by TAFE, I work at a community centre, and we do not have any computers or Wifi access for students, which I believe contravenes our contractual obligations.
57. Students are unable to use technology as they don't have student numbers due to TAFE's new system. This also hinders their ability to gain transport concessions
58. Admin & reception areas too small for storing all the necessary paper work/student portfolios etc. Storage is split between 3 levels of the building making work tasks inefficient and time consuming when retrieving files.
59. Administration area located in crèche at Balga campus.
60. I am located at a community centre, where students do not have access to Wifi or computers, which I believe contravenes or contact obligations. It is very challenging to assist students with typing up essays when we do not have this basic technology.
61. Basic technology is there but we do not have any smartboard (too expensive), only projectors with no interactive feature. The classrooms are adequate, but broken blinds on the windows make it difficult to see the projections clearly. This is a campus maintenance issue, and I've been told there is no money for this.
62. Bad air con, very hard to work in. Share toilets with students. Only one sanitary disposal box in the ladies' toilets
63. Toilets are shared with students. There is little heating and cooling in most Migrant English classrooms. HQ to our horror were moved into the library and are front of house - very threatening look. Staff room is cramped though there is a TAFE staff lounge in another building.
64. Our ventilation and air con is totally unsatisfactory.
65. The air conditioning often plays up in the building where the classrooms are located. There are no sporting facilities for students.
66. Not every classroom has access to the same technology, it depends what classroom you are in, this also applies to ventilation and heating.

Appendix 3: Acceptance of the ACSF as a tool for assessing learner progress

Chart 4 and the accompanying Table 11 document responses to the question “Based on your professional experience with the ACSF, how suitable is it for assessing adult migrants’ English language learning in the AMEP and/or SEE Program?” (Q73).

Chart 4: Respondents' Views on the Suitability of the ACSF for Assessing English Language Learning

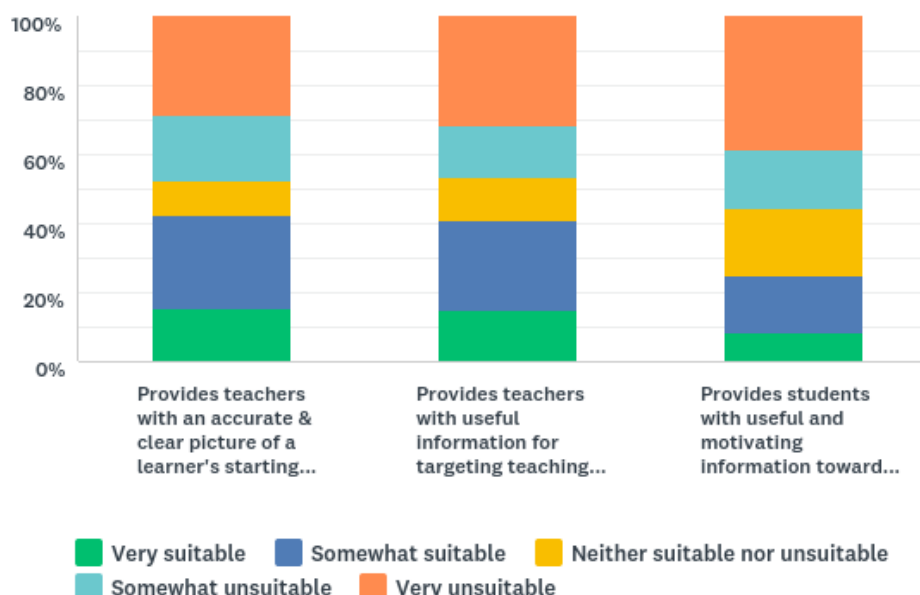


Table 11: Respondents' Views on the Suitability of the ACSF for Assessing English Language Learning

Evaluation	Very suitable	Somewhat suitable	Neither suitable nor unsuitable	Somewhat unsuitable	Very unsuitable	TOTAL RESPONSES
Provides teachers with an accurate & clear picture of a learner's starting point & progress in learning English	36	65	26	48	70	245
Provides teachers with useful information for targeting teaching to meet learner's English needs	35	64	32	36	78	245
Provides students with useful & motivating information to improve their English	20	41	48	42	94	245
TOTAL						235
<i>Skipped</i>						177

Although a sizeable number of respondents (100) saw the ACSF as suitable for assessing learner progress, a slightly larger number (112) thought it unsuitable. In ACTA's view, this level of disagreement is an unsatisfactory basis to support a crucial KPI.

Below is the complete set of accompanying comments (favourable and unfavourable). In ACTA's view, they are prima facie evidence that the ACSF cannot provide valid and reliable data to support a KPI.

Comments

1. The ACSF is a huge burden on top of the CSWE.⁴² ISLPR⁴³ provided an adequate overview of a learner's starting point. Initial ACSF assessments favour underestimating skill levels so that progress can be demonstrated later on.
2. Given that students can receive a great level of support to achieve the indicators, it can make the assessment tools meaningless.
3. I do not believe that the ACSF has any benefit for students who are learning a language. Language acquisition is not linear. It also does not provide the teacher with any more information about the students' progress than everyday class interaction.
4. The CSWE assessments are sufficient to assess client's progress.
5. For lower levels, the ACSF is more confusing than explaining the curriculum to the students, and the possibility of support means that teachers are left wondering how much did a student really do on their own.
6. The students are not interested in their ACSF assessments. They are much more focussed on their curriculum assessments
7. It's supposed to give the teacher and student a clearer understanding of student progress, but it's so lengthy and the answers required are so long, that by the time it's completed and all the paperwork has been done, there's no time to actually come back to it and discuss the student outcomes with them. There is no time in class to really discuss the assessment outcomes. Also, because there are always new students arriving, we have to move on to the next thing and get the new students started on their assessments, otherwise they won't have time to completed all the tasks and achieve the certificate.
8. Please abandon the ACSF! I can't imagine how it would help for any context but definitely not for language learners!
9. Whoever decided that this is a suitable assessment framework for the AMEP has not had enough experience dealing with the settlement and language needs of newly arrived migrants.
10. The previous ISLPR gave a much clearer indication of a learner's starting point and information about how to target learner's needs
11. It isn't appropriate for assessing students' English level.
12. CSWE was better for communicating with students as ACSF is too detailed for them to understand.
13. It's really a huge impediment to getting on with needs-based teaching and there is NO value in it whatsoever for teachers or for students. If more PD is required, let's target it to teaching a settlement curriculum and effective ways to deliver, NOT focus all this energy on proficiency assessment and documentation. Such a huge focus on proficiency levels is pointless and unnecessary at these levels and with this client group... we need to focus much more energy on teaching!
14. I BELIEVE THE ACSF WORKS WELL AS A REPORTING TOOL.

⁴² CSWE = the Certificates in Spoken & Written English. The assessment system incorporated within this accredited curriculum was previously used to assess learner progress. The new contracts made use of this curriculum optional. The CSWE was developed for the AMEP in the 1990s and has undergone various revisions. It has a well-developed assessment task bank. The question of curriculum is complex. For ACTA's position on this issue, go to:

http://www.tesol.org.au/files/files/591_Problems_in_the_AMEP_SEE_Program_25_May_2018_-_an_ACTA_Background_Paper

⁴³ ISLPR = International Second Language Proficiency Rating Scale. See Appendix 4 for more specific Comments on the ACSF in relation to the ISLPR.

15. As each student needs to complete different ACSF indicators and these may involve doing 7 different ones for a class, it's very difficult to juggle all this. Then on top, we have CSL curriculum to test them with as well as the more important settlement issues to deal with, then personal, emotional side of students' lives in the new country i.e. getting around using Go-cards, banking, renting, culture etc.
16. The ACSF may be good for teaching one on one. However, it is vague, and its principles are unsuitable and impractical for being implemented in a classroom of twentyish learners. Moreover, it is not a curriculum, which means teachers have to assess to it and then assess to another curriculum as well.
17. Not appropriate for classroom teaching. Designed for one-on-one teaching in the workplace.
18. The levels are extremely broad and do not fit the natural flow and development of additional language acquisition. The ACSF seems to measure exposure to Australian schooling norms and is very focussed on literacy capacity.
19. I'd say most students are not at all familiar with the ACSF.
20. Generally speaking I teach despite the requirements of the CSL and ACSF. It is the onerous assessment system and documenting requirements, the micro-management, that is the major obstacle to supporting our role and addressing student needs.
21. ACSF is a literacy framework and it is NOT suitable for teaching and assessing a language to ESL learners.
22. Just an exercise providing pointless paperwork under the fear that it will then be audited.
23. What does it give? Students can't understand it. It's just a reporting tool - it's been unsatisfactory as a placement tool as far as I can see (lots of odd placements) (and a source of tediously long assessments... which students HATE!)
24. The ISLPR was a more effective tool. There is so much assessor error with the ACSF. I've had students in classes who've been rated as ACSF 1 and they are really closer to a 3 or vice versa. Then they end up in the wrong class and the student complains or it makes so much trouble for them because they think they are better than what they are and when you try to put them in the correct level their self-esteem is damaged and they don't return. Or basically because the class is not their level they don't come. The students don't understand the ACSF, it's too complex. They are ESL learners!!! ACSF doesn't motivate anyone. It is just another document we have to use to develop tests and align things to!!!
25. The ACSF data is useful. Attaining the data is highly time-consuming.
26. If done right, ahead of time, it could be useful. Why not use pre-written Australian content geared at different levels like the private sector? Why keep reinvent the wheel with teachers writing it all the time & wearing themselves out?
27. The third question is not relevant as the ACSF is an assessment framework, not curricula.
28. The ACSF is a good tool of measurement but what I am dissatisfied with is the jump in levels - e.g 1:05/1:06 to 2:05/ 2:06 is unreasonable.
29. My students are at Prelim level and would have no idea of what I am trying to achieve when testing them for ACSF gains. It is not used in our centre as a guide for assessing their English. It is really the CSWE assessments that are used for this. The ACSF indicators are just another administrative job we have to perform every so many hours to be accountable to auditors etc.
30. The ACSF gives very specific information to determine where a student is, and what skills they need to reach the next level.
31. Does not inform future teaching at all.
32. One example which best shows the inadequacy of the ACSF is their mention of prepositions: ACSF mentions them 4 times,(repeated twice for total 8) 2.03 Comprehends texts incorporating adjectives, pronouns and prepositions . 2.06 2.07 2.08 Uses (follows) adjectives, pronouns and prepositions to describe people, places, things and events. CEFR, ISLPR and standard grammar teaching for ESL all recognise and separate prepositions into levels of difficulty. Which language acquisition experts or academics have looked at the ACSF in the light of ESL?
33. Again, tricky question! I find the ACSF as a good tool for initial assessments; however, useless when it comes to progressives. It helps the teacher target initially, but not as the student improves.
34. Completely irrelevant and inconsequential.

35. The ACSF does not align to non-ESL needs. ESL learners learn English skills in a different way than a native speaker, so should not be assessed using the same criteria. It is not an even playing field.
36. It is a pitiful attempt to impose barely-concealed economic/financial hegemonic free-market principles while masquerading as having pedagogical value - IT HAS ZERO PEDAGOGICAL VALUE
37. It does seem very accurate at identifying a student's exit level, which is great. But I question how useful that is for teaching that student over ISLPR/monitoring that student in class. Certainly I don't think it is worth the additional burden it places on teachers. If the burden was reduced, I would certainly be praising the ACSF for its accuracy.
38. It is very micro as opposed to the macro of the unit of the training package. I have to do an assessment for ACSF and then a different set of assessment tasks for the specific training package unit
39. Way too complicated. The write-ups are much too much. Teachers end up copying and pasting and changing names and pronouns to suit new learners. Not helpful.
40. It might give helpful information but learning is driven more from the curriculum needs.
41. A far better assessment tool would be to simply use a good curriculum such as CSWE. Sorry - it just provides a burden and an extra requirement on teachers. Many of the tasks used to assess it are done as an extra to what is happening in the classroom.
42. I have been advised by teachers to simply write answers to ACSF tasks on board and have students copy answers, as the tasks are unrelated to what students have been learning.
43. I mainly refer to a student's ACSF indicators to check which assessment tasks they need to complete.
44. Again, this is based on literacy not ESL.
45. The ACSF provides me with a guide but my students just want to improve their English. They don't care about certificates and some tests are totally irrelevant to them like reading recipes.
46. It provides a picture that can be obtained more easily and more quickly by simpler means. It is overly complex and long, and so mostly unnecessary.
47. A flawed useless instrument.
48. The ACSF is not suitable in so many ways. Because of the subjective initial assessments, students are misplaced into classes/levels. Students do not understand what the indicators mean from the initial assessment and with progressive assessment. It is purely a tool for providers to give to the government. It is counterproductive because too much time is taken up with trying to do assessment tasks for the sake of ticking a box for KPIs. Although assessment tasks can be useful in delivering a topic, too much is left out of really teaching what is required to be able to say with confidence that a student has progressed from one indicator to the next.
49. Individual assessments in particular usually have nothing to do with what you are teaching and are a complete disruption to the students' learning. They do not prove anything as they are "supported" in the assessment and often helped to "fill in every gap"!
50. Students are not very aware/not told about their own ACSF levels.

Appendix 4:

The suitability of the ACSF versus ISLPR in documenting learner starting points

Before the current contract, the ISLPR was used to assess incoming students to determine eligibility (i.e. they had less than “functional English”) and placement in classes at relatively homogeneous levels. Its development began in the 1960s and it has been successively refined since then.⁴⁴

Table 12 shows responses to the question (Q68): *“In regard to placing adult migrant English language learners in the AMEP and/or SEE Program, what is your professional opinion of the ACSF compared to the ISLPR?”*

Table 12: Respondents' View of the ACSF in comparison to the ISLPR

Comparison with the ISLPR	No.	%
Much more appropriate than the ISLPR	15	10.87%
Somewhat more appropriate than the ISLPR	10	7.25%
No more or less appropriate than the ISLPR	19	13.77%
Somewhat less appropriate than the ISLPR	9	6.52%
Much less appropriate than the ISLPR	44	31.88%
I've never used the ISLPR ⁴⁵	41	29.71%
Total responses⁴⁶	138	100
<i>Skipped⁴⁷</i>	283	

The table shows 54 percent (n = 53/97) of those who had used the ISLPR rated it as superior to the ACSF.

The complete set of comments accompanying these responses follows.

Comments

1. The assessments are too long and time consuming. There is so much unnecessary annotation that doesn't assist at all in placing the client. There's so much focus on covering enough points, so you have enough material to be able to complete the annotations, so that you're once again focusing on compliance rather than on clients' needs.
2. I would tick appropriate if it were to measure explicit skills; however, the ACSF is an extremely complicated document, and unnecessary at such an early part a students' settlement to measure client proficiencies. It doesn't improve client learning, and support their scaffolding to learning.
3. Ridiculously complex; meant for native speakers
4. THE ISLPR IS TOO NARROW AND TEACHERS ALL HAVE DIFFERING INTERPRETATION OF LEVELS. THE ACSF IS CLEARER AND THE PD PROVIDED BY LWA SUPPORTS SHARED INTERPRETATION AND UNDERSTANDING OF THE ACSF.

⁴⁴ <https://www.islpr.org/>

⁴⁵ These are likely to be mostly SEE Program teachers/assessors.

⁴⁶ The total number of responses reflects the number of people who undertake initial placement assessments. This task is allocated to designated people.

⁴⁷ The large number of “skips” is partly attributable to the fact that the survey “skipped” those who did not do initial assessments past this question.

5. Teachers, and the “30% student contact time” tutors don't have time to critique an assessor's long-winded ACSF assessment. Students settling and having an initial assessment are often unsettled and need counselling (more than “academic” counselling). The AMEP assessor's role should be strengthened to include more than academic counselling. ISLPR assessment is based on the 4 core language skills which are an essential base of any education system. Changing Information Technology influence core services is an area of increasing need for students, and this should be considered as a core life skill to be included extra to the ISLPR.
6. ISLPR describes the macro skills of an ESL learner. ACSF benchmarks skills for Literacy. ESL is not Literacy.
7. But far more complex and unnecessarily so.
8. I like the ACSF because it is very specific in addressing an evidence base.
9. The ISLPR was purpose developed for ESL/CALD. The ACSF does not have any relationship to ESL/CALD. It is completely inappropriate.
10. ACSF is suited to language and literacy skills in general, not the language and literacy skills of English learners. It is a very basic pedagogical difference.
11. I did not do placements with ISLPR. While not perfect, the placements were generally well done under ISLPR. The Learning indicators .01 and .02 being required in English give a false measure of a student's ability to learn, identity as a learner, and plans for pathways. I urge placement decisions NOT to include .01 and .02 at all. These indicators were obviously designed for native speakers of incremental levels of self-awareness. Asking an AMEP client 3 weeks off the plane to know anything about the validity of their qualifications or their knowledge of local educational opportunities is inappropriate at that time.
12. It doesn't do that much of a better job, and it takes so much more time for the assessor and the student.
13. Specifically it contains elements in relation to learning strategies that are culturally specific and not necessarily a true reflection of the learner's capacity.
14. The SEE program has never used the ISLPR. The ACSF is appropriate to SEE and completely inappropriate for low level AMEP clients.
15. I need more time to consider. Thus ticked neutral box.
16. The ISPLR was created for the specific purpose of assessing language levels by language specialists and researchers. The ACSF was not. Simple comparison. Square peg - round hole.
17. The LWA assessment tool kit we use for the purpose is highly undeveloped in correctly assessing learner's language needs. It has to be modified greatly to correctly assess every learner
18. It's much more time consuming to justify your decision on placement with the ACSF.
19. The ISLPR had levels which made sense and which related in a comprehensible way to the process of learning a new language. It was a much more straightforward and easily applied diagnostic tool than the ACSF.
20. The ACSF is totally inappropriate for settlement.

Appendix 5: The effect of professional development on their satisfaction with the ACSF

Initial adverse evaluations of a new assessment tool might be supposed to stem from unfamiliarity with it, which can be mitigated by professional development. Table 13 shows responses to the question “*What effect has professional development (PD) had on your professional opinion of the ACSF?*”

Table 13: Effect of Professional Development on Satisfaction with the ACSF

Effect	No.	%
Increased my satisfaction with the ACSF	86	28.86%
No effect	85	28.52%
Increased/caused my dissatisfaction with the ACSF	112	37.58%
N/A: I've had no PD	15	5.03%
TOTAL	298	100
<i>Skipped</i>	124	

Table 13 shows that professional development increased satisfaction with ACSF of nearly 29 percent of respondents, while 38 percent were more dissatisfied and 29 percent did not change their views.

The complete set of comments that accompanied these responses are as follows.

Comments

1. The ACSF is a shoe that doesn't fit the AMEP foot!
2. The ACSF has caused a great deal of anger and angst among teachers, not just because of the huge workload increase but because it has absolutely no value as an indicator of progress. The workload increase is exacerbated by the students' resentment at having to do MORE tests, and by the fact that it takes them away from their learning. The workload is doubled by having to find time to test as well as having to prepare the tests, annotate them and then write a report (originally 2 reports.) Our requirement has recently been reduced but it has still has a huge impact on our daily workload and stress.
3. I do not believe this is the best system of assessment for our students
4. The PD has highlighted the inadequacies inherent in the ACSF as a tool for native speakers of English and the expectation that teachers have no life beyond the classroom as the paperwork expected to meet the requirements for assessment are well beyond what should be necessary.
5. Having said that I feel that CSWE and the ACSF often do not marry and there are times the assessments given need to be modified to satisfy the ACSF curriculum.
6. At least I understand it now and how to use it. However, I'm not happy with it - it's cumbersome and unnecessarily time consuming. In my opinion it's over compliance and does not help the students to improve their English. In fact, it hinders them because too much time is spent on compliance and not enough on actual teaching. All the teachers are stressed and over worked, especially those who have multi-level classes with high numbers
7. In my opinion, the ACSF is not suitable for clients with non-English speaking backgrounds who learn English as their main goal. Its indicators cover a wide range of performance features which students cannot perform in the assessment tasks. The more we learn about ACSF, the more I wish we could stop using it and focus on a curriculum. How can we “tailor to individual needs” when we have a group of multi-level students with spikey profiles and start at different times? 1 trainer to 20 students? Many if them are illiterate, and cannot even write the words on a straight line. Another big lie! Sorry!
8. The answers are really not very apt. I would have preferred to check, 'Increased my knowledge of the ACSF' (as a result of PD).

9. I have had to do all my own research and others ask me for advice on calibration to IELTS/ Cambridge and EQF/CEFR frameworks. It's part time research I have been doing. My professional development is self-motivated and some it is automaton. University Ed faculties should be teaching in service teachers and ITE undergrads about the ACSF
10. The ACSF is a perfectly fine tool for native speakers of English. I believe it has very limited applicability to students who are at or below a functional level of English. My main cause of dissatisfaction is that now is excessive time spent on numerous checks and balances for compliance, and this is time wasted that could be spent on improving learners' functional English. I already believe that 510 hours is not adequate to achieve this. These are largely marginalised and vulnerable people we are dealing with, they deserve to be treated as more than just a series of check-boxed and performance indicators. I understand that compliance needs to happen, but I believe it was working just fine before with the ISLPR and learning outcomes of the CSWE.
11. ACSF is an excellent Skills Framework which I believe should be used to inform the TESOL and LLNP practitioners choices in terms of text types, their language features and functions. However, there has been a growing frustration among TESOL/LLNP professionals with the TOP DOWN approach to programming in AMEP/ LLNP courses which could be counterproductive and may reduce teacher initiative and creativity in developing lesson plans addressing students' needs.
12. PD sessions have shown the ACSF assessments to be a futile, meaningless, time and money wasting activity for taxpayers, students and teachers.
13. Does not work with our cohort of students Migrants/refugees/asylum seekers - quality has definitely been compromised with this fixation on ACSF indicators, tests, ongoing assessments for progress. Our poor students are inundated with tests and us teachers.
14. ...but still not really satisfied with it.
15. THE LWA PD WORKSHOPS ARE TARGETTED AT WHAT PROVIDERS NEED. THE WORKSHOPS ARE PROFESSIONALLY PRESENTED AND THOROUGHLY COVER USE OF THE ACSF.
16. It's just not appropriate. Students need to learn English before they can get jobs!
17. ACSF might have some kind of place in the world of literacy but it's being overkilled in SEE. Assessing students against the ACSF is intrusive and overkill in terms of assessing people's objective numeracy and literacy ability.
18. Every single teacher I have talked to hates the ASCF with a vengeance as it is so vague and each teacher can interpret in their own way. What are basic tenses? What is the vocabulary that distinguishes the levels? Why do I feel that .03 and .05 are not testing students' proficiency but are testing the tests themselves? The ACSF is bizarre, ambiguous, nonsensical and unlike any textbooks or curriculum I've ever encountered in my whole life as a language learner myself (for 10 years studying the language intensively) and then as a teacher of the language for 16 years now. I am a practitioner, not a researcher; therefore I am not equipped with the skills to support my claims with solid evidence. However, I can state that there is something seriously wrong with the Framework, and when it is a unanimous opinion it is to be reckoned with.
19. The ACSF was designed for the workplace and for one-on-one (teacher and learner) teaching. This has been transferred to the classroom, so now the teacher has to juggle whole class teaching and individual teaching/assessment. It is onerous. I have had up to 4 groups in a classroom doing ACSF tasks as their assessment tasks were due. This is not uncommon.
20. I've become familiar with the ACSF and competent with using it for initial assessments but I don't think it is an appropriate framework for students seeking to learn English as an additional language as it is so culturally based - presuming exposure to western industrial schooling systems.
21. ACSF benchmarks have nothing to do with ESL learners.
22. Professional development has been very limited and was given after the fact.
23. I don't believe ACSF or CSL should be used to teach and assess ESL learners - they are literacy based not language based.

24. The attitude of LWA at the start of the contract was disparaging of CSWE and settlement and of the processes we used to assess and judge performance. Particular staff at LWA saw themselves as kings and queens and us as their subjects and expected us to treat and follow them as they demanded. Feedback to the DET/AMEP has seen a reduction in this attitude. I still believe the ACSF should not apply to AMEP students and over assesses them to the point they do not enjoy class.
25. It is not useful as an indicator of student's abilities.
26. The more we discuss it, the more dissatisfied I am.
27. Not fit for purpose.
28. I don't dislike it - I think it's a reasonable tool for description, especially for native English speakers - but I'm not so thrilled with it for our learners. I'm really, really sick of the way we have to provide so much detail for the auditors, however - it just seems to be making work for someone...
29. We've had very little PD.
30. The ACSF is old. It was originally designed for individual assessment for people in the workplace to decide what level of literacy and numeracy they have and to determine what course they need to do to upgrade their skills etc. It doesn't assess students' understanding of intercultural nuances. It fails to identify what students don't know and need to learn. The ACSF is like NAPLAN and forces teachers to just prepare for that test so students pass and the KPI is passed so that the provider gets their funding. Benchmarking students to a particular test written by a particular cohort of professionals such as the ACSF assessments as at the entrance to the AMEP needs reviewing. What are the gender, ethnic, geographic and class biases represented in these assessments? Is it a world class recognised benchmark? Students get far different results on the ACSF entrance test versus the BKSB. So which is the real benchmark for students' performance? Both are based on granting funding to students.
31. PD - TAE - none whatsoever.
32. I had a little bit of training but it was so inadequate. No glossary of terms. No examples. No manuals. No bank of material and no file path. A hopeless situation.
33. Hasn't altered my opinion though has made me more familiar with it and therefore made it a little easier to use as required.
34. I am required to participate in approximately 60 - 70 hours of PD a year but have avoided this so far. However I think the ACSF is an excellent tool.
35. It's too detailed, ISLPR is sufficient enough.
36. Not exactly increased my satisfaction but allowed me to better understand what was required and so be a little more efficient in dealing with the paperwork.
37. From scathing to tolerant.
38. It is still a farce but that is because we obviously have to try and make it look like students have increased their ACSF scores when they often haven't and it increases teachers workload exponentially. The actual assessments I think are good
39. This is a tricky question. Initially, I embraced the change as a way to help my beginner students' progress to be recognized (as compared to CPSWE). But after a year of using the ACSF, for progressive assessments, I have found it to be totally inappropriate in measuring progress.
40. In particular one of the employees that facilitated the forum at the beginning of 2018 was abrasive, unapproachable, cold and lacked empathy and understanding with the group in general.
41. I'm totally ok with the ACSF. I am experienced with the ACSF.
42. A waste of time, as there have been changes made every meeting - the system was not thought through before it was introduced, and there was a total lack of resources.
43. At a PD session run by LWA, they introduced a term - "non-continuous text". None of the 100- plus lecturers present had ever heard of it, but LWA stressed its importance. I stood up and asked them to define/clarify it - I was rebuffed with the contemptible and contemptuous answer: "It's implicit." This meant that the woman herself didn't know but was unwilling to admit the fact; it is not insignificant that she is one of the people who bought the whole thing from Linda Wise [I can't remember her name - I only remember her appalling attitude].

44. I have a better understanding of the ACSF as a result of PD, but I couldn't say that it has convinced me why it is better than ISLPR for initial assessment of students for placement in our program, or how it improves teaching of English to CALD clients.
45. Every time I had PD on the ACSF I felt I was being asked to do something that was meaningless, considering that the CSWE is aligned to ACSF levels. Why have 2 benchmarks for language development?
46. The ACSF is not appropriate to the area of language learning. There have been decades and decades of research by language specialists to develop language specific assessments. The ACSF is to language is like a square peg into a round hole.
47. A mess.
48. I understand it better, but it remains just an irritant really.
49. Our internal PDs are only catering to the curriculum-CGEA but external workshops/PDs are once a year and only relate to ACSF.
50. PD was irrelevant and only happened in June. I had already worked out and found information I needed on ACSF from other teachers and from own reading.
51. ACSF does not fit with an English as a second language course. ISLPR is the appropriate and tested method of assessment.
52. I have had PD on the ASCF but I still don't feel familiar with it.
53. When I first started teaching at TAFE, I used the National Reporting System. When the ACSF was introduced, I went to the initial PD sessions but by default I ended up being timetabled on AMEP classes. Then with the new AMEP contract, I was suddenly placed with having to use the ACSF. The PD I have received over the years have been piecemeal and of little substance. There is a lot of the blind leading the blind. From my reading of the ACSF document, use of it and by my observations, I find this to be a very, valid tool in so many ways. Both the AMEP and SEE are now meant to use ACSF indicators to place students into classes but initial assessors vary significantly in how they 'subjectively' assess students resulting in students gaining higher or lower indicators and are poorly placed. Teachers are then meant to show progression by getting students through at least one ACSF indicator per 200 hours. However, where is the VALIDITY in this form of assessing? There is far too much subjectivity involved. The so-called verification process is supposed to be able to help ensure there is validity and reliability of assessment tools and use of them but this is not happening. It is far too easy to exploit. The ACSF may appear on paper as something of value to measure KPIs and to justify continual funding. However, the amount of money, time and effort to keep this program going has come at the cost of creating and implementing an excellent TESOL curriculum with appropriate course material and assessment for the AMEP and SEE.

Appendix 6: The effect of the ACSF on teaching

The purpose of compliance requirements in any system is to ensure and enhance the quality of the system itself. Irrespective of its role in ensuring compliance, assessment in education should support teaching and learning. The ACTA survey included this question (Q74): “*In your professional opinion, how has use of the ACSF affected teaching in the AMEP and/or SEE program?*” Responses are shown in Chart 5 and Table 14.

Chart 5: Effect of ACSF on Teaching

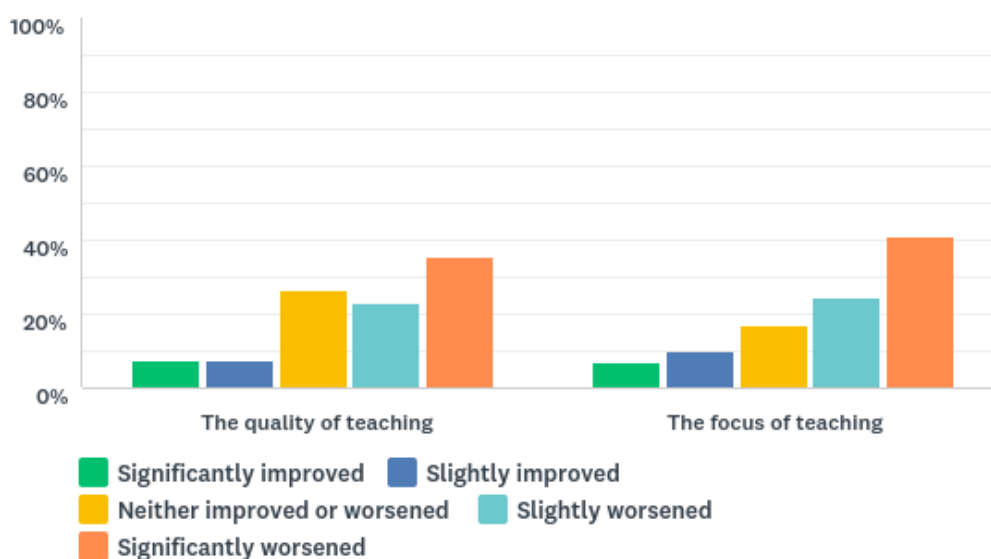


Table 14: Effect of the ACSF on Teaching

Effect of ACSF on:	Significantly improved	Slightly improved	Neither improved or worsened	Slightly worsened	Significantly worsened	Total
The quality of teaching	18	19	67	56	85	245
The focus of teaching	17	25	41	61	101	245
TOTAL						245
Skipped						177

From Table 14 we see that 62 percent of respondents who answered this question (n = 303/490) believed that the ACSF had negatively affected teaching, while 16 percent (n = 79/490) believed it had contributed improvements and 22 percent (108/490) saw no effect.

The complete set of comments accompanying these responses is as follows.

Comments

1. Too much assessment gets in the way of quality teaching.
2. Too much teacher and student time taken up in assessing and recording.

3. Quality is compromised as teachers give the rest of the class "busy work" while doing ACSF with individuals; focus has shifted from teaching and learning English that meets student needs and can be used in daily life to preparing students for ACSF assessments in public and personal contexts that may be broader than the focus of the teaching and learning and pushing students to gain a level when really they need more opportunities for review and language consolidation before attempting a higher, more demanding assessment task.
4. Only when it comes to progressive assessments. I like it as a placement tool.
5. Too much time spent on compliance and not enough time left for the 'nuts and bolts' of learning English.
6. As I mentioned earlier, we don't focus on one skill at a time as before. Now we will try to do different skills so that we can cover different range and contexts in the ACSF. We scratch the surface ONLY. Students have little time to consolidate 1 essential skill.
7. The trouble is we are so busy assessing and administering we often have to ignore students or cut corners or not teach as much or as well as we would like or rely on volunteers to do more than they really should.
8. It has just stressed out students and staff.
9. The assessment tasks based on ACSF should be matched with high quality curriculum developed, moderated, validated and trialled across the provider. This would allow the teacher to focus on teaching and addressing students' needs rather than creating and modifying tasks at the same time of the program delivery.
10. Teachers (sorry, trainers) spend all their time training students to pass the assessment tasks, and dealing with the accompanying paper work instead of preparing interesting and relevant lessons as they once did.
11. The focus has switched from learning to meeting KPI obligations and subjecting students to an over-supply of assessments in which there is very little significant learning. The ACSF is the biggest waste of time and money imaginable.
12. It has taken time away from delivering what is most needed and has taken time away from materials and lesson development
13. I've always used the ACSF in the SEE Program. It provides a useful focus in general, but there's been no curriculum so we teachers have had to create our own curriculum and resources.
14. The amount of time required to assess the wide range of ACSF outcomes required by students in each class significantly detracts from teaching and learning time
15. The onerous paperwork involved in reporting against the ACSF has detracted from the art of authentic teaching and creativity
16. Mostly worsened the quality and focus of teaching by way of increasing workload to the point where teachers do not have the time to plan and develop useful, relevant classes based on known student needs.
17. THE ACSF CLEARLY INFORMS AREAS OF NEED AND ALLOWS FOR TARGETTED ENROLMENT IN CURRICULUM UNITS TO SUPPORT TEACHING AND TO ADDRESS INDIVIDUAL STUDENT NEEDS
18. The ACSF does not fit the needs of AMEP students so it is difficult to manage, particularly the requirement for individual assessments which takes the teacher away from the classroom, steals our preparation time and stresses everybody totally.
19. Rubbish waste of time Progress not recognised anywhere Evidence so easily fudged and very subjective
20. Not appropriate for classroom teaching. Designed for one-on-one teaching in the workplace.
21. It chews up time. Dedicated teachers are doing a lot of extra work hours, to get adminstrivia done. Some teachers seem to be relying more on textbook style materials, not taking the time to create/modify learning materials for their existing cohort.
22. There is less teaching of grammar and language.
23. I haven't been teaching long but I am amazed at the time needed to complete assessments, but also the time required out of the classroom to ensure all the paperwork has been completed. It seems so repetitive and unnecessary. And then....to print it all out for each student.....how many trees is that in a day? It could be a lot better organized and arranged
24. It is the madness of having the CSL and the ACSF in operation at once.

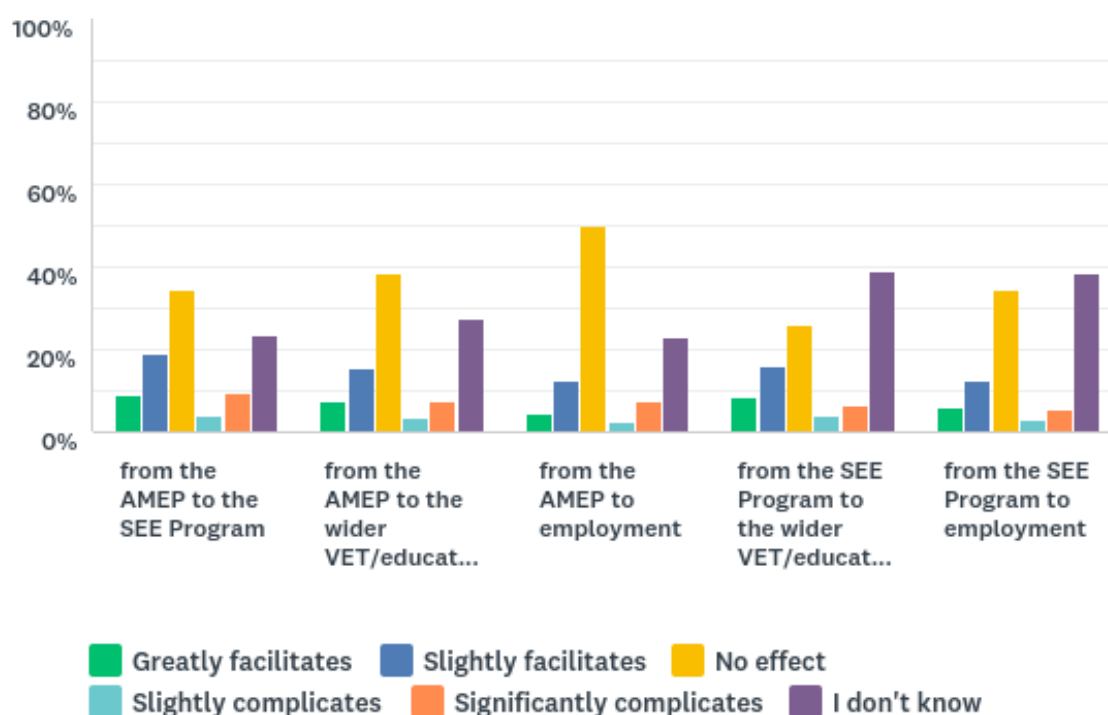
25. Teachers are overwhelmed with the requirements of the ACSF and frustrated with the complexity required. The writing up of coversheets and annotation of tasks is so time-consuming. It reduced the amount of time teachers have to prepare authentic and interesting lessons to meet student needs. The teachers are stressed and exhausted and so have no time to take students on excursions or create interesting shared activities. They are committed to assessing the CSWE and now they have to prepare for ACSF as well. This over-assesses the students and reduces the amount of time the teacher has face to face in class, interacting and meeting needs.
26. It is a gross waste of time and resources in the AMEP program.
27. Takes up too much time when we could be teaching per se.
28. I feel that too much emphasis is now put on ACSF testing i.e. teaching to the test, and not enough on the language that learners need. But that's not all the fault of the contract - it's also what has been selected by our college to meet the needs of the contract. And there is a reduction now, I know, so perhaps things are getting better. We have just changed to a new certificate, so maybe that is why I feel I have never given less value to learners in my whole career. I started with the AMEP (well it was AMES then) in 1981. So I'm part of a cohort that remembers the 'good old days'. Younger, newer, teachers don't seem as disgruntled as we are ... (but then they are not permanent, so of course less likely to show they are disgruntled). I must emphasise it's not 'extra work' that makes me unhappy, it's the feeling that students are not getting such a good deal...
29. I've had to work harder to keep the quality. The focus: I've developed new materials for the new syllabus with my team and I'll always work to make it interesting but some people use the ACSF outcomes as the driver when it's the domains that should be. And then you work backwards from the task, even so we are still stuck with workplace stuff that is not really settlement oriented.
30. Assessment demands take away from much needed time to prepare teaching tools and resources and to discuss curriculum and teaching with our colleagues.
31. Assessments and outcomes have dominated delivery time - face to face - and after (nonteaching time).
32. There's less time & focus to teach. It's all about the end result but garbage in, garbage out!
33. Double assessment
34. The time taken by teachers to do the ACSF process, would be better used by teachers to prepare lessons and focus on student needs.
35. I think the ACSF has forced teachers to take a more student-centred approach, which can only be a good thing
36. It is like putting a square peg in a round hole!!
37. There is a constant struggle to meet the requirements of ACSF and deliver to the CSWE at the same time. It is not that the ACSF is a bad thing, it's just that it doesn't fit with CSWE. For example, having students touching down throughout a term makes it very hard to implement a teaching program for the term. Instead, we have to find creative ways to make sure students have done assessments for the ACSF while also working within CSWE. It is extremely difficult to do, involving a lot of administrative time (unpaid, of course!) tracking who is where and when. It tends to force teachers to be highly reactive and plan day by day instead of standing back and looking at a program of work.
38. Teachers have no time to prepare excellent student centred lessons as they are focussed on who will hit a trigger for a report and finding a task that will meet audit requirements. As students in a straight Level 1 CSWE 1class of 20 may require 20 different indicators (PLB.01 -.08/1.01- 1.08 2.01-2.08 all possible) according to their individual profile, teachers are juggling papers, not pedagogy.
39. We taught with ASCF criteria anyway. The tasks are interesting but they don't add to our programs. We have to consider where we can show an improvement. Writing up is extremely tedious and time consuming so it does detract from teaching quality because we spend all our time writing up these things
40. The focus is on the ACSF.
41. AMEP is now more focused on employment, which is what a lot of AMEP students want - many just want a job. Also, the students are now more knowledgeable and skilled in employment knowledge due to the change in focus to employment. I think this is great! Students are learning English skills through an employment focus.

42. It promotes the OPPOSITE of pedagogical best-practice; it requires lecturers to spend countless hours of their own UNPAID TIME learning how to accommodate the ACSF into their reporting - yet the clients are never made aware of its existence - because it is irrelevant to them.
43. The observational component of ACSF assessment, and the sheer frequency at which assessment is required, takes teachers away from the business of teaching their classes and focusing on learning materials rather than assessment materials. Moreover, the stress that it puts teachers under further reduces their effectiveness in the classroom.
44. It takes time away from teaching and learning- students have differing ACSF indicators.
45. Hard to answer really. It hasn't changed the quality of teaching which in this service has always been high. It has impacted on the time available to produce class specific resources. Teaching has perhaps become slightly more outcomes focused i.e. teach to assessment task as progression requirements dictate. However it is doubtful that this has any positive impact on language learning itself.
46. The paper work is hugely time consuming and does not effectively capture information about the performance of a teacher or institution which is its main purpose.
47. Good for targeting work to individual learners, but can too focused on, taking away some creativity from the classroom.
48. I don't have enough teaching hours which I ignore e.g. I taught FSKNUM08 normally 15 hours over 8 weeks to cover all aspects of the numeracy.
49. Quality of teaching has significantly worsened because the additional duties created by the ACSF and the compliance focus has killed off the time for preparation and creativity in the classroom. The ACSF has resulted in resignations and stress - those teachers still teaching are barely hanging on. The focus of teaching is no longer English and Settlement.
50. Teachers will focus on the students achieving a higher level of ACSF indicator instead of teaching students to master and improve according to the curriculum
51. There is no actual teaching anymore. All of a teacher's time is taken up doing progress assessments because they take hours to do and must be done individually with each student. It is an absurd waste of time. We are unable to assess students for their CSWE Certificates because the ACSF takes all of their hours.
52. They haven't changed what happens in the classroom day to day, just been an extra burden.
53. The addition of extra assessment tasks has removed a significant amount of time and energy from lesson planning and preparation. I work a minimum of 8 hours extra unpaid per week just to try to prepare my lessons and complete paperwork. We have high levels of staff turnover and burnout, and I have never seen my co-teachers look as disheartened as they are now.
54. I have only used ACSF and EAL curriculum so I have no comparison but at times I do just teach towards a task and an assessment so the quality of my teaching wanes just to get the task over with.
55. The amount of admin connected with the ACSF affects the quality of teaching owing to the lack of time remaining for lesson planning and preparation.
56. It takes time away from useful teaching and directs it to futile contractual requirements. In no way enhancing teaching quality.
57. ACSF 3 is too high and unattainable.
58. I believe it has impacted positively by requiring teachers and students to be more aware of skills and how they are transferable across text types. I believe it had raised awareness of the complexity involved in teaching language, literacy and numeracy by requiring people to consider a wide range of performance features rather than limited performance criteria that were not sufficiently broad enough when dealing with a single genre based model of delivery.
59. Too much focus on assessment tasks and not individual learner need teaching
60. Despite the ASCF, sensible experienced teachers keep the focus on what students need. However newer less experienced casual teachers who are desperate to keep their jobs might find it has worsened.
61. Teachers work hard to deliver great programs that include ACSF assessments, we do not teach to meet ACSF requirements.

Appendix 7: The extent to which the ACSF facilitates pathways

The justification given for mandating use of the ACSF in the AMEP is that a common assessment system facilitates pathways into the SEE Program and the wider VET system.⁴⁸ Our survey included the following question (Q66): “To what extent does the ACSF assist client pathways?” Chart 6 and Table 15 document our respondents’ understandings.

**Chart 6: Respondents' Views on the ACSF's Role in Facilitating Pathways
from the AMEP & SEE Program**



⁴⁸ “Use of the ACSF was incorporated into the AMEP's new business model because it provides framework for a assessing clients' English proficiency across multiple curricula and training packages and further aligns AMEP with SEE and other vocational education and training programs.” Letter from the Hon Karen Andrews, MP, Assistant Minister for Vocational Education And Skills, to Dr Michael Michell, President, ACTA, Ref MC18–002892. 2 July, 2018.

Table 15: Respondents' Views on the ACSF's Role in Facilitating Pathways from the AMEP & SEE Program

PATHWAY	The ACSF						TOTAL RESPONSES
	<i>Greatly facilitates</i>	<i>Slightly facilitates</i>	<i>No effect</i>	<i>Slightly complicates</i>	<i>Significantly complicates</i>	<i>I don't know</i>	
from the AMEP to the SEE Program	26	57	102	12	29	70	296
from the AMEP to the wider VET/education system	22	46	113	10	23	82	296
from the AMEP to employment	13	36	146	8	23	70	296
from the SEE Program to the wider VET/education system	24	48	76	11	20	117	296
from the SEE Program to employment	17	38	101	8	17	115	296
TOTAL	102	225	558	49	112	454	1,480
%	6%	15%	37%	3%	7%	30%	100
<i>Skipped</i>							125

Chart 6 and Table 15 show that the largest single group of respondents (37%) believed that use of the ACSF in the AMEP and SEE Program had “no effect” in assisting students into other VET programs or employment. The next largest group did not know (30%). Other respondents were divided between believing it assisted pathways (21%) and that it complicated them (10%).

It would seem from respondents’ comments below that admission of students into other VET programs is determined at the point of entry and that employers use other judgements. Our data indicate that the evidence has yet to be established for using the ACSF in the AMEP and SEE Program. In fact, ACTA seriously doubts whether the ACSF is used in any substantive way in the VET sector and therefore, as is claimed, “provides framework for a assessing clients' English proficiency across multiple curricula and training packages and aligns AMEP with SEE and other vocational education and training programs” (see footnote 48 above). If we are correct, there is no justification for using it in the AMEP and/or SEE Program.

The full range of comments accompanying answers to this question is below.

Comments

1. ACSF is taken again when joining SEE; CSPA is used for entry into other VET courses; ACSF is not used to gain employment by any of my students to my knowledge
2. SEE requires an entry interview for post-AMEP clients so and ACSF scores assessed under AMEP are irrelevant as they do not form part of the PTA, and cannot be considered.
3. What students need is each skill at a time. However, with the ACSF, it seems like we have to stretch all arms over places to cover different skills “to tailor individual needs” - I’m obsessed with this phrase! In the end, I believe students only learn the surface of everything.

4. Why have you restricted this question to progression to the VET courses? (See now how CSWE mind dispositions restrict and pigeon hole people?) Why not progression to a University Preparative Pathway Course or a Foundation Level English course (for 610 hours). Some migrants would be capable of this just as well as fee paying international students.
5. It is not designed to benefit English language learners. They need their own standards and the emphasis should be on teaching not testing. They are there to learn from happy teachers and not to be stressed out doing tests administered by stressed out teachers. The ACSF complicates everything and gets nobody anywhere.
6. I accept that it may help transition to employment or VET programs. However, for learners to move from English classes to VET programs, they have to achieve a functional level of English first. Having an easy transition is meaningless when the existence of the ACSF as a benchmark creates an obstacle to that functionality.
7. I would say that its effect is a mere hindrance or complication - students must waste time completing these time-consuming tasks when they could be advancing their language skills
8. Use of the ACSF is meant to standardize measurement of language ability but because of its complexity and unsuitability for AMEP students I feel it makes students appear less skilled in English than they are.
9. PTAs (initial assessments) are often inaccurate. They often don't reflect clients' current abilities. If this is not identified and rectified early enough, it can delay their progress.
10. The majority of our students are low level learners with some if any prior education background in this situation pathways are irrelevant for at least a couple of years as they try to negotiate learning English. Let the focus be on giving them the language and skills to develop rather than trying to align them with an L1 assessment system - it is not appropriate at this stage.
11. My students are still being told by Student Services that they should get CSWE III to enter mainstream Cert III or IV courses (which is no longer correct) but with CSL they don't have that chance. They just get assessed according to ACSF but then that doesn't even count because everything is based on doing a BKSB test, which doesn't even assess speaking or listening skills
12. ACSF is useful for BKSB, but I think it is what you teach and how you teach it that influences student outcomes, rather than ACSF.
13. THE ACSF PROVIDES A COMMON LANGUAGE TO SUPPORT TRANSITION TO THE WIDER EDUCATION AND VET SYSTEM.
14. Trying to squeeze language programs into training packages is totally counter-productive.
15. The AMEP is about settlement and base language skills, while ACSF is about focussing on getting people employed, regardless of how settled they are. I believe 1st-time ACSF students should be offered a settlement program somewhat similar to the AMEP students.
16. ACSF is a WASTE of time and energy and does not improve learner outcomes.
17. This is just a reporting system as far as I am concerned. Something that is on an official piece of paper that we need to tick that has little to do with what students need. Totally unsuitable for a whole class situation. TAFE needs specific language programs and appropriate funding for pathways.
18. The CSWE should be aligned to the ACSF so that teachers can inform students of future pathways to further education. ACSF is a framework and literacy based and is NOT suitable to teach a language.
19. I don't know how it might improve anything as we don't give learners an ACSF certificate as far as I know... Currently I can't see on any website where tertiary institutions are using ACSF indicators as a pre-requisite or guideline for entry to courses, including RTOs.
20. Contrary to documentation blurb employers here and students don't know the significance of the ACSF or understand it. Talking about PLB.03 with both groups just sends them to sleep. It's just a case of we have this assessment to do, sit here and I'll ask you some questions. For what? There's no certificate, no record that means anything to the student - PLA or ACSF1. The only thing they are aware of is that if they improve they then might be promoted to the next level where work is more challenging.
21. I don't know. Nothing is obvious.

22. I am friends with an AMEP teacher and understand how it is incorporated into their progress tests. By using the ACSF in SEE and AMEP there is a common frame of reference which allows RTOs to understand what level the student is at so this is very useful.
23. If students want to enter another course at TAFE their English is tested anyway.
24. I do not see any benefit in the ACSF to the students.
25. It is no greater measure than a VET qual.
26. Our local TAFE re-evaluates the students' ACSF at entry. Our judgements have no bearing. The new CSWE will make progression to TAFE harder as few students will be able to achieve Cert 3 with the higher ISLPR.
27. If a student is not seen to improve they may lose their place in the SEE program. A lot of the SEE students don't really improve enough to increase their ACSF score but they are improving slowly, so it is all manipulated.
28. I was recently informed by management that it doesn't assist or guide students. It's therefore inconsequential. However, creates an increased workload, stress and frustration and is the focal point of our preparation, delivery and assessing. I have spoken with teachers from mainstream TAFE and the framework isn't referred to at all for native speakers or ESL learners. It was originally developed to assess literacy levels in students enrolling for trade courses at TAFE!? It's merely a funding requirement (?)
29. I understand that we can use a students' ACSF level as an easy way to demonstrate their readiness to pursue further studies in different fields. But I don't see that it is essential to a teacher being able to see that a student is ready for further study, at which point they could have their skills assessed to see what they still need to work on before pursuing that study.
30. The ACSF gives teachers a tool for interpreting entry and language requirement levels for student pathways to other training. However as there is no obligation for students to follow language teacher advice on their readiness for other study, it fails to have much impact. In addition other vocational courses and providers continue to admit students to a range of courses beyond their ACSF level which results in failure and ineffective use of English language learning opportunities. Many clients are understandably driven by a wish to progress to work and vocational training and move away from English only learning long before their ACSF level would suggest appropriate. Perhaps if the AMEP programs facilitated easier implementation of vocational plus English training programs it may maximise the benefit of the ACSF tool.
31. The ACSF just wastes a lot of teachers' time which could be spent on preparing classes and catering to their students' needs.
32. The ACSF is a solid tool to gain a good understanding of skills. However the work that the student does in their vocational training has more weight to their employment pathways journey.
33. The ACSF has no effect other than creating a greater workload. The wider community and employers have no idea what it is. The policy at our TAFE is that if our AMEP students don't have PLB on completion of their AMEP hours across all skills they are not allowed to enter SEE. How can students with NYA across the board get to PLB across the board within their AMEP hours? They can't, so that means that from the time of their initial assessment it is known that they have not further pathway into SEE - how demoralising!!
34. Is it possible to omit the use of ACSF? It has just added too much to the workload.
35. Sorry no idea.
36. Outside some limited programs, no-one understands what it means - even other VET lecturers.
37. It is unrelated.
38. I teach mainly Course level and Cert I, so I don't think the ACSF makes a difference as such.
39. Employers and VET providers have no understanding of the ACSF, so it doesn't help our students.
40. ACSF It is irrelevant to anything outside of monitoring its own jurisdiction. It is closed system irrelevant to practical work or life in general.
41. ACSF does not assist in anyway in WA

42. The ACSF is not a reliable tool. It is too subjective. It is not understood in the wider community so of no use to most employers. It does not give a good indication of proficiency levels.
43. The ACSF does not seem to make any difference in applying for a TAFE course or job. It complicates class makeup for administrators in that you may have people with different ACSF levels in the class. They want everyone to have the same ACSF but if you are forced to progress them of course they are going to keep on having a higher and higher ACSF level with few real skills.

Appendix 8: Comments on unpaid hours

1. If this means having to complete administration duties and then prepare for lessons then 9-16 hours is accurate.
2. approx. 5 hours a week = 50 hours
3. Worked at least 9 to 10 hours per day, as I was working on creating class reports, and training plans for the workgroup.
4. We are given extra leave entitlements to make up for the fact that we do extra work in term time. This is a very subjective question as not all the teachers understand why they have extra leave entitlements. [This respondent reported working no unpaid hours per week].
5. It is difficult to actually give even an average amount of time as ... [phrase deleted to protect identity], I have not only lecturer and enrolments and all admin responsibilities but also I'm the person that students come to for help as there is no external assistance to help them navigate their new surroundings. I often get texts and emails asking for assistance or guidance. I also feel that the initial interviews take longer than the 3 hours payment allocated for each student. [This respondent reported working an average of 9-16 unpaid hours per week].
6. I get paid only for 5 hours per day teaching time only. However, I work another 5 hours every day I work just to keep up with the admin, preparation and all the paperwork required. So get paid for 10 hours per week and work at least 20 but often more. I choose to only work 2 days because there is so much extra work, I wouldn't be able to keep up with it all if I taught more hours.
7. Especially after assessments because of all the different methods of having to record each assessment. [This respondent reported working an average of 9-16 unpaid hours per week].
8. 1-4 hours plus a few excursions.
9. Always went above and beyond because AMEP students deserve the very best. I would always come in at least one full day unpaid when part time and often stayed from 7:30am to 10pm and spent ages marking over the weekend. This would not have been necessary if the admin we had to do was not so ridiculous.
10. I typically work a full week of unpaid hours in the holiday period in order to catch up on onerous and an excessive amount of administrative duties - daily I typically work and additional 3-4 hours.
11. I tend to come in on days off (non-attendance time) after the end of term to catch up on paperwork that I couldn't get done during the term
12. There's been a lot of paperwork to complete in this year. [This respondent reported working an average of 5-8 unpaid hours per week].
13. IT ALL BALANCES OUT IN TEACHING. SOME WEEKS MORE HOURS OTHERS NOT. I AM HAPPY WITH THE WORKLOAD AND HOURS I WORK.
14. I have examples of the majority full time teachers around me unable to withstand the workload. [This respondent reported working an average of 9-16 unpaid hours per week].
15. I am paid for 1.5 hours to write a PTA report but the whole process takes longer.
16. There is always the need to work overtime with assessment and preparing for classes. The toll on mental health should also be taken into consideration as the undone work keeps nagging in a corner of your head and makes you feel bad. [This respondent reported working an average of 1-4 unpaid hours per week].
17. 17-24 hrs at least. The assessments and all the paper work takes forever.
18. 5-8 hours but hard to measure, but as I tend to do most of my work on site I generally work 8.15 - 6.30pm each day.
19. In addition to class and assessment tasks I designed a major project ... [identifying details deleted]. I did this unpaid this term. It was days of work. It was used to promote our programme. [This respondent reported working an average of 9-16 unpaid hours per week].
20. It varies... also earlier this year I had to upgrade my Cert IV and that took many many hours of unpaid study. [This respondent reported working an average of 1-4unpaid hours per week].

21. I may have worked more because I check my emails every day and respond to them. I also do marking at home. [This respondent reported working an average of 1-4 unpaid hours per week].
22. Again, this [i.e. more than 24 hours] is not sustainable. [This respondent reported working more than 40 paid hours per week over the previous 10 weeks.]
23. Compliance has become onerous. It is ridiculous the amount of time is spent on it as well as teaching to requirements of ACSF. [This respondent reported working an average of 5-8 unpaid hours per week].
24. I was working 7 days a week even though only getting paid for 10hrs. Most nights as well. An almost impossible work load.
25. The admin load for the SEE program is extremely onerous. It requires more than 1 hour of unpaid work per hour of paid work.
26. I get paid 1.5 hrs to do a PTA. It takes 2.5-3 hours sometimes even longer if it is a complicated assessment or I have to liaise with outside organisations.
27. 10 hours every week.
28. Massive change in the administrative tasks required compared to the previous contract. [This respondent reported working an average of 9-16 unpaid hours per week].
29. Too much! [This respondent reported working an average of 9-16 unpaid hours per week].
30. Due to the OUTRAGEOUS requirements of ACSF reporting [This respondent reported working an average of more than 24 unpaid hours per week].
31. Around 10 12 hours / week
32. I do a minimum of 1.5 hours out of class for every in class hour.
33. 3 + 12 = 15-ish
34. Since the new contract, my weekends and my evenings at home are now nothing but work. My relationship, my domestic duties my friendships are all suffering. [This respondent reported working an average of 17-24 unpaid hours per week].
35. This is why private RTO's should not deliver the AMEP. [This respondent reported working an average of 9-16 unpaid hours per week].
36. I refuse to take excessive amounts of work home, but unfortunately that has meant that under the new contract that it is impossible to meet all of the work requirements of teachers. The excessive amount of report writing that goes with assessments is just not doable, especially in a multilevel, multi funded classroom where students are not doing the same assessments. We have rolling intakes, and such a variety of learners that all non-teaching time is consumed with preparation for class as we are preparing lesson plans x3 or 4 for each class x3 sessions per day. We cannot follow any one book and the ridiculous decision to put SEE and AMEP together using the same assessments has been a nightmare. All SEE materials were written for native speakers and often assume cultural information. The idea that we can contextualise for each student is academic arrogance - no teacher on the front line has time to contextualise for each, nor should it be necessary. As a teaching group we were conned into teaching longer hours on the agreement that we would have more admin support. The only problem was that under the new contract our teaching and assessment duties actually increase exponentially and because of our agreement we then had less time to do more work. The contract was costed to win not to deliver and the cost to front line teachers has been disgraceful. All the talk about work life balance and wellness etc is just hot air, my colleagues have been dropping like flies. In my 8 years at TAFE working under the last 3 contracts this has been the worst I have ever experienced. I only wish I could do something else in this regional area, I would leave in a heartbeat.
37. Higher in peak times....average 5-8 in normal week.
38. This does vary enormously, but the preparation and marking is easily double the actual hours in the classroom. Easily.
39. All record keeping/data entry, creating tasks for assessments are unpaid hours. On top of that photocopying assessment tasks for closing of units and validation takes a lot of time which is unpaid too. [This respondent reported working an average of 9-16 unpaid hours per week].
40. To do all the paperwork + create assessments from scratch + hours of validation + marking + lesson prep I cannot fit all these things in the hours I am given on top of my teaching hours. I have a logbook

(advised by my accountant), so I could claim my computer and Internet use on tax. Last week I worked over 12 hrs (I mean from home). The weeks before - around 15-17 hours.

41. Although on my teaching days I start at 07.30 and finish at 16.00 (with 6 hours of teaching both days), I do not have time to prepare my lessons or to complete all basic administrative duties required with the new contract, such as reporting. [This respondent reported working an average of 5-8 unpaid hours per week].
42. On my teaching days, I work from 07.30 until 16.00, and still do not have time to do any reports or to complete all additional administrative requirements, such as preparing for audits and a quality review. [This respondent reported working an average of 5-8 unpaid hours per week].
43. With the increase in admin, class sizes and volume of emails, preparation is pushed into volunteer hours. [This respondent reported working an average of 9-16 unpaid hours per week].

Appendix 9: Well-being since 1st July 2017

1. I have only been employed since May 2018. Since then I have noticed a slight improvement. I felt morale was low earlier in the Year.
2. Gaining permanency has really helped.
3. For two years, I would say my feelings about my work would include the words despair, frustration and emotional distress.
4. Frustration and need to fight for rights, and focus on being strategic politically, has meant that I have been fighting rather than giving up. I have also tried to encourage colleagues to find ways to stay resilient and to find positives even when we were being faced with multiple difficulties.
5. I was frustrated, stressed and at one stage, I had panic attacks, and had to see a doctor and took a week days off work on different occasions.
6. Clumsiness and ignorance about AQF frameworks for RPL, and the qualifications already held as a registered teacher by TAFE overseers has led to insult. They literally do not know what they don't know. I would not apply for a TAFE job now after my up close observations - lucky for me I have work in the school sector and demand in the university sector with a similar cashed up fee paying international student cohort. It's TAFE'S loss and the migrant students themselves.
7. I do not know anyone who is satisfied with their work in the AMEP.
8. My ex-colleagues are exhausted and get little encouragement and support.
9. During the time I was at Max Solutions, I was consistently overworked, over-harassed and did not feel good about being at work. I spent my weekends recovering so that I could be ready for Monday again, and was beginning to rely on food and alcohol to cope with the stress. Several colleagues dropped down to a 0.8 load in order to cope, but as I am the breadwinner for a family of 4, I didn't have this luxury. I found it appalling that I essentially had to choose between a reduced income and retaining my mental health, or a full-time income and complete and total burnout.
10. I am constantly stressed. The workload is excessive, unmanageable and cries for help fall on deaf ears. It is embarrassing to have to give constantly changing instructions to students about their course. The students leave because they are dissatisfied and they feel that they are wasting their time. They might ring up with an excuse about dropping out because they have found a job or are moving interstate. I am sure most of them have done neither.
11. It's gone up and down. I've noticed many workmates being more stressed than previously. Lack of job security has affected some of my colleagues greatly and team morale.
12. I'm just too busy to get everything done as well as I would like in spite of putting extra hours in. The constant changes are very frustrating as you have to do the same thing again
13. No time for exercise any more.
14. Too much stress at work with TAE and new curriculum demands 12/17/2018 2:47 PM
15. Very stressed. 12/17/2018 1:19 PM
16. I am the union rep, so I try to focus on solutions. Personally, I keep very fit so I maintain my energy level and endorphins. I am determined to work very hard at never taking my frustrations out on students. But even so, it's exhausting and frustrating and sometimes I despair that we are on a downward spiral and this long-term, successful and much-loved program is being destroyed by the philistines and their apologists
17. My time has been taken away from student focus and resource development to ACSF requirements
18. I've had to learn to say no and really be mindful of how I'm using my time. I generally consider myself as a very good time manager but now I have less time for other people, and am less sympathetic if they can't/won't pull their weight.
19. My mental health has suffered. I mourned the loss of AMES where I was working. I tried to get on with things at Melb Poly but it has been so dysfunctional and it has been difficult to feel good about anything to do with it, except for the lovely students themselves and the rapport we have built despite all the dysfunction and lack of staff support. It has been soul destroying to work for an institution that delivers the program with such a lack of integrity.

20. I feel tired all of the time and unwell
21. I am learning ...
22. No. There have been no changes, except for the introduction of a small staff lunch room that is like grand central station. The admin task requirements have been increased and no extra admin support staff have been employed. Information is not passed on through a formal process, but through the grapevine and if you are lucky, you hear about it.
23. Reasons being ACSFs, overload of paperwork for assessments to meet audit requirements, lack of admin support so that we are asked to do a lot of admin such as student withdrawal paperwork, transfers
24. The stress that came with the changes in July 2017 was utterly overwhelming. I became very sick in 2018 and then needed to see a psychologist regularly to keep my job. The changes were ridiculously burdensome and not necessary for this client group.
25. I have always taught in the classroom before. Teaching online is different, but rewarding in its own way because we can better deal with students' individual needs .
26. Very stressed, very overworked, spend a lot of time at home doing work, have felt unwell because of all the demands and stressful environment.
27. Suffering from fatigue, vertigo and lack of life work balance.
28. Can't really say as new to TAFE but I've been told there are teachers on stress leave, which is why I got employed casually. Other teachers don't understand 'the system' and complain on a daily basis.
29. I now have permanency for 2 days per week. Previously I was casual.
30. Until I moved to TAFE
31. Changing of work place from Navitas to NSW TAFE has significantly improved my well-being at work.
32. There was a very unpleasant recruitment process that happened last year. Positions were advertised in late Dec and applications had to be submitted by early January. Managers did not inform staff. Recruitment was solely based on the application and not previous work history. This is a significant disincentive to 'go the extra mile at work'.
33. There are many issues students bring to class and it's like 'trying to herd cats'.
34. Expected to do much more in less time
35. While not clinically depressed, I cry more. I feel sick at what I have to do. My husband asks when I will quit, and is glad if I mention an end date. I love this program, and the people I work alongside.
36. I love teaching and the students and my colleagues, even the team manager but I hate the paper work - to meet accountability requirements is completely out of proportion with what we are teaching and assessing, our priorities (as in mixed classes to keep numbers high). I am burning out fast (have been teaching 35 years) but all because of accountability.. I don't think any one cares about my ability to actually teach English .. too much work with continuous enrolment , big and non-homogeneous classes, writing the assessments for CSWE and ACSF and SEE students being thrown into classes they are often unsuited for
37. I feel buried all the time. We have too many masters to answer to: DET, LWA, ASQA. They all seem to demand our all.
38. This is due to TAFE changes as well as AMEP / curriculum changes (general workload)
39. I have felt stressed, negative and have considered resigning and seeking other employment.
40. Questioning how much more box-checking, duplication of data and record management I can tolerate. Missing the creativity of materials development and forward planning of quality and innovative learning experiences
41. Spending too much time on work outside of work hours. Endless compliance activities.
42. I am so stressed. Double enrolments, double assessments, students who are mentally unwell and heavily medicated, it's crazy. I offered my colleagues this role to give me a break and they said they would rather not have a contract and be unemployed than teach SEE. The work load is twice as much as a regular TasTAFE teacher. Also they have less holidays so no prep time as I teach up to 20/12/18 and start on the 14/1/19.

43. I have been taken off class to focus on managing the ACSF because I have the skills to do so but I miss the classroom. No-one else at my workplace has ever considered putting up their hand to take on my position to help part-time
44. Stress and depression have been constant companions since the new contract. When I started, I was a joyful and enthusiastic individual, and I have been all my life until the last year and a half. The work load is not sustainable and the stress is not just about that - it is that the students in my care are forced to focus on constant assessment rather than learning in a stress free environment.
45. My eyesight has got worse due too much computer work, often no weekends because of trying to meet schedules, change of regulars such as swimming time, family time, even personal time for my well-being, missing dental appointments
46. My well-being took a huge dive earlier this year but has now recovered significantly as we have learned to relegate ACSF related activities to a position of necessary but unimportant duties.
47. I can detach myself from the grumbles.
48. This Q is NOT APPLICABLE to me as I am now with a different (and better) non-SEE employer.
49. I've considered resigning a number of times due to stress and sheer exhaustion, but I am hoping this situation will improve soon.
50. Uncertainty over the future
51. I feel quite depressed about my employment situation.

Appendix 10:

Answers to the question “If you have any further comments, questions or concerns about English language provision for adult migrants, please Comment.”

Answered: 116 Skipped: 301

1. It's vital that staff PD include the latest research in areas of relevance for AMEP clients and also draw on students' own literacies. The new CSWE 2108 curriculum is not necessarily popular amongst colleagues but I believe that it is designed to better incorporate digital literacies and the movement of, not only people, but networked people. Many staff at this workplace still rely heavily on paper-based resources and PD should address changing times and research based practice.
2. Before the current contract, our AMEP program was working so well. Teachers and students were happy and outcomes were good. Why on earth did bureaucrats have to meddle with our amazing program?
3. Reduce unnecessary administrative works and spend the time in development and teaching English.
4. The ACSF has had a terrible impact on the program. I have been teaching in the AMEP for nearly 25 years and it has been the worst influence I have seen in this time. It has affected all parts of the program and especially impacted on the quality of the teaching learning program. The obsession and inefficiency of assessment has decreased quality of the teaching program and had a terrible effect on teachers morale.
5. I enjoy teaching ESL students. They are mostly people that want to learn and I feel like I am making a difference. They are able to become part of the community. They become happier and many of my students have gone on to do further study within the TAFE system or have opened restaurants or other businesses. The administration duties however has affected my teaching quality because I don't have the time to spend on my lesson plans like I used to. Real beginner students need the greatest support but in mixed level classes, it is difficult to give them the support they need, so they stop coming. They also need more than one day a week of class but because I have low numbers, I am not allowed to offer any more time. Therefore, often, they are the ones that stay on Centrelink benefits and are unable to get jobs.
6. Please use 1 standard curriculum for the whole program. Create a task bank. Stop using the ACSF. I think I am just sleep talking.
7. I am wary of the fact that little good may come of applying pressure to institutions - the only good that I can see possible would be from the Commonwealth reconsidering the terms of the current contracts. Two things need to change: 1. The ridiculously low rate the institutions are being paid to deliver on the contract 2. The use of the (quite inappropriate) ACSF and overassessment of students. I love teaching, particularly to migrants, and I don't want to see this all fall apart as a result of mismanagement.
8. I want the pain to stop for all concerned as soon as is humanly possible!!!!
9. CSWE curriculum needs to be freely available online like other ACARA curriculums so that students and others can see it. Teachers need the freedom to be pedagogic/androgogic practitioners and teach using resources that suit them as teachers not be dictated to by the assumptions underpinning CSWE;
10. The new contract is not providing the best opportunities for migrants to learn English. Whoever managed the writing of this new contract and its conditions has no real appreciation of the needs of new migrants, and how capably it was being delivered before. Educational values appear to have been sacrificed for cheap delivery.
11. In summary: Stop the tendering and return to fully government run AMEP and improve working conditions for teachers (job security would benefit students and staff). Forget the ACSF for English learning (and probably everything else for that matter). Appreciate the needs of students, staff and volunteers! They need to be nurtured!
12. In a broader sense, I am seriously concerned about the deterioration of language provision to adults in Australia. This is a program that should never have been opened up to commercial interests. This is a vital program and the support of these individuals needs to be done properly and whilst programs should be efficient, this efficiency should not come as a result of substandard education and support. The huge amount of money in tendering and recruiting every 3 years is money that could be spent on outcomes for learners, and it makes me so angry. As mentioned, I am highly trained and experienced, with over 16

years in the classroom and multiple postgraduate qualifications. I'm now essentially lost the teaching profession and not through my choice. Other similarly high-qualified colleagues have scattered to other organisations. Some have gone interstate and others have left teaching. All this valuable and extensive experience and knowledge has walked out the door and I can't see how it will be gotten back.

13. 510 hours provision of English language tuition for migrants and refugees has a great potential but needs to be revised to allow greater input from the teachers on how to address students needs.
14. I am concerned and disheartened for the hundreds of student who are not being afforded the opportunities they should be because their teachers are exhausted and overwhelmed by petty administrative tasks.
15. TAFE and the government need to invest more in educating our migrants. They and their families are a valuable part of our country's future.
16. Feeling burnt out, undervalued, overworked, very sad that the system has come to this :(My passion and creativity has been significantly compromised by all of these changes and I feel for the people we are trying to help. Colleagues' morale is low...who is making all of these decisions? Do they actually understand who we are working with and what their needs are? Obviously not. So disappointing!
17. Please help us salvage what was once a fantastic program from bureaucratisation, over-assessment, administrivia, ASQA and LWA. We are great teachers - we just want to be able to 'teach'!!!
18. I BELIEVE THAT TOO MUCH FUSS IS BEING MADE. SKILLED TEACHERS ARE ABLE TO ADAPT TO CHANGING CONDITIONS WHILST ENSURING QUALITY DELIVERY AND PROFESSIONALISM. WHEN THE STREAMLINED CHANGES ARE INTRODUCED ALL ISSUES OR CONCERNS WILL BE ADDRESSED.
19. I really want to see the end of the ACSF in the AMEP. I want a curriculum that is suitable for adults learning English as they settle in Australia. There should be enough money to adequately resource such a useful program. Transition to employment and language and systems support for this is somewhat appropriate for those students who have acquired enough English. I would like to see highly qualified and experience teachers treated with respect, and allowed autonomy and good working conditions.
20. Please help us get our professional teaching time back.
21. The program is broad but clients expect more structure
22. It's very critical that changes be done or the program will go downhill.
23. We need a national ESL curriculum that all providers use for ESL learners, and TAFE needs to be funded adequately to provide quality education.
24. Thank you so much for advocating for us and for the quality of adult migrant education. 12/15/2018 12:00 AM
25. The AMEP is a great program but could be improved. It's critical to go back to ISLPR which actually measures additional language acquisition. It also needs to be supported by more opportunities for employment focussed training once students have reached functional English and this training needs to offer work placements and on-going mentoring.
26. I'm an ESL teacher and I feel for most part of my job I'm not doing this now.
27. There needs to be a program established at an RTO for older students and care givers who will never go out to work, but who would be happy to attend regular English classes for social and well-being purposes. This type of student has been neglected and are falling through the cracks. They cannot spend 4-5 years or more in a Preliminary or Certificate 1 level, or be expected to attend a class once a week or on a non-regular basis at a volunteer organisation. They deserve quality English education delivered by properly qualified teachers.
28. Provision in regional areas patchy Some students want face to face and are not interested in online/distance delivery if an available alternative.
29. No one admits this, but cheating, shortcutting, copying off others and lying have become part of what we do to survive as teachers and protect our students. I could make an extensive list of the documents we have to sign and fill out which involve untruths. More faith in teachers, halve the paperwork. PLEASE!
30. Where's the settlement in the AMEP? CSWE was the mandated curriculum for the AMEP. Could an academic/expert be asked to look at CSL (and other non-CSWE curricula) - is it appropriate as a linguistic/TESOL framework? Request for guidance, how we can work together to have changes for the

next AMEP tender. Educators support the notion of “ACSF in the AMEP must die”. ACSF requires over reporting and assessment

31. Is the general consensus amongst teachers who used CSWE that it was a good curriculum for students and teachers alike?
32. Insisting on students with very low levels of literacy and numeracy to explain their absences in order to legitimately reclaim hours for non-attendance disadvantages this group.
33. I would like to return to the ISLPR. Also, more administrative support.
34. It is an extremely important program that has proven results. Let the educators educate and provide the appropriate support so that we can make interesting and relevant lessons for our students.
35. The AMEP program is a really important and highly beneficial to new Australians. It makes a significant difference to people's lives and can dramatically contribute to a happy and productive Australian society. However, in this form it is destructive and pointless. I don't know how much these changes have cost, but it is a waste of valuable resources measuring minute details through the ACSF.
36. I think there needs to be more marketing to encourage migrants to TAFE. I think we need a dedicated admin person calling past students to return to classes next term/year.
37. Too much paperwork, overly-demanding audit requirements, drop in teaching standards. 12/11/2018 1:54 PM
38. The initial and progressive assessments for AMEP have become dysfunctional black holes which suck in thousands of hours of work with very little to show for them. They have become so onerous and over complicated that most staff fudge the results just to get them done. I believe that it is the law of diminishing returns, i.e. the more complex you make something, the less likely people are to do it properly. IELTS is a far superior form of assessment and would be a much better and probably cheaper option. The current assessments are not providing true data about student competency and are therefore useless. The AMEP is probably the most inefficient and dysfunctional organization that I have ever come across and needs to be totally overhauled.
39. Thanks so much for giving us the chance to participate. 12/9/2018 10:33 PM
40. Yes. The focus is on reporting and ticking boxes. It would be more productive to focus on curriculum content and what is happening in the classroom. The KPIs are superficial and largely unhelpful to teachers.
41. Adult migrants need a lot of attention (for social and linguistic reasons) Taking teachers away from these primary concerns by monopolising their time with bureaucratic and compliance matters takes away from what our students need. They need teachers who are mentally present, who are not overly stressed, who don't have enough time to prepare lessons or teach them properly because they are so tired from doing all the assessment requirements or haven't had time to devote enough time to matters that the students are needing them to be involved in.
42. The AMEP has been a quality program for many years. I hope that quality doesn't get reduced by having a lower qualification requirements or reducing the funding.
43. Keep for-profits out of the AMEP. When a company is listed on the stock exchange, the focus shifts from students to making a profit. The ACSF is developed for students who speak English as a first language, not as a second, and therefore is NOT relevant in the AMEP context. Settlement topics are important but are no longer taught because the focus is only on ACSF requirements. There are still Navitas classes in Canberra that have NO access to iPads, laptops of reliable wifi, exacerbating disadvantage.
44. Students get given so much paperwork & so much photocopying required by teachers. Wouldn't a student book be in everyone's best interest?
45. The program in the current state is totally unacceptable.
46. Due to compliance, ASCF and the new CSL curriculum, the system is now process focused and not student focused.
47. I think the elimination of the AMEP Counselling Service was a big mistake. Teachers have to manage much of the pathways and welfare work with little time due to the demands of the ACSF.
48. It's a very satisfying role and one I intend to pursue further, but the limited funds and resources do make it challenging.

49. Procedures and paperwork have to be streamlined for optimum results.
50. It would be nice to have more conversations about how to be a better teacher rather than KPIs and focus on assessments. Also it would be good to have prep time for teaching rather than time just for completing administrative tasks and writing up assessments.
51. I am concerned about the migrants missing out on AMEP as the settlement program for people who are new to the country and need to make a huge adjustment both culture-wise and language-wise. They are bombarded with the insane amount of assessments instead of being taught what they really need to be active participants of their new country.
52. I am much happier now at TAFE. However, the ACSF has really added so much to our workload and I think there are much better ways to assess our clients. The ASCF is not for new migrants and refugees from a non-English speaking background. Why can't we just use the CSWE for teaching and assessing? There is just too much a teacher in the AMEP is expected to do now. The quality of teaching is plummeting.
53. The assessment requirements take a huge amount of time and greatly detract from the time I have available to plan and prepare my lessons. They also eat up valuable class time with the students. I have to spend an inordinate amount of time to complete the assessments for a class of 26 students, each requiring a number of individual assessments to be administered and written up each term. I am paid at a casual rate, so I do not receive any pay for the many hours of work that this requires.
54. More and more assessments are given to AMEP students for the purpose of meeting the contract requirements but not for students' learning progresses.
55. Changing providers mid-year is most unprofessional. Also the poor payment of teachers and their lack of good conditions is a major concern considering many have Master's and PhD's in TESOL. Is it any wonder they leave?
56. Interesting to see that our workplace is not the only one experiencing unsatisfactory work place conditions and that something is being done to address it!
57. Inappropriate referrals, e.g. referring people with ongoing health issues sets them up for failure and may prevent them accessing the program at a later date when their health has stabilised. Referrals seem to come in from providers with no regard to the best interests of the client or maximising their educational opportunities.
58. I believe the AMEP programme is extremely important and in fact would love to teach this at our local TAFE but I am not qualified enough. It is important that all migrants attend this and reach at least an intermediate level of English so they can work, integrate and enjoy life here.
59. The biggest problem is the workload caused by ASCF progressive assessments which are purely for auditing purposes. It's a complete waste of time and doesn't inform teaching. It takes away from good teaching.
60. As I said earlier, DET has obviously given contracts to providers that have lowered their asking price. This has meant quality providers have compromised on their ability to deliver good quality programs to AMEP/SEE students. Classes have to be large to remain viable otherwise providers operate at a loss. Extra compliance, i.e. ACSF, gives nothing to the student. It demonstrates very little to DET as teachers are not assessing with the same integrity they would with ASQA compliant curriculum tasks. I think DET has a lot to answer for in exploiting providers by not paying them enough to resource institutions to resource their teams to deliver quality services.
61. We need to go back to a needs based and grammar based program with less focus on assessments. The outcomes for our students were better when we had that program. Now all that seems to matter is KPIs and money.
62. I would really like to see an academic analysis or comparison of CEFR, ACSF, ISLPR as a measuring tool of subsequent language acquisition. Could ACTA support this? Tender conditions which mean providers who tender require 20 (average attendance) in class and DET not paying for students who are out of class is unreasonable when facilities, teaching and admin staff are still required whether they are there or not. Continuous enrolment because one student leaves so the class must be topped up, even in the last week of a term (!), is difficult to manage pedagogically: the whole class had learned about places in

the town and had practised directions and were listening to some instructions; the brand new arrival in the room felt overwhelmed and the teacher had to quickly modify the entire lesson for that student. ACTA suggested more than 3 years ago to the DET that providers should be paid till students withdraw and that students should be able to take e.g. 2-4 weeks leave per year from their program for settlement and sick and personal leave without affecting their 510 hours. DET should also seriously consider the expectations on low educated low literacy students to complete AMEP within 510 hours. This measure should only apply to learners from CSWE 1.

63. Assessment system is too complicated and confusing for new trainers. Insufficient mentors are available.
64. There was a time I spent my time thinking about how I could meet my students' needs and designing lessons and term plans to do just that. Now I spend my time marking rolls, following up on absences (and don't forget to get acceptable evidence!), creating new assessments that satisfy audit, writing (and in many cases rewriting or even just plain fabricating) assessment reports that satisfy audit, guessing what auditors will be looking for and trying to defend my professional judgement, oh, and don't forget all the ASQA requirements that we have to try to fit into with JP witness documentation. Where have teaching and learning gone? They are squeezed in between all the above. And I feel the pressure on all sides.
65. Bring back the old AMEP program.
66. Having tutored with both TAFE and RTO, the delivery of the course and the method of delivery is far superior in TAFE and much more "hands on" approach. Also class sizes are smaller and in the appropriate learning environment and not converted offices.
67. I feel the Government regulations imposed on the program are racist, promote workforce development and do not promote or consider settlement issues, learner needs or support and help in language acquisition and re-settlement. I also feel that staff are dispensable and are not valued or supported. Our manager ... [name deleted] commented that "they have had it easy for too long", which is incorrect, demoralising and disrespectful and is further demonstrated in the management of the program, treatment of staff and focus on the ACSF.
68. Please ensure that the pressure on refugees to survive financially and to give evidence that they are looking for work is removed so that they can focus on their task of developing their English skills and can feel a sense of belonging in our community.
69. The AMEP is a wonderful service. Do not let the ACSF, accountants, politicians and other assorted 'stakeholders' ruin it.
70. We used to be a settlement service, designed to help new arrivals to settle into the community. TAFE was a fun place to work, and there was a positive feeling of contributing to the community and the students. That has been stripped away under the new contract, and many of us aren't sure how to get that job satisfaction back.
71. Learning should be settlement based and inclusion. ACSF should not be given too much focus.
72. It seems to me there is a large gap in appropriate programs and access to workplace English plus vocational skills programs for learners post settlement. Past students often return having used AMEP funding and years down the track are seeking to move from low skilled labour but do not have the language skills particularly in reading writing for vocational programs. This appears to apply particularly for women who have had numbers of children during their early settlement and AMEP entitlements have been used in a fragmented way. It is also evident in both women and men who have arrived with little or no formal education in their first language. Men who have trade based skills have great difficulty transferring that to related employment again often to do with practical rather than formal training and English competency to undertake trade education in Australia.
73. I would love to spend more time developing a really great teaching and learning experience for my students but have to deal with endless admin, changes in rules, personnel, procedures, lack of support, bullying. I no longer say I am a teacher. I am an administrator.
74. The auditing system is not effective in capturing information about the quality of teaching in an institution, however it is effective at completely distracting that organisation from achieving quality teaching and into completing all the paper work that is needed. As the ACSF is a failed system for assessing student progress in English there are big problems in this school and in my classes with

students having to be put into the wrong class according to the ACSF rating although it is clearly the wrong class for their English level.

75. 510 hours is not enough time for newly arrived refugees with little previous education and who require childcare.
76. I feel my vocation is being squashed by the weight of bureaucratic demands and tedious administrative tasks. I feel that the student is no longer the focus of my efforts. Pleasing the auditor has become the motivation for most of the workplace buzz; emails, meetings, professional development and general conversation. I am only paid for 32 hours of work but the changes are demanding many more hours of my time. I always felt enthusiastic about my job and happily donated extra hours to plan and prepare lessons and content. Now I resent every extra hour that the electronic rolls, records, assessment reports and other task steal from my personal life.
77. The pressure of the external audit and the pedantic inconsistent auditing (LWA) has taken a toll on me personally. No respect for the professional experience of the assessor who knows the students and has supported them to achieve. Measurement of success is confined to the ACSF audit verification which is additional to TasTAFE audit requirements. It reduces confidence in teaching and assessing ability and to be told that verification relies on colour coding and manual ways for them to easily assess is pathetic. One year portfolios are OK next year they are not. Poor communication by LWA of changes for the endless paperwork. We lose many students to fruit picking as they are directed to go to this by Centrelink so they disappear for 6 months at a time, They come back having lost their skills. They are used as cheap labour and stuck in a never ending rut.
78. It is currently too focused on assessment because there are essentially 2 separate systems - the ACSF and the CSWE. Clients are not taking enough ownership of learning and some feel an overwhelming sense of entitlement. The majority of students are very appreciative of such a program though.
79. The government appears to be inconsiderate of people's (students') personal circumstances and make blanket rules, e.g.. making visa requirements to order people to regional areas when they may have set up their lives and have jobs in their original location.
80. I think this is important work but the emphasis on assessments is causing distress for teachers and changing the relationship between teachers and students as there is no time for excursions or practical activities
81. If the ACSF continues to be used, then it will need to be adapted even more as currently ACSF assessments have no educational benefits for AMEP students who are already enrolled in an accredited curriculum. Also the ACSF has added a huge amount of extra work for teachers and assessors that has to be carried out in the same amount of time as pre July 1st 2017.
82. The commercial provider appears to be putting profit or at least cost cutting before the quality of education. Volunteers should be supernumerary not essential. If it wasn't for the obvious impact it would have on the students, I would stop volunteering because I do not believe the organisation should be able to claim it is providing a service on a commercial basis while relying on volunteers for basic service provisions.
83. Please remove the ACSF from the SEE and AMEP programs. Teaching and assessment should be through an appropriate curriculum such as CSWE. Pathway guidance and goal setting should only be at initial assessment. Classroom sizes need to be dramatically reduced. Rolling starts should end, and learners to start within the first two weeks of each term so that a program can be delivered in sequence without students coming in part way through. It makes planning impossible! Teachers need to have time to plan creative lessons, additional non-teaching duties need to be removed. Overtime needs to be paid! and teachers should have the right to reject overtime and work within standard hours.
84. I'd suggest that ACSF be taken off the AMEP-SEE. The expectation and stress caused by implementing ACSF plus one curriculum simply add to unnecessary workload and teaching activities not really benefitting the students. I believe the priority should be how to help our clients learn better and achieve or improve their English not just focussing on paperwork to be done or boxes to be ticked and in so doing sacrificing the quality of teaching and thus the students/clients.

85. There is a great need for further availability of free English courses for migrants and refugees! Further lessons past their AMEP COURSE to assist with job searches and practice in English conversation.
86. The AMEP is a great program. The ACSF and private RTO's have reduced it to a useless, meaningless money grab that puts profit and compliance first, and migrant education last. It's a shame!
87. The program has to equip the students to be able to speak confidently to be able to assimilate into Australian society, which is lacking.
88. Most of what we do is comply due to concerns of an audit rather than preparation and good practice
89. Please help us, this last contract has been a disaster for both the students and us as teachers.
90. The word is that the financial deal that my employers signed up for has turned out to be much much less lucrative than they hoped for. They are distressed that they are not making any money out of it (indeed the opposite has been the case) so now they are panic-stricken as to what to do about that. The class sizes next year are likely to be huge and I suspect a change proposal will be not far behind. Sessional teachers have been warned about the lack of work that is likely to be available and fixed term contract teachers are not getting their contracts renewed. This will mean financial difficulties for many. It is not a happy situation, and the teachers who remain will have all the burden of the progressive assessments to do for larger sized classes.
91. It is a critical program, - but is under-resourced and needs appropriate resources, PD financial Support for regional and remote areas, and recognition of the complexities of the delivery model, and further compounded in regional remote areas.
92. I sense that (especially since this survey is created by ACTA) "you" have a bias, that a professional TESOL qual is necessary to teach in the SEE program (as well as the AMEP). While this would certainly be ideal, it is expensive - and after allowing for the humanitarian values and skills and attributes, maturity and continual self-motivated learning of any passionate, adaptable lecturer, I can honestly and objectively say that I feel I was a better assessor and teacher for the SEE Program clients than some others who may have had that precious TESOL qual. I DID want to do one - over that 10 year period that I worked in LLNP/SEE, but I could never afford it. Now that I am working in TAFE and earn a lot more, AND have obtained a Commonwealth Supported Place, I CAN afford it and am doing it!
93. I feel that we've been taken our opportunity to teach away by the enormous paperwork. The quality of teaching has been compromised
94. I think a serious action has to be taken into seeing the overall SEE Program because as it doesn't meet the requirements for adult migrants. Clients from the SEE Program are finding it difficult to adhere to the standards of the ACSF & CGEA due to the level of English that is required in both ACSF and CGEA, which is way beyond the capabilities of an adult migrant who often hasn't had an education or a very limited years of education in their country.
95. The AMEP has faced a steady attrition of services and quality due to the competitive tendering process and this is often compounded when it is awarded to for-profit providers. The emphasis in the contract now seems to be less about welcoming and building language skills for thriving than it is about justifying why the government is spending money, and if you can't keep up, require more time or are experiencing difficulties, you miss out.
96. I would like the AMEP to focus primarily on the needs and aspirations of our students, and to be as responsive as possible as they change. I would like teachers to be able to have adequate time to prepare lessons, rather than doing this in unpaid time. I would like unnecessary administrative requirements that do not serve any useful purpose for our students to be decreased or ideally removed. I would like teachers to be recognised as professional, capable, talented, knowledgeable and hardworking, and to feel valued within their organisations.
97. The distress for teachers is to see students' needs and requests ignored, and to be powerless to fix the system which has let them down.
98. It would be better to spend the money Linda Wise receive on PD for all teaching staff. This would go further in ensuring quality.
99. I manage volunteers at my teaching centre, and several of them have remarked on the amount of assessment and paperwork teachers have to do.

100. ACTA, thank you for being so dedicated and relentless in advocating for our learners. To the misguided policy makers who have made a mess of a program which was the envy of many countries, there's no shame in acknowledging your mistakes. Please see the light and make AMEP great again!
101. I feel management of the AMEP and SEE programs has totally lost the plot. The emphasis on KPIs for funding purposes overshadows the need for ensuring there are quality programs for the real needs of migrants/refugees to learn English, Settlement and employment topics. Teachers have been caught up in a whirlwind of significant changes with the new AMEP, curriculum, assessment processes, student management systems etc. The concerns of professional TESOL teachers have been dismissed or put down by management. TAFE management, at all levels, have compounded problems and can even be said to have used bullying tactics to quieten or put down the concerns of teachers. I would like to see a total revamp of the AMEP program where there is a focus on quality teaching that provides time for the teaching-learning process, settlement topics and the love of learning. The overemphasis on assessment tasks that are not valid tools as with the ASCF tasks needs to stop. A curriculum for language learners needs to be designed with learners in mind and not KPIs. Although the CSWE was good it wasn't perfect. Interestingly, TAFE Queensland management have been saying that the 'new' CSWE is not so good. This could be because they continue to defend the implementation of the CSL curriculum. I would like to an excellent TESOL curriculum with materials suitable for migrants and those with a refugee background. I would like to see certificates given on 'participation' so as to avoid the craziness of the current delivery models. What could be designed is a 'functional English' test. These suggestions are based on my own experience of learning ...[name of language deleted to preserve respondent's anonymity] for immigrants.
102. It is my firm belief that the AMEP program should not be tendered out to the private sector, where profit is inevitably the main focus.
103. TAFE Qld are driven by the contract which is not meeting budget so we are stressed and have to do a lot of work done by case managers who are over worked. The team managers are all puppets and political and only care about their own job security. The staff morale has been getting lower and lower. Contracts are now renewed each term and we fear instability and unease. The director has no idea what is happening and only sees the negative figures and not interested in the needs if staff or clients or education. TAFE Qld do not and should not get the contract and it would be more competitive having lots of other providers who can help with the competition and create better competition for all - job security is poor in the sector unless you're permanent and TAFE won't give out these any more in the ELME Dept. Yet other TAFE Depts are rewarding long term hard working dedicated staff. The lucky ones are leaving this. Also extra pressure is on everyone to upgrade their Cert IV TAE. TAFE is placing extra assessment tasks on for internal TAFE staff. Let's hope your survey helps everyone in Qld esp. TAFE.
104. The ACSF has been detrimental for our programme not helped by incompetent management.
105. It is now so removed from solid teaching and learning. The management, KPI culture or cult has totally taken over. So sad.
106. The new Victorian TAFE Agreement says sessional teachers cannot be employed more than 13 weeks at a TAFE. This has been incorporated so that the TAFE offers a contract to the teacher after the 13 weeks of work. However, some TAFEs are openly saying that they can employ sessional teachers only for 13 weeks, following which they'd need to look for work elsewhere. When is this casualisation going to end?? Why would anyone study TESOL or do a Masters or a PhD when there is no guarantee of ongoing work? When will this end?
107. It's so much harder to find joy in a vocation that I used to find joyous. Bureaucracy for the sake of systems is robbing us all.
108. Too much emphasis on reporting hinders the teaching and learning process. CSL does not support EAL learners. No certificate.
