



AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

SPECIFIC PROPOSALS ON ENGLISH LANGUAGE PROVISION

Supplement to Submission 108
to
The Joint Standing Committee on Migration
Inquiry into Migrant Settlement Outcomes

October 2017

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INTRODUCTION

This supplementary submission follows from questions asked by the Committee to ACTA representative Dr Helen Moore on Wednesday 16th August when she attended the Inquiry as an observer and was invited impromptu to the table, and also from our reflections on other evidence given to the Inquiry.

The Committee has heard repeated evidence, on the one hand, that quality English language provision is crucial to successful settlement outcomes and, on the other, that current provision is inadequate in various ways. ACTA has gained the impression that the Committee is interested to hear **specific proposals towards improving English language programs**. This supplementary submission offers such proposals. ACTA very much hopes the Committee will wish to discuss these proposals with our representatives in our hearing on 18th October.

Each one-page section below consists of:

1. a nutshell statement of the problem our proposals address
2. numbered proposals
3. an elaboration or comment, including a summary of the gains offered by these proposals.

The order followed is the same as in ACTA's main submission to the Inquiry (no. 108). Footnotes will cross-reference to supporting evidence and argument in that submission, which we will not repeat here.¹

We note that the main focus of the Inquiry and submissions has been adults and older youth. ACTA hopes that our main submission and this supplement will assist in broadening this focus to include *all* educational sectors with a role in promoting positive settlement outcomes. Changes in each one of these sectors are necessary if we are to tackle the root of the particular problems exercising this Inquiry.

As required, appendices elaborate further on our proposals.

¹ In footnotes, we will refer to this submission as "ACTA submission 108".

GOVERNANCE

PROBLEM 1:

Lack of national governance and oversight of English language provision within a comprehensive settlement framework

1.1 A *National Settlement Framework* (NSF) together with *National Settlement Outcomes* exist but there is **no representation from or impact on those responsible for English language provision.**²

1.2 The *NSF* is focussed **almost entirely on adult migrants.**

Proposals to strengthen the NSF governance structure and its monitoring of outcomes

1. The *National Settlement Framework* (NSF) and *National Settlement Outcomes* should be used as a basis for annual reporting to the Council of Australian Governments (COAG).
2. **Four English language sub-committees** should be created within the **NSF Senior Officials Settlement Group (SOSG)** consisting of officials responsible for English language and related provision for:
 - i. adults including those in the Vocational Education & Training (VET) and Higher Education systems
 - ii. school children
 - iii. refugee youth in all systems
 - iv. infants and young children eligible for Early Childhood Education & Care (ECEC).
3. These committees should further develop the NSF and NSF Outcomes to ensure **more explicit attention to English language provision** for the adult, school and ECEC sectors.
4. **Starting in 2018, annual reports on English language and related outcomes** across all sectors should be required from these sub-committees.

Elaboration

See Appendix A for a diagrammatic representation of this proposal.

² See ACTA submission 108: Executive Summary para. 9 & section 3.2 (pp. 5, 43-44).

EARLY CHILDHOOD EDUCATION AND CARE

PROBLEM 2:

Migrant- and refugee-background infants and young children under-represented in Early Childhood Education and Care facilities

2.1 The Inquiry's Terms of Reference are ostensibly far-removed from issues related to Early Childhood Education and Care (ECEC). Among the submissions to the Inquiry, we have so far not seen any that consider:

- i. the place of ECEC in settlement services
- ii. the undisputed evidence of positive whole-of-life outcomes for children accessing ECEC
- iii. the heightened benefits for speakers of languages other than the dominant language in society
- iv. the clear evidence that **failure to access ECEC has long-term consequences directly relevant to the Inquiry's concern for alienated migrant-background youth.**³

2.2 Despite national commitment to and policies facilitating universal access for children for at least one year prior to entering school, **migrant- and especially refugee-background children frequently are not accessing ECEC.**⁴ The reasons appear to be:

- i. lack of information
- ii. cross-cultural and linguistic barriers
- iii. insufficient financial support.

2.3 Regarding financial support, ACTA is unclear whether recent initiatives to improve support for families who cannot afford ECEC have extended to migrants and refugees, and, if so, how effective these initiatives are proving to be. Existing infrastructure and resources are well-placed to remedy the other two problems, as we describe in our main submission to the Inquiry.⁵ All that is required is their specific direction and monitoring of outcomes in relation to this target group. Our recommendations to strengthen the *National Settlement Framework* and its associated *Outcomes* are directed to this goal (see Proposals 1 - 4 above).

Proposal that the Inquiry include Early Childhood Education & Care in its considerations

5. **ACTA cannot recommend too strongly that the Inquiry include attention to improving migrant- and refugee-background children's access to ECEC as a fundamental strategy in developing long-term solutions to the problems it is addressing.**

Comment

See main ACTA submission Executive Summary paras. 12-15 (p. 6); sections 3.3 & 4.1 - 4.13 (pp. 45-48, 106-108).

³ See ACTA submission 108 section 3.3.1 (p. 45).

⁴ See ACTA submission 108 section 3.3.2 – 3.3.1 (p. 46-48)

⁵ See ACTA submission 108 section 4.1 (pp. 106-108).

ENGLISH LANGUAGE PROVISION IN SCHOOLS

PROBLEM 3:

No nationally agreed and consistent framework for identifying English language learners in the school sector

3.1 **No nationally agreed mechanism** exists for identifying and reporting on English language learning needs or outcomes in Australian schools, despite ACTA's estimate of over 300,000 learners of **English as an additional language/dialect (EAL/D)** across all systems.⁶

3.2 NAPLAN and other forms of national data collection use the category **Language Background Other than English (LBOTE)** to identify English language learners, which is grossly misleading because it confuses and conflates English language learners' needs and outcomes with those of:

- i. LBOTE students who have reached or exceeded age-appropriate English language norms, *or*
- ii. failing English mother tongue literacy learners, *and/or*
- iii. LBOTE students classified as socio-economically disadvantaged.⁷

3.3 The result is that policies, programs, teaching approaches and accountability mechanisms at Commonwealth, State/Territory, system and school levels **do not target English language learning needs and outcomes**.⁸

3.4 The recently developed *National Framework for Assessing English Language Proficiency* offers a mechanism for solving the problem of correctly identifying those who require English language tuition/support. The Framework has been endorsed by the Education Council, which is considering options for further work and implementation. Gaining national agreement on its final form is a matter of urgency.⁹

Proposal to use a nationally consistent approach to assessing English language proficiency as the means of identify English language learning needs in schools

6. The Education Council should **expedite completion** of the *National Framework for Assessing English Language Proficiency* as a matter of urgency.
7. **COAG should endorse this Framework** as the nationally accepted means of identifying English language proficiency in the school sector.
8. A nationally agreed Framework for assessing English language proficiency should be used as the basis for **allocating targeted EAL/D Commonwealth funding** in the 2018-2021 schools funding quadrennium.
9. Other inaccurate and misleading identifiers **should be discontinued**, notably Language Background Other Than English (LBOTE) and Disadvantaged LBOTE.

Comment

Without a **nationally consistent and agreed measure of English language proficiency in schools**, allocation of resources, system planning and interventions cannot be effectively targeted and their outcomes will remain unknown.¹⁰

⁶ For what is meant by **EAL/D learners**, see ACTA submission 108 section 3.4.1 (pp. 49-50).

For an outline of this history, see ACTA submission 108 sections 3.4.2-3.4.4 (pp.50-56).

⁷ For why these categories are incorrect, see ACTA submission 108 Exec. Summ., para 19 & sections 3.4.1 & 3.4.4 (pp.6-7, 49-52, 52-57).

⁸ For EAL/D best practice, see ACTA submission 108, section 4.2 (pp.109-123); also ACTA submission to the Productivity Commission Inquiry into the National Education Evidence Base (DR120) at: http://www.pc.gov.au/data/assets/pdf_file/0004/208963/subdr120-education-evidence.pdf, pp.7-9.

⁹ For a description of this project, see ACTA submission 108 sections 3.4.4 (3), 4.2.3 (3) & Appendix A item 7 (pp. 56, 121, 196)

¹⁰ See ACTA submission 108 Recommendation 7 (p. 16).

PROBLEM 4:

Support for EAL/D learners decimated as an unintended outcome of State/Territory school autonomy and devolved budget policies

4.1 All EAL/D policy responsibility now lies with States/Territories following **the discontinuation of targeted Commonwealth programs for EAL/D learners:** the *English as a Second Language (ESL) General Support Element* in 1997 and the *ESL New Arrivals program* in 2008.¹¹

4.2 States'/Territories' school autonomy and flexible resource management policies **have devolved decision-making to schools.** Widespread erosion of EAL/D provision has followed, for example:

- i. **system level policy-making, planning and oversight** for EAL/D provision in schools has been weakened or completely discontinued
- ii. **'one line' budgets** have untied former specific-purpose funding for EAL/D learners
- iii. EAL/D programs, classes and the employment of qualified EAL/D teachers have been supplanted by **other priorities in school-based decision-making**
- iv. **system-based specialist EAL/D consultancy services** to schools have been dismantled and, in some places, placed on a fee-for-service basis
- v. **EAL/D professional development** for teachers has diminished
- vi. **consistency, transparency and accountability in the use of EAL/D funding** no longer exists.¹²

See Appendix B for graphic reports from ACTA members on the deteriorating situation in schools.

Proposals for a coherent national policy framework for EAL/D in schools

10. Commonwealth school funding agreements with State and Territory Governments should include **specific EAL/D accountability requirements** directed to ensuring targeted funding, quality provision, outcomes monitoring, and annual public reporting.
11. An agreed *National Framework for Assessing English Language Proficiency* should be used as the basis for **national data collection and reporting on English language needs, use of EAL/D Commonwealth funding, and English language outcomes** in schools.
12. This Parliamentary Committee should instigate or recommend on an appropriate body to **investigate the impact of devolution policies on EAL/D provision in Australian schools.**
13. The NSF Senior Officials Settlement Group should authorise **development of national best practice standards** for effective EAL/D provision in schools within the *National Settlement Framework* (NSF) and the *National Outcomes Standards*.
14. State/Territory reporting on NSF Outcomes (see Proposal 4) should be based on the nationally agreed proficiency measure for EAL/D.

Comments

Deteriorating EAL/D provision in schools requires urgent attention. The *National Framework for Assessing English Language Proficiency* and the *National Settlement Framework* and its associated *Outcomes* have the potential to address problems in, respectively, targeting and accounting for resources, and declining standards in provision.¹³

¹¹ For an outline of this history, see ACTA submission 108 sections 3.4.2-3.4.4 (pp.50-56).

¹² For an elaboration of these problems, see ACTA submission 108, Summ. paras. 16-18, 21 (pp. 6, 7), section 3.4.5 (pp. 57-73). For individual State/Territory reports, see ACTA submission 108 Table 5 pp. 58-60; for State/Territory Intensive English Language (IEC) Centres for New Arrivals, see Table 7 p. 120. Note: (1) lack of IEC provision at Primary level in NSW, Queensland and Tasmania, (2) in WA, Centres are now located in schools and managed at the Principal's discretion.

¹³ For a description of best practice, see ACTA submission 108, section 4.2.1 (pp. 109-113). In collaboration with the Australian Institute for Teaching and School Leadership (AITSL), ACTA has developed a set of evidence-based national best practice standards for EAL/D program provision at system, school and classroom levels: <http://www.aitsl.edu.au/RESOURCES/Australian-Professional-Standards-for-Teachers>

ADULT ENGLISH LANGUAGE PROVISION

PROBLEM 5:

Fragmentation and incoherence in English programs for adult migrants

5.1 The **Adult Migrant English Program (AMEP)** has become increasingly fragmented, inflexible, and overlapping with the **Skills for Education & Employment (SEE) Program**.¹⁴

5.2 Although the SEE Program is essentially the only pathway from the AMEP, it is restricted to “jobseekers” as determined by Centrelink. Spouses of skilled migrants and other visa categories are excluded. Others are blocked by their inability to meet SEE Program KPIs.

5.3 Policy for and administration of the SEE Program is directed to job seekers who lack basic literacy and numeracy skills. Little consideration is given (e.g. re class composition) to the **fundamentally different learning needs of those who were schooled mainly in Australia (effectively English native speakers) versus those of English language learners**.

5.4 Other provision occurs through:

- i. an indeterminate number of currently non-feeing paying “Foundation” and “Enabling” courses in TAFE and Universities (see 6.2 below)¹⁵
- ii. various ad hoc, disparate and insecurely funded community programs.

Proposals to focus and articulate pathways in adult English language & literacy provision

15. **The AMEP** should become the main government-funded program for **adult English language learners**:
 - i. in the first 5-6 years after arrival
 - ii. **up to completion of Level 3** on the Australian Core Skills Framework (ACSF).
16. **The SEE Program** should be retained as a program catering for **job seekers with literacy & numeracy needs whose schooling has been mostly (or all) in Australia**.
17. **TAFE and Universities** should be responsible for:
 - i. **ACSF Level 4 and above** for adult migrants, **including bridging courses into professions** where their overseas qualifications are not recognised
 - ii. adult migrants at lower levels who have been in Australia **for more than 6 years**
 - iii. people **whose schooling has been mostly (or all) in Australia** and who require “enabling” and Foundation Skills courses to access TAFE and Higher Education.
18. **Community-based programs** should be supported to meet targeted local needs.

Comment

Implementing this proposal would:

- i. simplify, clarify and clearly articulate program goals, provision and pathways
- ii. end complex eligibility requirements and restrictions
- iii. give the AMEP and SEE Program clear focus and improved coherence
- iv. increase flexibility in AMEP Centres to allow creation of classes and pathways that respond to local and changing learner cohorts.

See **Appendix C** for an elaboration of these proposals. See **Appendix D** for examples of learner English at different assessment Levels.

¹⁴ For a summary of what is offered through the AMEP and SEE Program, see ACTA submission 108 section 3.5.1 (pp. 76-77).

For program fragmentation, overlapping & unclear goals see Exec. Summ. paras. 22-24 (pp. 7-8) & sections 3.5.2 – 3.5.3 (pp. 74-86). For the most recent reviews of both programs, including the relationship between them, see:

https://docs.education.gov.au/system/files/doc/other/amep_evaluation_report_-_for_public_release.pdf

https://docs.education.gov.au/system/files/doc/other/see-amep_alignment_report.pdf

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

¹⁵ For a description of programs in the TAFE sector, see ACTA submission 108, quote on p. 74.

PROBLEM 6:

Insufficient tuition hours in the AMEP

6.1 The AMEP provides 510 hours English tuition to learners who register for the Program in the first six months after arrival and are assessed as having less than “functional English”.¹⁶ Some learners qualify for further “capped” entitlements.¹⁷ These hours are **insufficient for most learners at low levels to achieve “functional English”** and have no basis in any credible research.¹⁸ Approximately 32% of clients enter the AMEP assessed as having “zero” English language proficiency. After 500 hours of tuition, approximately 16% are still at this level.¹⁹

6.2 The options for migrants who have exhausted their AMEP hours *or* with levels higher than “functional English” *or* did not register in the required time are:

- i. **the SEE Program** (but see Problem 5 above)
- ii. **community programs**
- iii. **“Foundation” and “Enabling” courses in TAFEs and Universities**, which are scheduled to become fee-paying under legislation currently in the Parliament
- iv. **fee-paying courses for international students** in VET and Universities.

Proposal to define eligibility and entitlements to the AMEP **on the basis of migrants’ English language levels and previous education**

19. Eligibility for the AMEP, including number of tuition hours, for those in the first six years after arrival should be determined in relation to **English language levels up to completion of ACSF Level 3 and years of previous education.**

Comment

Implementing these proposals would:

- i. relate tuition entitlements to English learning needs
- ii. eliminate/reduce complex visa and Centrelink requirements.

The proposal to determine needs in relation to English levels entails increased AMEP expenditure but this would be off-set by a reduction in SEE Program funding because English language learners currently in the SEE Program would be in the AMEP (see Proposals 15 & 16 above).

See **Appendix E** for an elaboration of this proposal.

¹⁶ For the Immigration Department’s definition of “functional English”, go to <https://www.border.gov.au/about/corporate-information/facts/how-can-i-prove-i-have-functional-english> See Appendix C for examples of “functional English”.

¹⁷ That is, funding is limited, subject to change and must be found within providers’ overall budgets.

¹⁸ For research into the time it takes to learn new languages, see ACTA submission 108, section 2.3 (pp. 34-39). For how the 510 hours entitlement was determined, see the penultimate paragraph in Table 1 (p. 38).

¹⁹ For the most recent data on entry and exit levels from the AMEP, see https://docs.education.gov.au/system/files/doc/other/amep_evaluation_report_for_public_release.pdf chaps. 4-5.

PROBLEM 7:

**Quality English language provision
undermined by Departmental policies, decisions, administration and organisation**

The goals, decision-making, commitments and organisation of the Department of Employment and Training (DET) do not support coherent quality English language provision.

For example:

7.1 The Department has **no administrative “centre of gravity”** directed to post-school English language provision.²⁰ The AMEP & SEE Program are managed in **separate DET units** with disparate, overlapping and competing goals (see Problems 5 and 6 above).

7.2 The AMEP’s settlement role is being increasingly marginalised and displaced by DET’s **employment goals**.²¹

7.3 **Collection and management of data** on learner transitions between the AMEP and SEE Program appears to be non-existent.²² Data that would allow comparison of take-up and outcomes from the AMEP and SEE Program is obscure and virtually impossible to interpret.²³

7.4 Decisions are made and administrative requirements imposed with **no regard to the consequences for providers, teachers or students**. Recent notable examples are:

- i. the imposition of a complex new assessment scheme with no account taken of the infrastructure and human resources required to support it – no data management system; no phasing-in period; insufficient and, in places, non-existent teacher professional development²⁴
- ii. termination of a quality program for refugee youth in Melbourne²⁵
- iii. contracts again awarded to providers with no track record in English language provision and questionable capacity to manage, deliver and sustain quality programs.

See **Appendix F** for members’ descriptions of the current situation in the AMEP & SEE Program.

**Proposals to re-direct DET policy-making, decision-making and administration
towards effective English language provision for adults**

20. The separate AMEP and SEE Program administrative units in the Commonwealth Department of Education and Training (DET) should be replaced by **one upgraded section** with a mission to develop policy and administer and supporting **quality and coherence in in English language & literacy learning provision for adults and refugee youth** in the AMEP, SEE Program, TAFE, Higher Education, and community programs. This mission should be informed but not driven by employment goals.
21. This section’s administration of the revised AMEP should be held **accountable within the National Settlement Framework and its structures** – see Proposals 1 - 4.

²⁰ See ACTA submission 108, Exec. Summ. para. 26 (p. 8), section 3.5.3 (pp. 83-86). A recent Centre for Policy Development report is scathing in its criticism on this point: Centre for Policy Development report (Feb. 2017) *Settling Better: Reforming Refugee Employment and Settlement Services*, pp. 33 <https://cpd.org.au/2017/02/settlingbetter/>

²¹ See ACTA submission 108, section 3.5.2 (3). See also https://docs.education.gov.au/system/files/doc/other/amep_evaluation_report_-_for_public_release.pdf p. xii

²² See https://docs.education.gov.au/system/files/doc/other/see-amep_alignment_report.pdf pp. 9-11, 17-18; also ACTA submission 108, section 6.3 (p. 161).

²³ See for example https://docs.education.gov.au/system/files/doc/other/see_programme_evaluation_report.pdf

²⁴ See ACTA submission 108, section 3.5.4 (pp. 87-90)

²⁵ See ACTA submission 108 section 4.4.4. This section was written prior to the award of the new contracts and in ignorance of them. We cite this program as exemplary practice: see Figure 2 and other references to AMES Australia.

Comment

Implementation of this proposal could:

- i. **reverse the current lack of direction, commitment and coherence** in policy-making for English language and literacy provision for adults and refugee youth with minimal/no previous education
- ii. **allow a focus on improving pathways**, for example removing interrupted and blocked pathways from the AMEP to the SEE Program, and facilitating access to mainstream VET & Higher Education
- iii. **align administrative goals with educational requirements**
- iv. **allow coherent and comprehensive data collection** on program outcomes.

PROBLEM 8:

Short-term contracting for English language programs

8.1 Short-term contracting since 1996 has repeatedly led to:

- i. chronic program instability
- ii. course disruption and student discontinuations and exclusions
- iii. extensive waste of human and material resources
- iv. loss of accumulated professional knowledge and expertise
- v. increased risk of provider collapse and/or delivery of poor quality programs
- vi. a “survival” risk-averse provider mentality
- vii. professional demoralisation.²⁶

See also **Appendix F**.

Proposal to reorient the tender system according to “risk assessment” principles

21. The award and monitoring of contracts for the AMEP and SEE Program should be streamlined and modernised as follows:
- i. Overall provider performance should be **assessed annually and rigorously** by independent assessors (along the lines of the current verification process) on a **5-point performance ranking scale**, viz.:
 - A = outstanding performance
 - B = good performance
 - C = satisfactory performance
 - D = somewhat unsatisfactory performance
 - E = unsatisfactory performance.
 - ii. The scale should be determined in relation to KPIs devised by DET in collaboration with providers and external experts in English assessment and public administration. A research project should be instigated to **research and develop effective and viable KPIs** for the next round of contracts.
 - iii. **Providers scoring C or below more than once in any 4 year period** should be asked to show cause as to why their contract should be re-opened for tendering.
 - iv. **Providers who consistently score A or B** should not be required to compete for new contracts until a new 10 year cycle – see below.
 - v. New tenders for all provision should be called **every 10 years**.

Comment

This streamlined “risk-based” tendering system would:

- i. redirect human energy and time to productive work rather than tender preparation
- ii. create program course stability for students
- iii. allow for long-term planning and pathway provision
- iv. bring transparency to the allocation of contracts
- v. lessen the risk of provider collapse and failure to detect poor quality programs
- vi. restore professional morale
- vii. save money.

²⁶ See ACTA submission 108 Exec.Summ., paras. 23 & 25 (pp. 7 & 8), section 3.5.5 (pp. 90-92).

PROBLEM 9:

**Disconnect between English language programs
and other areas of Settlement Services**

9.1 The AMEP, and especially the SEE Program, operate as silos insulated from other Settlement Services. Collaboration relies entirely on local initiative and good will. Support and incentives at Department level are non-existent.

9.2 The problem is aggravated by short-term contracting and narrow KPIs (see Problems 7 and 8 above), both of which encourage providers to be inward-looking.

**Proposals to create an effective interdepartmental structure
with specific coordination, management and reporting functions
for adult English language provision
under the aegis of the *National Settlement Framework***

- | |
|--|
| <p>22. An inter-departmental DET and Social Services Committee should be created that has authority to ensure co-ordination and collaboration in all aspects of Settlement Services.</p> <p>23. This Committee should be required to report annually to the NSF SOSG (see Proposals 1 - 4 above) specifically on:</p> <ul style="list-style-type: none">i. program-specific English language outcomes, i.e. the AMEP, the SEE Program, TAFE and Higher Education, including special programs for refugee youth with minimal/no previous schooling and intervention programs for at-risk/alienated migrant-background youth (see below)ii. issues relating to coordination between the AMEP (reformed as per our Proposals 5 and 6 above) and all other aspects of Settlement Services. |
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Comment

Proposals have been put to the Inquiry that the AMEP should be located “inside the settlement context” – in effect within the Department of Social Services, which manages many other aspects of Settlement Services.²⁷

ACTA strongly opposes this proposal because such a move would:

- i. aggravate all the problems identified above
- ii. further disconnect the AMEP from effective policy-making for pathways from the AMEP into mainstream education and training – this disconnection has always been recognised as its most fundamental and besetting problem
- iii. constitute the third major disruption to adult English language provision in approximately as many years.

In ACTA’s view, DET is best placed to ensure coherence and pathways in English language and literacy provision for adults and youth in the post-school sectors because of its overall responsibility for education and training, and despite the problems we and others have identified in its current approach. DET must be tasked to commit to **a coherent, collaborative, responsive, multi-faceted and effective approach to quality settlement-oriented English language and literacy provision as a program goal in its own right; settlement goals should include but extend well beyond narrowly-defined short-term employment goals.**

²⁷ See evidence from Mr Paris Aristotle, Inquiry Hansard 21 June, 2017, pp. 7-8.

REFUGEE YOUTH WITH HIGHLY DISRUPTED/MINIMAL/NO PREVIOUS SCHOOLING

PROBLEM 10:

Lack of policy and provision targeting these young people's special learning needs

10.1 The Australian education system is **organised on age-based assumptions** that do not accommodate the learning needs of youth aged 15 to 25 with little/no previous schooling.²⁸

10.2 In schools, **these youth are placed in age-appropriate classes** where they lack the English, educational and learning-how-to-learn skills these classes assume, and so drop out quickly.²⁹

10.3 Problems 3 and 4 in schools identified above exacerbate the difficulties confronting this group.

10.4 These youth have high aspirations and excellent motivation to succeed but do not understand and **are poorly advised about their educational options**.³⁰

10.4 The AMEP is well-placed to develop appropriate programs for these youth but is **prevented from so doing by:**

- i. inflexible regulations that block 15-17 year olds' access to the AMEP³¹
- ii. perverse incentives that encourage schools to enrol these youth³²
- iii. failures in advising these young people about their options
- iv. policy failure to recognise what is required to create programs and pathways to meet these learners' needs.³³

Proposals to meet the needs of refugee youth with minimal/no previous schooling

22. The *National Settlement Framework* and associated governance should be revised to include **a specific focus on refugee youth with highly disrupted/minimal/no previous education**.
23. The DET section and interdepartmental committee recommended above (Proposals 19 and 21) should create **a special Refugee Youth Task Force** with the authority to:
 - i. audit and improve training and information for youth workers, community leaders, Humanitarian Settlement Services, sponsors, pre-embarkation advisors and others in contact with these youth on their educational options and possible pathways
 - ii. overcome the barriers that prevent these youth from moving between school and the AMEP (and vice versa) in order to access locally available programs that best meet their needs
 - iii. monitor the award of AMEP contracts to ensure continuity in established quality programs for these youth
 - iv. offer seeding grants for new initiatives in this area, where providers can demonstrate long-term viability within overall provision and pathways into mainstream education and training.

Comment

Unless this group of refugee youth attracts **a policy focus that targets its special needs**, its members will remain extremely vulnerable to "falling through the cracks" and disconnecting from mainstream education, training and employment.

²⁸ See ACTA submission 108, sections 2.4, 3.6.1, 4.4.1, 4.4.3 (pp. 39-40, 94-100, 135-136, 137-139).

²⁹ See ACTA submission 108, p. 99.

³⁰ See ACTA submission, section 3.6.1 (2), 3.6.2, 4.4.2 (pp. 102, 136-137)

³¹ See ACTA submission 108, section 3.6.3 (pp. 102-103)

³² Ibid and also p. 63.

³³ See ACTA submission 108, section 3.6.4 (pp. 103-104); also AMES Australia submission 25, p. 14 – the specialist Program for young Adults is the one terminated in the latest round of AMEP contracts.

SOCIAL DISENGAGEMENT, ANTI-SOCIAL BEHAVIOUR & GANG ACTIVITY BY YOUTH MIS-IDENTIFIED AS ‘MIGRANTS’

PROBLEM 11:

**Community anxiety about a small group of visible minority young men
who are misidentified as “migrant youth”,
coupled with failure to address the issues that lead to their social alienation**

11.1 **Media-fuelled and politically motivated concern in Victoria** about a small group of visible Sudanese-and Pacifica-background youth in public brawls, car-jacking and home invasions in 2016 prompted this Inquiry’s consideration of extending character test provisions to allow deportation of younger migrant-background youth.³⁴

11.2 The Victorian Police submission to the Inquiry provides clear evidence that **this concern is misplaced**,³⁵ among other things in regard to:

- i. **the migration status of offenders**, given that data is not collected on this matter unless the reason for contact with the police relates to a migration issue (p. 11)³⁶
- ii. **the composition of the so-called Apex gang**, which, in fact, began with Pacifica youth, and is not predominantly Sudanese, has a diverse membership, including African-background members, and is predominantly involved in car theft (p. 11)
- iii. **the common ground in offending**, which is not migrant-background but rather **networking** by “a diverse range of young people” (p. 12).

11.3 On the basis of established and clear evidence that **alienation from education is a significant risk factor in youth anti-social behaviour in both the general Australian and migrant-background population**,³⁷ the young people causing this Inquiry’s concern probably include some of those ACTA has identified as refugee youth with minimal/no previous schooling, among whom were unattached minors who entered Australia through the humanitarian program during the peak Sudanese refugee intake between 2001 and 2006. These young people have grown up in Australia, and are, or were, enrolled in Australian schools which did not (and mostly could not) meet their very particular learning and related needs (see Problem 10 above). Especially visible minorities such as Sudanese youth are a vulnerable, high risk group liable to school disengagement caused by *social exclusion* due to school climate, disciplinary procedures, peer groups, bullying and racism, and *academic exclusion* due to language, literacy and learning barriers posed by school curriculum, organisation and teaching.³⁸

11.4 The proposal to adopt an American-inspired approach of deporting migrant-background youth who have grown up in Australia, whose “character” is still being shaped by their experiences here and who have become involved in criminal activity is **contrary to basic human rights, and inappropriate and inconsistent with Australia’s treatment of crime by other minors**.³⁹

Beyond ACTA’s educationally directed proposals for addressing the causes of migrant-background youth’s social alienation (see *all the Proposals* above), we refer the Inquiry to our Recommendations 18, 19 and 20 in the main ACTA submission 108 (p. 21).

In regard to extending the character test to allow deportation of minors, we repeat our Recommendation 19 that the Inquiry should reject this proposal. It is fundamentally inconsistent with Australian values and our international commitments to basic human rights.

³⁴ For ACTA’s criticism of the term “youth migrants”, see ACTA submission 108, Exec Summ para. 3 (p. 4), section 1.3.2 (p.p. 23-24).

³⁵ Victoria Police submission No. 107 to this Inquiry.

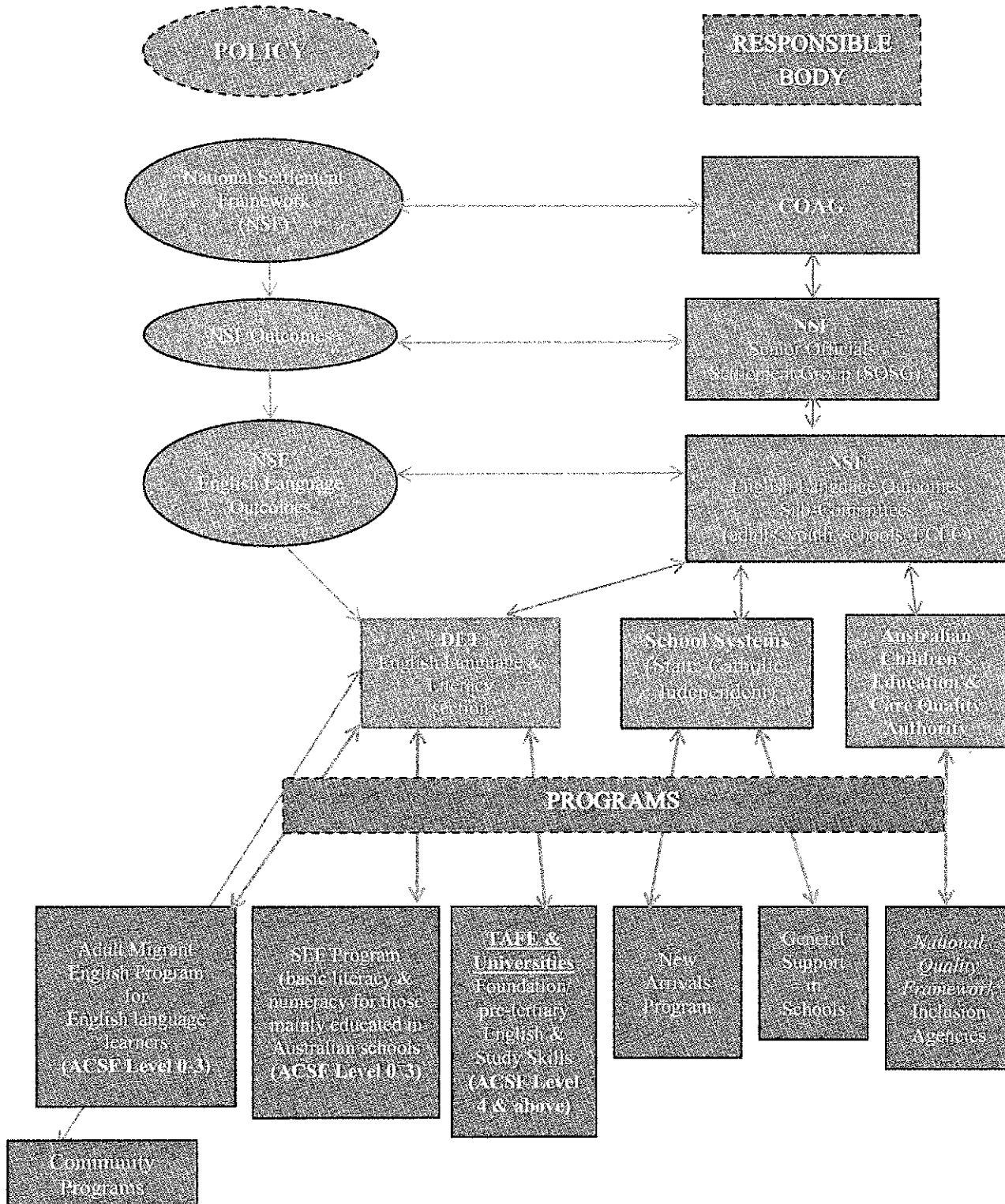
³⁶ See ACTA submission Table 1 cell labelled 5-16 and comment on NAPLAN data in the last paragraph; also section 6.3 (pp.161-162)

³⁷ See ACTA submission 108, section 7.2.2 and Tables 9 & 10 on risk factors (pp. 172-177); also section 7.2.4 (pp. 180-183).

³⁸ See ACTA submission 108, section 7.2.3 (pp. 177-180).

³⁹ See ACTA submission 108, section 7.3 (pp. 183-189)

APPENDIX A:
Proposed Governance of English Language Provision
based on
The National Settlement Framework and Outcomes



APPENDIX B:

Sample Comments by Teachers in ACTA 2016 Survey⁴⁰

The impact of State/Territory-office restructures:

All aspects of EAL/D services have been cut and scaled back at both a school & system level over the past 5 years!!! Significant erosion of services leaving EAL/D students at all levels of schooling at much greater risk than ever before.

The Department of Education has systematically diminished the centrally located EAL/D team and left EAL/D programs (support in mainstream and IECs) at the mercy of mainstream admin teams.

There is no EAL/D team in our State really supporting schools as per the past. There are no consultants in district office or ESL visiting teacher. There is no real voice in the Department any more for EAL/D.

There is an increasing isolation felt by EAL/D teachers, especially in other schools around us. We live in a vacuum now.

The key role of principals:

Our Principal makes all the decisions regarding what our EAL/D students need and who our EAL/D teachers can teach.

The funding is controlled by a principal who doesn't understand the value of EAL/D teaching and supports large class sizes with little assistant time.

Several changeovers of the principal position have affected the allocation of funds to EAL/D students. So, everything depends on what the principal values.

Total control by the Principal – funds, resources and staff and support diverted away from EAL/D students without consultation or ability to influence decision making.

Principals are choosing where to channel the funds and often funds are not directed to cater for the needs of EAL/D learners.

Funding is not being used for the purpose it is intended. There is a clear difference in levels of progress and achievement between students who were supported by EAL/D allocation prior to the changes (3 years ago) and those younger students who have not received the support they are entitled to.

Dilution of EAL/D funds when pooled with other funds:

All funding for our EAL/D students has been put into the school general budget. We don't have a separate budget for EAL/D students.

Giving autonomy to schools rather than the region means it's often integrated into other funding such as literacy or learning support and doesn't recognise EAL/D pedagogy.

EAL/D funding is being pooled with Special Education funding, so Special Education teachers are asked to take on the role – with no ESL training.

Diversion of EAL/D funding to solve local staffing problems:

There's a tendency in schools to employ staff who suit their timetabling arrangements rather than staff who have knowledge and experience in EAL/D support

Leadership team has decided not use EAL/D position to support EAL/D students but to instead use position to give teachers their non-contact mandated planning time

Dedicated classroom teacher position (part time) for EAL/D has been absorbed into general school staffing points

The original EAL/D position has been lost in part by the need to provide release time for teachers

Execs in primary are given EAL/D and most have no passion for the role.

EAL/D learners not seen as a priority:

Students are simply not a priority. ... the school knows that they won't have to worry about parents being upset with their students being marginalised.

The school does not promote and value EAL/D and believes that EAL/D students "catch up" with mainstream.

Since schools have become autonomous, any way to save money is looked for and very often it is at the expense of the EAL/D students.

Lack of understanding of EAL/D learner needs:

Schools are making decisions on funding without appropriate knowledge about the needs of students.

Across the system most schools do not have the understanding of EAL/D matters to make informed decisions about catering for EAL/D students' learning needs.

⁴⁰ This material is extracted from ACTA submission 108, section 3.4.5 (2) (pp. 62-71).

School leadership have very limited understanding of curricular and language learning needs of students. No real understanding of how seriously at risk many EAL/D students are of achieving secondary graduation impacting schooling outcomes in a very negative manner.

Lack of transparency and accountability in allocating and using EAL/D resources:

Schools are at the whim of the knowledge of Principals who have no knowledge of EAL/D teaching. Lack of accountability in how funding is used.

The administration team can allocate/distribute their one line budget funds however they choose. Not like before where the funds generated through the census equalled a certain FTE for EAL/D. There is no accountability any more.

There needs to be greater accountability. If the school receives funding from the government for EAL/D students through the school census, then they need to show evidence that these funds have been used to enhance the learning of those students.

Casualisation of EAL/D teaching:

EAL/D teaching specialist positions devolved are being reduced to part-time or replaced by generalist teachers.

Over the past two years we have seen the demise of TESOL support with specialist teachers being reduced to part-time and expected to take release lessons and mainstream classes.

Unpredictable and unbalanced from year to year, never know if I will have a job. Never know whether to spend money on long-term resources and programs.

Teachers are working additional hours and putting in enormous efforts to support the EAL/D students yet often find themselves unemployed at the end of the school year or made to teach mainstream classes.

Devaluing of EAL/D teaching expertise:

The new philosophy is specialists are out and teachers can teach in any position required in the school.

Teachers are no longer required to have TESOL qualifications to teach in TESOL contexts.

Fewer qualified EAL/D teachers and questionable allocation of EAL/D staff responsibilities.

Never consulted; advice not sought; and given advice ignored.

There is a loss of expertise accumulated over decades.

The system doesn't care and doesn't listen to the people who do care.

Decreased professional development opportunities:

Eradication of the Multicultural consultancy has dramatically reduced TESOL professional learning for all teachers, particularly in policy and pedagogy support and current research.

Very little if no PL [= professional learning] provided by the system or district offices I often get calls from schools to provide them with advice and PL – which I am unable to do due to my role within the school being overloaded.

Teachers need to access this kind of learning on their own initiative and are required to fund it themselves.

Since we no longer have regional consultants, we do what we can for ourselves.

No funds made available for TESOL professional learning.

TESOL professional development has significantly decreased.

Erosion of specialist provision for EAL/D students:

EAL/D programs/provision/services have been seriously eroded over the past several years in our State. Programs closed, funding reduced, teacher/leader time cut, funds allocated for EAL/D used for other school purposes, no accountability for use of funds exists, mainstream teacher knowledge of EAL/D learners language/literacy needs diminished with lack of PL provision.

Every aspect of EAL/D provision in our State has been negatively impacted by recent funding models, and general lack of commitment at both school/system levels has resulted in a significant deterioration of EAL/D service provision. EAL/D is in the worst condition I have ever experienced in my teaching career.

There's much less effective support reaching fewer in need/at risk learners. Programs slashed, positions/classes/levels of support disappeared. My position time reduced.

My school had 4 teachers over the whole school years ago and now we have one in the senior school, a 0.2 FTE [full-time equivalent] person to mentor fee paying students and literacy support (0.4 – 0.6 FTE) in the middle school.

EAL/D programs have vanished and dedicated EAL/D teacher support no longer offered to EAL/D students.

There is very little continuity of EAL/D teachers, year to year. Focus more on funding than improving EAL/D students' literacy.

Students are left to "get on with it" and learn without adequate resources.

Students in junior school do not have access to EAL/D trained teachers and sit quietly in the classroom. Their level of language has been impaired by decentralised school funding and ESES [= Every School, Every Student] system.⁴¹

⁴¹ ESES is the NSW policy framework for learning support/disability <http://www.dec.nsw.gov.au/what-we-offer/education-and-training/disability-support/every-student-every-school>

APPENDIX C:
AMEP and SEE Program in ACTA's Proposed Restructuring
(Proposals 5, 6 & 7)

RESPONSIBLE BODY AND PROGRAM	LEARNER LENGTH OF RESIDENCE AND ENGLISH LEVEL ASSESSED BY PROVIDERS	PROGRAM DETAILS
DET: Adult Migrant English Program (AMEP)	- in Australia less than 6 years - ACSF 0⁺ to 3 (or equivalent)⁴²	Specific offerings to be determined by providers in consultation with DET to meet needs of local cohorts. Overall provision to include: - Basic – Advanced English⁴³ for those with previous education to equivalent Year 10 or above (fast track) - Basic – Advanced English for those with previous education equivalent to Years 4-10 - Basic – Intermediate/Advanced English for the elderly and others not seeking pathways to education & employment - Special Preparatory Program (SPP) for those with minimal/no previous schooling. Depending on local cohorts, English programs at post-Basic levels targeted towards specific goals & pathways. Delivery modes to include: - Full-/part-time day & evening classes - English in the Workplace (would need specialist teachers). - Flexible part-time/evening class options.
DET: AMEP	New arrivals ⁴⁴ <i>irrespective of ACSF level</i>	Orientation to Australia (20-40 hours) focus on basic settlement issues, the Australian education and political systems; seeking & applying for employment (c.v. preparation; interview techniques; sociolinguistic issues re politeness etc.) This course can be separate or integrated within AMEP entitlements . (This proposal is elaborated in ACTA's supplement to our submission 292 to the Senate Inquiry into the Citizenship Amendment Bill). ⁴⁵
DET: SEE Program	ACSF 0 ⁺ to 3	Basic literacy & numeracy – assumes native speaker oral English and the majority of schooling in Australia but learners have not achieved basic literacy & numeracy norms. (Most students would probably be below ACSF 1.)
DET in collaboration with Social Services	ACSF levels determined in relation to demand	English courses integrated with other content (e.g. child care) designed to meet local community needs (e.g. associated with Community Hubs).
TAFE and Universities	ACSF 4 & above irrespective of arrival date	Foundation & enabling courses in preparation for various study pathways English in bridging programs for those seeking employment/registration in special employment areas (e.g. doctors, engineers, etc.)
	- below ACSF 4 - in Australia longer than six years	Special purpose English as a second/other language courses (e.g. improve employment prospects or meet higher level requirements, access to tertiary training & education). ⁴⁶

⁴² For a description of the ACSF, go to: <https://www.education.gov.au/download-acsf>

For a summary of ACSF levels, go to: https://www.cpsisc.com.au/Resources/CPSISC_WELL%20PD%20GUIDE%20ACSF%20Appendix%202.pdf

⁴³ Basic English = ACSF Pre-Level 1; Advanced English = ACSF Level 3.

⁴⁴ New arrivals = anyone registering in the first 24 months after arriving in Australia.

⁴⁵ https://www.sph.gov.au/Parliamentary_Business/Committees/Senate/Legal_and_Constitutional_Affairs/CitizenshipBill2017/Submissions

⁴⁶ Legislation currently before Parliament would make these programs full-fee.

APPENDIX E:

Proposed AMEP Tuition and Other Entitlements based on the Learner's ACSF Level and Previous Education

Research is conclusive that previous level of education is the most decisive factor impacting on adult second/other language learning rates of progress. Age is another important factor but its impact varies according to previous education.⁴⁹

ACTA teachers of adult migrants inform us that those with education equivalent to Australian Year 10 (approx.) normally take about two terms (200 hours x 2 = 400) or equivalent to achieve one ACSF level or equivalent.⁵⁰ The proposed AMEP entitlements in the table below are therefore calculated on a “norm” of 400 hours tuition per ACSF level with further hours added according to lower levels of education.

All entitlements should be **dependent on reports for every 200 tuition hours** (i.e. 10 week term or equivalent) on regular attendance and progress against ACSF indicators. Exact KPIs should be determined following consultation between providers and DET.⁵¹

Table 2: Criteria for determining AMEP and related entitlements

AMEP				
LEARNER GROUP	LEARNER CRITERIA	STARTING ACSF LEVEL	TUITION ENTITLEMENTS	CENTRELINK & OTHER SUPPORT
1.	- Aged 18+ - Schooling equivalent to Year 10 or above.	ACSF 0	400 hours x 3 = 1,200 hours	All support (child care; living allowance) dependent on provider reports to Centrelink on individuals' completion of every 200 hours.
		ACSF 1	400 hours x 2 = 800 hours	
		ACSF 2	400 hours	
2.	- Aged 18+ - Schooling equivalent to Years 4 -10.	ACSF 0 (a few people may be a little higher)	as per Group 1 <i>plus</i> a further 600 hours Total: 1,800 hours	
3.	- Aged 15+⁵² - Schooling less than Year 4	ACSF 0 (or 0 ⁻)	as per Group 1 plus a further 1,200 hours Total: 2,200 hours	

While these entitlements would increase overall AMEP costs, these would be off-set by a vast decrease in SEE Program costs because the many SEE clients are English language learners (but Problem 7.3 above).

In reality, most adult migrants stay in English classes only as long as they need to or until they find work. Exceptions are some elderly clients, so KPIs would need to distinguish between those making genuine progress, albeit it slowly, and those in classes in order to take advantage of living allowances.

⁴⁹ See ACTA submission 108, section 2.3 & 2.4 (pp. 34-40)

⁵⁰ AMEP teaching terms are normally 200 hours (= 4 hours x 5 days x 10 weeks) or equivalent. Some providers teach 6 hours for 4 days per week. ACTA members report that these hours are generally too long for learners to sustain concentration.

⁵¹ See Recommendation 9 (iii) in ACTA submission 108 (p. 18) and section 3.5.4 (pp. 87-90).

⁵² See problem 10 re refugee youth with minimal/no previous schooling; ACTA submission 108 sections 2.4, 3.6 & 4.4 (pp. 39-41, 94-104, 135-145)

APPENDIX F:

The Current Situation in the AMEP and SEE Program

The following comments were received from our members in response to a draft of this supplementary submission.

Insufficient AMEP hours for those with low levels of previous education:

Many adults stay at Prelim / Certificate 1 level as they struggle to develop literacy skills then their 5 years/510 hours run out.

Pathways blocked by SEE Program KPIs:

I think the biggest issue that is becoming apparent is the blocked pathways for those very low language learners who have finished their 510 hours. The SEE program requires that students be able to show capacity to benefit... they must be able to achieve a KPI in 2 areas every 200 hours. Funding is tied to these achievements so students who are deemed to be able to do this are not able to access the program. This means they have no options. These people need more assistance than many higher language learners. The benefits of being in a program are greater than the language and KPIs. What is the point of then coming from refugee camps just to have doors closed here? As TESOL teacher I find this very disturbing.

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

My students are migrants, some of 20 years and more, who have been deemed needing English language skills by Centrelink or the "job actives". (And they do). Applying a general language literacy and numeracy curriculum (Australian Core Skills Framework) is inadequate for ESOL. Also the lack of resources for these students (at least those made available by my organisation). Many of the students are women (Chinese, Korean, Pakistani, Somali...) who have been immersed in family and home management and just now have the opportunity to learn English. Some have been here a long time, some, for example, the Somalis, only in the last few years. ... Some of the students are just not going to be proficient. But I wonder if this is widespread: the assessments do not really reflect their abilities as the RTO has a KPI that 80% of the students pass their assessments. They don't. They never will. 80% is totally unrealistic.

The 'social English' stream:

The students who struggle may develop oral language skills (e.g. requesting goods in a transaction, responding to requests for personal information) but don't get opportunities to develop literacy skills. They don't require a "social stream" class they require a specific targeted literacy class.

Lack of alignment between educational and DET requirements:

I have no time for input on this proposal, too bloody busy making student files, mapping students at 200, 400 and exit to 4 learning area, 8 indicators, following up dots on rolls, checking why students are absent, marking attendance, writing excuses, doing all the paperwork. Hmm. ... we need to tick on decoding, predicting, guessing words from context, blah blah.

The burden on providers to suddenly create resources and spend extra money on staff without Department recognition of this is pretty poor. Over-assessment takes away from time teachers have to prepare and deliver real teaching to focus on learner needs. All of this over assessment is creating a lot of angst and disenfranchisement.

Many of my CALD learners had difficulty attending our SEE classes consistently and punctually because of their own serious health issues, because they were carers for family members who were ill or had school-aged children responsibilities (parents and grandparents). License conditions meant that each late-comer or absentee had to be questioned in person by the teacher, or receive a phone call later, for an explanation; every response had to be recorded on the learner's file. The amount of time that this one requirement took would make an interesting study, not to mention the disruption to class, the loss of lesson preparation time to admin time, and the strain on teacher-learner relationships.

Class sizes:

Having 20+ students in a class is not ideal for language learning as many students from a humanitarian and preliterate background require more attention and are not necessarily independent learners.

Reduced funding is pushing providers (at least our one) to utilise maximum number of students in a class set out in provider instructions. Having 20+ students in a class is not ideal for language learning as many students from a humanitarian and preliterate background require more attention and are not necessarily independent learners.

Participation in the increasingly digital society requires literacy skills (reading/typing). With an increase in student numbers there weren't enough computers for students to use or they required so much support to begin with that one teacher wasn't able to help students within the hour allocated to give them enough access and support.

Re disruptive effect of short-term contracts:

We dream of longer tender periods! Not to move at all would be good. Unless there was a problem with the quality of the service, why should it move? There has been so much waste in moving between providers. Wasted resources, paper, expertise, energy. Inefficiencies. Did I mention time...? How much has been saved by making changes?

I was working on a SEE Programme which finished recently due to an unsuccessful tender. As much as we tried to find organisations to take our resources, there was still such a lot of waste. As I sorted through my own bank of moderated and validated assessment tools, hours of ACSF, CSWE & CGEA PD, workshop notes\ and the like, it hit me how much would and could have been re-used, and that much of the accumulated knowledge that I had gained was being wasted. More than that, my students would have to start again with a new set of teachers in yet another new learning environment. My employer paid for me to train in Auslan (2 levels) because we had some hearing impaired learners in 'hearing' classes. Will those learners' new teachers do the training which I've already done? Short-term contracts mean waste and inefficiency.

The importance of non-employment related goals:⁵³

Personal and social goals can be as important as, or more important than, economic ambitions. Adults enrol in literacy courses to improve their self-confidence, to become better parents or grandparents, or as a stepping stone towards future lifelong learning goals. For adults of all ages, but particularly older ones, computer literacy provides a strong motivation for improving literacy skills. These adults recognise that the "digital divide" exists not just in the workplace, but within families and homes: grandparents who know how to use Facebook and email can more easily keep in touch with their grandchildren than those who do not, particularly in today's highly mobile world. There is evidence that recruitment messages focusing on other motivations – such as learning to benefit one's children or grandchildren – may help adults overcome or avoid the shame and taboos associated with poor literacy. Family literacy programmes, for example, provide parents with the strongest possible motive for participation: improving their child's chances in life.

⁵³ One of our members quoted this extract from the 2014 report of European Commission Working Group on Adult Learning as expressing a point she wanted emphasized.

http://ec.europa.eu/des/education_culture/repository/education/policy/strategic-framework/expert-groups/documents/adult-basic-skills_en.pdf p. 5

