



ACTA RESPONSE TO HOME AFFAIRS

Improving the AMEP - Request for feedback

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Abbreviations

ACTA	Australian Council of TESOL Associations
ACSF	Australian Core Skills Framework
AMEP	Adult Migrant English Program
AMES	Adult Migrant Education Services
ARMS	AMEP Reporting and Management System
ASQA	Australian Skills Quality Authority
CEP	Certificate in English Proficiency
CELTA	(Cambridge) Certificate in Teaching English to Speakers of Other Languages
CGEA	Certificates in General Education for Adults
CSL	Core Skills for Learning (Framework)
CSWE	Certificates in Spoken and Written English
DELTA	(Cambridge) Diploma in Teaching English to Speakers of Other Languages
DL	Distance Learning
EAL	English as an Additional Language (Framework)
EAL/D	English as an additional language/dialect
ESL	English as a second language
FSK	Foundation Skills (Training Package)
KPI(s)	Key Performance Indicator(s)
LWA	Linda Wyse & Associates
NEAS	National ELT (English Language Teaching) Accreditation Scheme (Ltd.)
NBM	New business model
NSW	New South Wales
PD	Professional development
QA	Quality Assurance
RTO	Registered Training Organisation
SA	South Australia
SEE (Program)	Skills for Education and Employment (Program)
SLPET	Settlement Language Pathways to Employment and Training
SPP	Special Preparatory Program
TAE	(Certificate) in Training and Assessment
TAFE	Technical and Further Education (Institutes)
TESOL	Teaching English to speakers of other languages
VET	Vocational Education and Training

Executive Summary

ACTA welcomes and fully endorses the Home Affairs *Vision Statement* for the AMEP.

The *Request for Feedback* poses a number of specific questions. However, answering them has required repeated reference to fundamental issues. ACTA's recommendations address these issues.

In summary, these recommendations are:

- 1) **The content and structure of the AMEP** should be governed by the goals articulated in the Home Affairs *Vision Statement*, viz. “enabling migrants learn English so they can participate socially and economically in Australia.”
- 2) These **goals and their associated curriculum content** should govern English language assessments in the AMEP.
- 3) The AMEP should return to delivering **one national curriculum** that re-focuses effort and resources on developing teaching materials and assessment tasks, and the development of **an array of options within that common framework**.
- 4) The **provider payment system** should return the AMEP to delivering tuition governed by the essential criteria for the effective formation of class groups (viz. relatively homogenous English levels and previous education) and should encourage responses to the particular needs of different learner cohorts.
- 5) **Provider and teacher initiative** should be encouraged in responding to student needs – in contrast to the top-down, inherently inflexible imposition of various tuition options.
- 6) The highest standards of **teacher professionalism** should be required, including specialist TESOL qualifications and opportunities for professional development such as the annual AMEP teachers' conference
- 7) **Eligibility for the AMEP should be simplified and streamlined**, and therefore based on one single criterion, viz. adult migrants who are assessed by qualified TESOL assessors as having *less than the level of English proficiency necessary for entering mainstream education and training* (including bridging programs).
- 8) The current **disruptive, wasteful, ineffective and inefficient method of contracting for the AMEP** should be replaced by a more cost-efficient, targeted, independent and effective review and rating system for evaluating providers (as described in previous ACTA submissions) to determine whether and under what conditions contracts should be renewed, terminated or tendered for.

These changes are necessary for realising the commitments in the Home Affairs *Vision Statement*. These are also pre-requisites for making the AMEP cost-effective, efficient, productive and capable of delivering credible outcomes.

Recommendations

To remove the fundamental barriers to engaging and retaining clients:

1. The Commonwealth should streamline English language provision for adult migrants and the current complex and counter-productive eligibility requirements attaching to the AMEP and the Skills for Employment and Education (SEE) Program.

That is:

- i. a straightforward, pathways-oriented, evidence-based and coherent criterion based on English language proficiency should replace the AMEP's restriction to adult migrants with less than "functional English"; instead –
 - ii. the AMEP should be the Commonwealth's English language program for adult migrants whose English proficiency is below the level required for entry to mainstream VET and Higher Education bridging courses.
 - iii. other arbitrary, non-evidence-based restrictions should be removed, viz. length of tuition (510 hours with various complex and overlapping extensions) and time allowed for registering for the AMEP.
 - iv. the SEE Program should be returned to meeting the needs and aspirations of English native speakers and adult migrants with near-native oral English fluency but whose literacy and numeracy are impeding their ability to gain employment.
 - v. the Commonwealth should review current English language and literacy provision for Indigenous speakers of languages other than English and dialects other than Standard Australian English.
2. The current method of contracting for the AMEP must be replaced by a system that creates continuity of provision and learner access and the necessary stability for long-term planning, building collaborative networks and innovation.
 3. The next round of AMEP contracts should be determined using a rating system to evaluate existing provider performance (along the lines described in previous ACTA submissions). These evaluations should be undertaken by an independent expert evaluator and should determine whether and under what conditions existing contracts should be renewed or terminated (and therefore new tenders invited).
 4. The current QA provider should not be considered for this role because they are implicated in the history of the problems now afflicting the AMEP and have conflicted interests.

To enable the delivery of more flexible tuition, including beyond traditional classroom (such as in applied situations, in the community and in workplaces):

5. Before any major commitment is made to specific modes of more flexible delivery, provider-initiated pilot programs should be trialled and independently evaluated.

To better meet the needs of specific cohorts in the AMEP:

6. The current method of AMEP provider payments based on student hourly attendance should be ended immediately.
7. Quality Assurance procedures for the AMEP should immediately be re-directed to include rigorous checking that classes are formed and staffed in relation to learners' English proficiency levels, previous education and, where possible, their specific learning needs and aspirations (e.g. refugee youth with minimal/no previous schooling) – as distinct from being governed by ensuring a minimum of 16 students per class irrespective of any other criteria.
8. A payment system should be installed which:
 - i. allows providers to experiment with different types of provision for different learner groups,
 - ii. does not attract financial penalties for well-grounded experiments (including failures), and
 - iii. gives some scope for different class sizes to meet specific student needs and aspirations.
9. Top-down mandates regarding the formation of specific types of classes, hours for classes, full/part-time options and other initiatives to achieve flexibility should be avoided.

To improve web-based delivery in the AMEP:

10. A single provider (or consortium of providers) should be contracted to *produce* DL resources on a long-term, stable basis. Contracts should be allocated and provider performance reviewed as per Recommendations 2-3 above.
11. Local providers should be contracted to *deliver* DL tuition.
12. The current method of DL provider payments should be reviewed with the aim of making this provision cost-effective for providers and encouraging enrolments by students who would genuinely benefit from it.
13. Any web-based component of the AMEP should be developed within an overall approach to and support for DL.

To ensure that AMEP teachers are adequately and appropriately qualified:

14. The Department of Home Affairs should require all teachers employed by AMEP providers to hold:
 - i. a recognised Bachelor degree or higher, i.e. a formal qualification awarded by an Australian university or tertiary institution, or its onshore or overseas equivalent, that is at least three years full-time in length or its part-time equivalent;
and
 - ii. a recognised postgraduate TESOL qualification or TESOL major in an undergraduate degree, resulting from a course of study in which course content of no less than 100 contact hours (or a distance learning equivalent) covers the grammar of the English language, how English is learned as an additional language, TESOL methodology and includes a supervised teaching practicum of at least 60 hours.

Quality Assurance should include monitoring compliance with this requirement.

15. Any requirement for qualifications in adult education should be met by:
 - i. a single unit or equivalent that covers adult learning *within* or *in addition to* a TESOL qualification at Certificate level or above
or
 - ii. a practicum that includes supervised TESOL experience with adults
or
 - iii. teaching adults under supervision in the person's workplace (concurrently with employment) for at least 60 hours by an experienced and qualified TESOL teacher.
16. The Department of Home Affairs AMEP team – in consultation and collaboration with stakeholders (including providers and ACTA) – should initiate discussion with the Australian Skills and Qualifications Authority (ASQA) with a view to determining more appropriate and targeted RTO and course accreditation requirements or exemptions for AMEP teachers, including exempting AMEP teachers from the TAE Certificate IV in Teaching & Assessment, given that they hold teaching qualifications at higher levels.
17. Further work should be done to determine appropriate bridging requirements, if any, for those seeking to teach in the AMEP and who hold Bachelor's degrees (or higher), plus the Cambridge Certificate in TESOL, the Cambridge Diploma in TESOL or the Trinity TESOL Certificate.
18. The NEAS scheme for endorsing TESOL qualification providers should be investigated and consideration given to how it might be adopted/accepted for future AMEP teachers.
19. The Department of Home Affairs should use whole-of-government channels to pursue the problem of the high cost of fees for post-graduate professional qualifications in areas of social and economic need, such as TESOL, where opportunities to recoup these costs through later salaries are limited or non-existent.
20. The Department of Home Affairs should maintain an annually updated data base on the number of teachers delivering AMEP classes, the type of contracts on which they are employed and resignations.
21. Evaluation of tenders for AMEP contracts should allow for salary incentives to attract qualified TESOL teachers to rural and regional Centres.

To re-establish quality provision and innovation in the AMEP:

22. The financial allocations currently supporting the ACSF (assessment task development, training teachers and provider audits) should be re-directed to include a comprehensive approach to professional development in the AMEP.
23. The annual AMEP teachers' conference should be re-instated.

To re-establish high quality AMEP provision; its outstanding national and international reputation; design and delivery that is supported by evidence based policy on teaching and adult learning, English as an additional language, digital literacy, numeracy and settlement; a strong quality assurance and performance framework to underpin the Program; and outcome data that can be used for continuous improvement:

24. The Commonwealth should move as quickly as possible in the direction of re-instating *one* national, fit-for-purpose, well-supported AMEP curriculum *within which* options/pathways are developed to support comprehensive and flexible responses to diverse learner needs and aspirations.
25. The task of developing, seeking ASQA accreditation for and supporting this curriculum should be put to tender and allocated to one quality provider (or provider consortium) with proven experience in TESOL curriculum development. The success of this recommendation would depend on long-term stability in this contract, as per our Recommendation 2 above.
26. As a basis for this move, the Commonwealth should acquire the CSWE licence from TAFE NSW. (The likely basis for the new national curriculum is the CSWE, since – despite its recent impoverishment to meet ASQA requirements – it rests on on-going development and refinements from the late 1980s onwards.)
27. The provider awarded the task of developing the national curriculum should be required to consult extensively and in-depth with:
 - i. all other AMEP providers
 - ii. individual experienced and expert AMEP teachers (current and/or previous)
 - iii. the Advisory Committee recommended in the AMEP Evaluation
 - iv. independent experts in TESOL curriculum and assessment, and
 - v. representatives from teacher education faculties universities that deliver quality TESOL teaching qualifications (see Recommendation 14 (ii) above).

A Steering/Advisory Committee should be formed from i-v above to provide a stable source of guidance and feedback for this work.

28. AMEP providers should retain the option of choosing alternative curriculum on the understanding that they must support it from their own resources.
29. The national curriculum and associated resources should be available without charge to all AMEP providers, and on request to TAFE institutes, Government schools and university TESOL teacher education faculties.
30. The national AMEP curriculum should be the basis for *any further* Commonwealth investment in developing assessments of learners' English proficiency.
31. Curriculum goals/outcomes and related learning should drive teaching in the AMEP, not any superimposed assessment framework.
32. Assessments of learner attainment in the AMEP should be based on assessments of their progress in achieving the outcomes described in the national curriculum. (As an interim measure, which should be instituted immediately, these attainment assessments should be based on progress in the curricula currently taught by providers.)
33. AMEP teachers and provider managers should not be required to undertake double assessments of learner attainment. The current inefficient requirements for double assessments should cease *immediately*.

34. In regard to curriculum and assessment, the priorities for Commonwealth financial investment should be:
- i. moving towards one national AMEP curriculum
 - ii. resources to support valid and reliable assessment *tasks* drawn from that document learner progress in achieving learning outcomes specified within the options and pathways of that curriculum,
 - iii. materials development that supports the national curriculum and options within it,
 - iv. resources to support the AMEP's broad settlement goals, which include but go well beyond gaining employment, and
 - v. professional development that enhances actual *teaching* in the AMEP.

To facilitate the achievement of important non-language outcomes in the AMEP through reporting and other means:

35. Home Affairs should develop and trial a Client Satisfaction Survey for use by providers on a term-by-term basis, which draws on the non-language dimensions of AMEP provision identified in the Social Compass Evaluation and other sources. The data from these surveys should be available to providers and teachers with all necessary limitations to protect respondents' identities.
36. In addition and over a longer time frame, Home Affairs should commission the development of a variety of questionnaires for AMEP students at the beginning and later in AMEP courses, which probe the development of important cultural competencies.
37. Professional development opportunities for AMEP teachers should include how to incorporate within their teaching important cultural competencies and strategies for encouraging students' tolerance of different faith and world views.
38. *On no account* should the results of the above (30-32) relate to any KPI.
39. A more comprehensive Counselling service should be re-introduced to the AMEP.
40. QA audits should include scrutiny of how volunteers are utilised in AMEP venues (teacher support/ whole class teaching/ other duties) and off-site.
41. QA audits should be directed to determining, preventing and reporting on any use of volunteers as whole-class teachers.
42. Volunteers should not be subjected to arduous compliance requirements.
43. Volunteer training and support packages should be reviewed and upgraded where relevant.
44. Options for on-line volunteer training and support should be explored through DL provision. However, initial training should always be face-to-face.

To facilitate better collaboration with other providers and community groups in order to assist with students' settlement journeys:

See Recommendations 1 – 3 and 6 – 9 above.



The Australian Council of TESOL Associations (ACTA) warmly welcomes the request by the Home Affairs AMEP team for our feedback on its *Vision Statement* and questions that follow the release of the Social Compass Evaluation and the Shergold report.

A draft of this submission was circulated for comment to ACTA Councillors and the extensive ACTA mailing list of AMEP and SEE Program teachers and managers, and TESOL researchers and teacher educators. This final version has incorporated their responses and endorsements.

1. The Vision Statement

ACTA wholeheartedly supports all the principles articulated in the *Vision Statement*.

We are also pleased that such a Statement has been developed, especially given the absence of such clarity since the 2015 ACIL Allen Review.

We applaud the broad goal set for the Program, namely, that it aims to help “eligible migrants learn English so they can participate socially and economically in Australia.”

We note that, in contrast to the ACIL Allen Review, assisting “settlement” is specifically mentioned only in the context of an aspiration to “High Quality”:

Design and delivery is supported by evidence based policy on teaching and adult learning, English as an additional language, digital literacy, numeracy and settlement.

ACTA would be profoundly disappointed if this limited reference to “settlement” signifies a continuation of the current:

- (i) almost exclusive focus on employment-related content
and/or
- (ii) confusion of *learning English* with *learning literacy*, as understood in VET sector Foundation Skills courses.

In regard to (i): the AMEP should be – and has always been – focussed on but not confined to enhancing employment outcomes for learners.

In regard to (ii):

- Foundation Skills courses do not address the learning needs of English language learners
- many English language learners are highly literate and numerate – they do not require Foundation Skills courses but rather English language tuition that utilizes their literacy skills to learn the new language
- those with minimal/no previous formal schooling face a huge challenge in gaining literacy, numeracy and other knowledge and skills *simultaneously with* learning English as their new language – this requires very particular teaching from highly qualified, specialist TESOL teachers, not Foundation Skills courses that assume prior oral fluency in English.¹

However, rather than perpetuating the current misdirection of the AMEP, the *Vision Statement* appears to signal its reversal, especially in its commitment to meeting “*the needs of all eligible*

¹ For an indication of proportions of these different learners in the AMEP, see the Social Compass Evaluation report, p. 15. We note the relatively high proportion of tertiary educated focus group participants.

students regardless of their gender, age, family commitments, employment status or location” and to “design and delivery supported by evidence based policy” including on “teaching and adult learning, English as an additional language.” ACTA warmly welcomes these commitments.

We are therefore optimistic that the reference to “settlement” within a set of broad aspirations will open the door to remedying fundamental problems that have undermined the AMEP since 1992, viz.:

1. the **restricted eligibility requirements** that currently govern access to the AMEP
and
2. the consequent wasteful, inefficient, dysfunctional and complicated **relationship of the AMEP with the Skills for Education & Employment (SEE) Program.**

These problems are the key factors that have contributed to the Shergold Report’s unwarranted and misguided conclusion that the AMEP has “failed to deliver” because “too few participants” achieve “functional English” (p. 38).

The Shergold criticism confuses an AMEP *eligibility criterion* with the Program’s *goals*. In fact, the goal of bringing students to a given proficiency level has *never* been articulated for the AMEP. ACTA has repeatedly advocated for espousing precisely such a goal, as will be seen in Recommendation 1 below.

We note that the *Vision Statement’s* commitment to “High Quality” includes the following:

- *The program is underpinned by a strong quality assurance and performance framework.*
- *Outcome data is used for continuous improvement.*

An effective and efficient data management system would be crucial to meeting these commitments. The opposite is currently in place, as noted by the Social Compass Evaluation report:

*The implementation of several elements of the NBM was hindered by **the absence of an information management system (IMS) capable of accommodating the changes to the program.** During the consultation period of the evaluation a new IMS was in development, but interim arrangements have been complex and cumbersome. To adapt to new data collection and reporting requirements, the department supplemented the existing AMEP Reporting and Management System (ARMS) with a system of spreadsheets. This interim solution has increased workloads for the department and service providers.* (p. 23; our emphasis)

The Evaluation recommended that “*the department should prioritise the development of a robust information management system (IMS) to manage the AMEP.*” ACTA strongly endorses this recommendation. **The current error-prone, inefficient and time-consuming way in which data is reported is untenable.** It is a mess, not a “system”. We are gravely concerned by the current estimate that the proposed system (costing \$4.5 million) will not be in place until mid-2020.²

Given that the new system is/was intended to align AMEP and SEE Program data, our concern is intensified by the separation of these two programs into two different government departments. An obvious solution to this aspect of the problem can be found in our Recommendation 1 below.

Regarding “continuous improvement”, we note that the Evaluation recommended the establishment of an AMEP Advisory Committee (Recommendation 7) whose duties would include collaboration with the Department “*to develop continuous improvement strategies for service providers to implement*” (p. 74). ACTA strongly endorses this recommendation and its proposed membership (most especially the inclusion of teachers nominated by State/Territory professional associations. p.23).

² Question on notice no.295, Portfolio question number:SQ18-000999, 2018-19Supplementarybudgetestimates Education and Employment Committee, Education and Training Portfolio; Senator the Hon. Doug Cameron 25October2018

The remainder of this submission addresses the questions posed in the Home Affairs request for feedback.

2. Student Attendance

2.1 What are the barriers to engaging and retaining clients?³

The barriers faced by adult migrants who do not engage with the AMEP are probably similar to those affecting retention.

The recent ACTA survey of teachers and managers provides some insight into reasons for not completing tuition entitlements. ACTA is not aware of any comparable data set. These data, including respondents' comments (which are illuminating), are presented in full in Attachment 1.

A total of 560 responses identified two main reasons for non-completions:

- (i) family pressures
- and*
- (ii) gaining employment.

Other reasons provided in respondents' comments include:

- student dissatisfaction with mixing very different English and educational backgrounds in one class
- the excessive focus on assessment
- students leaving to visit the home country.

Worth noting is one comment that Centrelink payments are an incentive to attend AMEP classes.

ACTA's evidence is supported and extended by data from the Social Compass focus groups:

*Students identified challenges that affect their capability to learn and participate in the AMEP, including **gendered expectations** and **the need to find employment**. There were also a number of challenges **specific to particular age groups and visa streams**. The impact of **poor health, including trauma**, on the ability of humanitarian migrants to learn was prominent. (p. 21; our emphases)*

The Evaluation report identified the following as critical factors challenging or enabling engagement in the AMEP (p. 19):

- access to transport
- access to child care
- the classroom environment
- teacher quality
- the opportunity for teachers to build "strong and supportive relationships with students"
- student motivation.

Further:

*Students acknowledged the AMEP teachers as **the single most important factor** that supported their learning. (p. 21; our emphasis)*

We also note that the option of students completing their AMEP entitlements via Distance Learning (DL) ended with the current contract and contributed to the decline in enrolments (Social Compass Evaluation report, p. 47).

³ For research and strategies on improving engagement & retention, see also
http://www.ameprc.mq.edu.au/docs/research_reports/research_reports/Book_two_Retention.pdf
http://www.ameprc.mq.edu.au/docs/fact_sheets/Misc_Retention.pdf

Low rates of engagement and retention in the AMEP are not new issues. They have been canvassed in every review of the AMEP since at least 2003.⁴

Decisive evidence regarding barriers to engagement and retention is found in the Evaluation data on the **transition between new contracts**:

*AMEP enrolments ... were substantially lower in 2017-18 compared to both 2016-17 and 2015-16. This lower enrolment number is partly due to a significant number of AMEP students who did not continue in the program after the transition to the NBM. There were **many service providers who changed and significant numbers of students did not transfer to the new providers**. The lower enrolment number is also due to the spike in the number of humanitarian migrants returning to usual levels as the 12 000 additional Syrian and Iraqi refugees accepted to Australia worked their way through the system.*

*The impact of the transition to the NBM can be considered in terms of student retention. As Figure 8 shows, **the proportion of students that enrolled under the previous contract and continued in the AMEP under the NBM in 2017-18 was 56 per cent**. This is lower than for all previous years in the dataset (when it was about 62 per cent). However, student retention from the first to the second year improved to 60 per cent in the first six months of 2018-19, indicating a return to pre-NBM levels of student retention. (our emphasis, p. 12)*

While the specifics of the “new business model” appear to have impacted on continuations and engagement, the real message here is the decline in enrolments associated with provider changes under new contracts. The switch to the current contract saw **46 per cent of those previously enrolled either discontinuing or not replaced by new enrolments**. The previous switch had the same effect – **a drop of 38 per cent** – although not to the same extent. (See also section 2.4 on Distance Learning). The Notes from the ACTA Sydney Forum on the AMEP Evaluation paint a clear picture of the impact on students and associated disruption:

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

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

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

As ACTA has long argued, the current method of allocating contracts is wasteful, disruptive, ineffective and inefficient. This issue impacts on almost all the questions that Home Affairs has posed.

Despite repeated recommendations and promises that transitions between contracts will be improved, history shows that this hope is in vain. In 2001, the Australian National Audit Office recommended:

⁴ See p. 266, DIMIA, May 2003. *Report of the Review of Settlement Services for Migrants and Humanitarian Entrants. Commonwealth of Australia*. Defending the 510 hour tuition limit, this report also states that “even if there was a significant increase in the number of learning hours available to clients, it would be unrealistic to expect that all clients would achieve functional English” (p. 263).

that DIMA [= the Department of Immigration & Multicultural Affairs] improve strategic management and coordination for the AMEP to more effectively manage contracts, administration and outputs by: • systematic planning for contract succession to ensure that there is a smooth, efficient and effective transition at the end of the contract for either an extension of the existing contract with any revised service levels, or for selection of a new provider.⁵

Nearly twenty years later, this problem has yet to be solved.

The evidence above offers *no* support for continuing the approach to promoting class attendance in the current “engagement” KPI. This KPI has instituted time-consuming practices that are also punitive, demeaning and personally invasive for both students and teachers. This KPI (along with the way teachers and students are now named) has also undermined “strong and supportive” teacher-student relationships” that the Evaluation found to be so important. This response from the ACTA survey details how this KPI operates:

Most of the attention in my centre has been on attendance growth and engagement of the students to help increase the profit of the company. There are a lot of pressures on the students (whom we were asked to call customers and I avoid it) to attend the assigned hours in the classroom. On the first day of commencement of studies, the teachers (who are called trainers by the company) should provide their personal mobile numbers to the students. Then students asked if they cannot make it any day for any reason, they must call the teacher and let them know, otherwise the reason that will be put on the attendance sheet will be “unspecified” and that is going to affect student's Centrelink payment negatively to the point that their payment will be stopped. If students do not call/text the teachers to inform them that they cannot make it, the teacher is expected to call and ask them why they are not attending and remind them of the regulations again and again. Some teachers go too far and they say they do not trust their students when they give a reason for their absence. This has all been the pressure of management to make sure no student is left with a reason as Unspecified in the attendance sheet so it does not affect profits negatively. ... I am so dissatisfied with constantly chasing students in their private lives to find out about their attendance and the reason why they were absent. They are adults and migrants dealing with all kinds of problems in their lives, so it seems unfair to behave towards them as if their English class is the most important part of their life.

Evidence from the Evaluation, previous reports and ACTA is clear that a narrowly focussed, top-down, compliance-oriented approach will not reverse the low engagement and retention rates in the AMEP. Successive reports and policies have attempted to address this issue by tweaking different aspects of the Program and its KPIs. The latest round of “fixes” has, in fact, been accompanied by the declines in engagement and retention just noted.⁶

Yet another “fix” is suggested in the Social Compass Evaluation, viz. that the Department “*consider development of a KPI to measure and encourage service provider recruitment activities*” (p. 74). ACTA is in favour of assisting providers to undertake limited and appropriate recruitment activities, for example, special funding for Open Days. However, **we strongly oppose the development of a KPI related to provider recruitment activities.** Such a KPI would encourage pointless expenditure on glossy advertising and other marketing activities, as has happened in the school & ELICOS sectors. It would require developing marketing expertise that providers currently lack and should not be required to gain. It would install perverse incentives to boost enrolments but would inevitably increase discontinuation rates.

Given that the reasons for migrants’ participating in the AMEP are largely beyond providers’ control, encouraging them – including with well targeted information at optimal times and in relevant venues – is **a Commonwealth Government responsibility.**⁷

⁵ The Auditor-General (2001). *Management of the Adult Migrant English Program Contracts*. Audit Report No.40 2000–2001, Performance Audit. Australian National Audit Office 2001, recommendation 2, p. 28.

⁶ Social Compass Evaluation, section 3.

⁷ See, for example, the 2017 Report of the Inquiry into Migrant Settlement Outcomes, para2.18-2.21, pp. 10-11.

It is time for the Government to decide whether it actually wants to increase engagement and retention in the AMEP. If so, the realities that underpin participation must be addressed. Alternatively, the Government can (and will) continue to use the Program as a scapegoat to distract from these issues, as the Shergold report exemplifies.

The Home Affairs *Vision Statement* rightly indicates that learning English is crucial to increasing newcomers' self-reliance, supporting their families, being active members of the community, and getting a job or further training. However, as recognised in the quote above, other aspects of life will determine *whether, when and how* individuals are best able to take up this challenge.

Key constraints (notably child care and transport) must be addressed. More fundamentally, for Government to predict and therefore regulate **the time frame for access to the AMEP** simply installs a major barrier to access.

Those seeking to learn English are also deterred and blocked by the maze of eligibility restrictions that apply to **different and duplicated English learning pathways and programs** such as the AMEP (and extra tuition within it), the SEE Program and State-funded schemes. They are discouraged by inconsistent and arbitrary determinations of eligibility by different providers (and even within a given provider – see Evaluation report, p. 32) and external authorities such as Centrelink. Now that the SEE Program and AMEP are administered by different departments, an increase in these problems seems likely.

A commitment to increasing engagement and retention in the AMEP requires access that is genuinely open, flexible and easily navigated.

Such access may well permit cost savings. It will certainly allow more efficient and targeted use of resources. We note, for example, that the 2017-18 AMEP Extend budget was underspent: the Evaluation reported that **although providers believed funding was insufficient, only 62% of the 2017-18 capped funding was expended** (p. 32). It also reported complaints by students and teachers that decisions on eligibility for AMEP Extend were inconsistent and unfair, a finding confirmed by the ACTA Adult ESL Working Party members.

An Evaluation Key Finding was also that:

Duplication of assessments for students transitioning from AMEP to SEE and insufficient funding for SEE are two key issues preventing better alignment between AMEP and SEE. (p. ?)

The reason for duplicated assessments is that the AMEP contract requires an exit assessment and the SEE contract requires an entry assessment. Given that this duplication continued when both Programs were administered by the same department – and this department was expressly committed to aligning the two programs – its end seems unlikely now these programs are separately administered in two departments.

This duplication of effort and resources has been consistently under review. Although the 2015 ACIL Allen Review strove to justify the separation of these two programs (to which a whole volume was devoted), the evidence it presented could be equally used to argue for the opposite.

Administering the entitlements governing access to the AMEP and SEE Program requires time-consuming administration and data management, dealing with complaints and rectification of numerous and inevitable errors. This work is done (and duplicated) by teachers, provider managers

and Commonwealth Government officials in Home Affairs, Education and Centrelink. Because management of these complexities is never fully costed, it is impossible to tell what savings, efficiencies and improved outcomes would follow if entitlements were simplified, streamlined and directed to clearly defined and realistic program goals.

An evidence-based approach would regulate AMEP access using two simple criteria:

(i) English proficiency level

and

(ii) student demonstration of commitment to learning at any given point in time (by attendance and progress, both monitored non-punitively) – this criterion would include options of returning to the AMEP when personal circumstances are more favourable.

ACTA believes that problems in adopting this approach could be resolved. These relate to support payments (including deterring their exploitation), child care and retaining legislative protection for tuition entitlements. ACTA would welcome the opportunity to explore solutions with the Home Affairs team.

The above principles govern the recommendations below, which ACTA has repeatedly made. These recommendations offers the *only* way forward to a genuine increase in participation in the AMEP.

To remove the fundamental barriers to engaging and retaining clients:

1. The Commonwealth should **streamline English language provision for adult migrants and the current complex and counter-productive eligibility requirements** attaching to the AMEP and the Skills for Employment and Education (SEE) Program.

That is:

- i. a straightforward, pathways-oriented, evidence-based and coherent criterion ***based on English language proficiency*** should replace the AMEP's restriction to adult migrants with less than "functional English"; instead –
 - ii. the AMEP should be the Commonwealth's English language program for adult migrants whose English proficiency is **below the level required for entry to mainstream VET and Higher Education bridging courses**.
 - iii. other arbitrary, non-evidence-based restrictions should be removed, viz. **length of tuition** (510 hours with various complex and overlapping extensions) and **time allowed for registering** for the AMEP.
 - iv. the SEE Program should be returned to meeting the needs and aspirations of **English native speakers and adult migrants with near-native oral English fluency** but whose literacy and numeracy are impeding their ability to gain employment.
 - v. the Commonwealth should review current English language and literacy provision for Indigenous speakers of languages other than English and dialects other than Standard Australian English.
2. The current method of contracting for the AMEP must be replaced by **a system that creates continuity of provision and learner access and the necessary stability for long-term planning, building collaborative networks and innovation**.
 3. The next round of AMEP contracts should be determined using a **rating system** to evaluate existing provider performance (along the lines described in previous ACTA submissions). These evaluations should be undertaken by an independent expert evaluator and should determine whether and under what conditions existing contracts should be renewed or terminated (and therefore new tenders invited).
 4. **The current QA provider should not be considered for this role** because they are implicated in the history of the problems now afflicting the AMEP and have conflicted interests.

2.2 How could tuition be delivered more flexibly, including beyond the traditional classroom, such as in applied situations, in the community and in workplaces?

Any number of flexible tuition options can be proposed. However, previous experience with programs such as the Workplace Language and Literacy Program (WELL) and the current SLPET⁸ show that developing and sustaining them is expensive and time-consuming. It requires commitment and persistence by both external actors (such as employers) and AMEP managers and teachers.

Building the necessary networks and collaborative relationships is difficult – if not impossible – when provider contracts can be terminated irrespective of the success of carefully developed and well-sustained arrangements. The experience of AMES Australia in the allocation of the 2017-2020 contracts provides a clear case in point.

Before embarking on initiatives that are determined from the top down, ACTA sincerely hopes that the Home Affairs AMEP team will consult *in depth* with experienced practitioners who are or who have previously delivered flexible learning options, including WELL and SLPET. The recovery of research done by the now-defunct AMEP Research Centre would, no doubt, provide further insights.

To our knowledge, the most successful flexible tuition options combine classroom tuition on some days in the week with work or other experience on others.

Encouragement of “outreach” classes should take heed of the cautions provided by this example from the ACTA survey:

The outreach area where I am teaching is part of a church and it is used as childcare for the church on the days that we are not using it. It has only 2 toilets, one for a male adult and the other one for a female adult. Students and teachers are using the same toilet. The heating and cooling system is awful. All over winter we were all freezing in that big room with all the heaters on. I used to give few minutes time to the students every now and then to get up and move around and go to the sunny area to warm up. There is no proper desk and chair for teachers. With the cold weather inside and improper facilities, I developed long-lasting pains all over my shoulders. One of my students who had both her knees replaced had to bring her electric blanket to warm up her knees because cold was so damaging to her body. There is no staff room at outreach. There are no recreational facilities inside or outside the class either at outreach or main sites.

Short-term, ad hoc, top-down, cost saving initiatives will not produce flexible learning options for adult migrants. These options flow from encouraging innovation and building networks, both of which depend on a stable, long-term vision and commitment, as we elaborate in section 6 below. See also Recommendations 2-4 above.

ACTA further recommends as follows.

To enable the delivery of more flexible tuition, including beyond traditional classroom (such as in applied situations, in the community and in workplaces):

5. Before any major commitment is made to specific modes of more flexible delivery, **provider-initiated pilot programs** should be trialled and independently evaluated.

⁸ SLPET = Settlement Language Pathways to Employment and Training.

2.3 How can the AMEP better meet the needs of specific cohorts?

2.3.1 FUNDAMENTAL REQUIREMENTS

The needs of *all* the special cohorts listed in the Home Affairs question would be better served by **eliminating the current time-based restrictions on registering for and accessing the AMEP**, as per our Recommendation 1 above. As we have argued, adult migrants – and especially those named in this question – are themselves best placed to determine the optimal time to engage productively in learning English. It is fruitless for Government to attempt to predict and regulate this timing. As one response to a draft of this submission stated:

It's a waste of time and resource if you have someone in class with undisclosed and/or untreated trauma surrounded by migrants with an employment focus.

The current method of allocating contracts does not facilitate tailored responses to needs and aspirations of specific learner cohorts. The Evaluation found that “*the competitive tendering environment, with cost as a key criterion, discouraged providers from [offering smaller classes]*” and that “*tailored learning*” for students has reduced (pp. 28, 102). It was on this criterion that AMES Australia’s exemplary provision for refugee youth was terminated in 2017.⁹

Provider payments by hourly student attendance do not permit flexible tuition options or meeting the needs of specific cohorts. As ACTA has repeatedly documented, the financial penalties attaching to class sizes of less than 16 students disallows forming classes *even to meet the most basic criteria* – viz. students with relatively homogenous English levels and previous education – much less classes that address particular needs. For example, the current payment methods have led to Melbourne Polytechnic’s determination that youth classes in Broadmeadows and Preston were no longer viable. (Four classes were also vulnerable but continue at their Epping campus.) As a respondent to the ACTA survey wrote:

Special needs classes would have fewer than 10 students in them so they would be smaller than the maximum allowed and the priority is to achieve this maximum. We already split classes into Social English and Pre-Employment, so forming classes in other ways isn't viable. Our provider's policy is not to consider special needs.

The first step in meeting different cohorts’ needs would be **a payment system that encouraged (rather than prevented) class groupings according to English language level and previous education.**

More flexible class times/hours and days would assist in meeting the needs of some of the specific groups named in the question, assuming reform of the current payment system. Removal of the requirement to stream students will also increase the potential for more flexible offerings.

Greater support for the Distance Learning Program and Volunteer Tutor Scheme (see 2.3.3 and 5 below) would assist people who are housebound, especially women.

2.3.2 SPECIFIC GROUPS

Some of the groups listed in the question have quite particular needs.

- (i) **Students who are highly literate in their first language and/or highly qualified:** for an example of successful provision, see pp. 5-6 in the submission from AMES Australia to the 2017 *Parliamentary Inquiry into Migrant Settlement Outcomes*, which is attached for your convenience.

⁹ For a description of this program, see ACTA submission to the 2017 Parliamentary Inquiry into Migrant Settlement Outcomes, section 4.4, pp. 140-142.

- (ii) **Students who are illiterate or have had limited schooling in their first language:** for crucial considerations that should govern provision for these learners, see the ACTA submission to the same Inquiry, sections 2.4 (pp. 39-40), 3.6 (p. 94 ff.) and 4.4 (p. 135ff), also attached for your convenience.¹⁰ We note the Evaluation finding that:

The removal of the cap on maximum class size [previously 12 students] and the removal of the higher SPP pricing has resulted in larger class sizes and almost no specialised classes for SPP students. (p. 28)

At the time of writing the Evaluation Report, **there were only five SPP-specific classes across the AMEP.**

- (iii) **Women:** child care is clearly crucial to increasing women's access to the AMEP. ACTA endorses further exploration with providers of the findings and recommendations on child care in the Social Compass Evaluation (p. 79). Transport is also a particular issue for some women, even more so in regional areas.¹¹ Teaching resources that specifically targeted the needs of some women could be recovered.¹² Increased investment in the Volunteer Tutor Scheme, including tutor training, would assist women (see Evaluation report, p. 80).

- (iv) **People with health conditions and disabilities:** We have no particular information on the special needs of these diverse groups. We understand that providers and teachers feel ill-equipped to meet their needs. We are also aware that cost-shifting has occurred through the tendering process: TAFE providers do not cost their institution's support for these groups in order to compete with private providers who do not offer these services.

We assume that the Home Affairs team will seek specialist input from relevant advocacy and expert organisations on meeting these learners' particular needs. The physical facilities described in numerous responses to the ACTA survey would suggest that attention to these basic issues would assist these groups:

- access to buildings and classrooms
- adequate toilet facilities
- ventilation and heating
- adequate seating and desks.

As per our Recommendation 5, Quality Assurance should be directed to ensuring that facilities meet acceptable standards for disabled access.

The following recommendations are directed to overcoming the core barriers to AMEP providers offering classes to meet specific learner needs. ACTA believes that quality providers are acutely

¹⁰ See also http://www.ameprc.mq.edu.au/docs/fact_sheets/06Teachingissues.pdf
http://www.ameprc.mq.edu.au/docs/fact_sheets/07Teachingissues.pdf
http://www.ameprc.mq.edu.au/docs/fact_sheets/08Teachingissues.pdf
http://www.ameprc.mq.edu.au/docs/fact_sheets/Teachingissues.pdf
http://www.ameprc.mq.edu.au/docs/fact_sheets/08TeachingStrategies.pdf

Also http://www.ameprc.mq.edu.au/resources/classroom_resources/get_wise2:

provides youth students in the AMEP with stimulating, topic-based supplementary classroom material relevant to their needs and interests.

¹¹ See also http://www.ameprc.mq.edu.au/docs/fact_sheets/02MiscLearnerDriver.pdf

¹² E.g. the *Language of Childbirth* unit, described as follows:

This is an English language resource designed for migrant women having babies in Australian hospitals. The resource aims to improve the language and literacy skills of women from non-English speaking backgrounds who may not be able to attend mainstream classes. It also aims to provide women with accessible information so that they are better informed about antenatal and postnatal issues and can make informed choices in relation to their pregnancy, birth and parenting. Topics covered include: pregnancy; getting ready; labour; the birth; you and your baby. <https://www.voced.edu.au/content/ngv%3A5041>

However, none of the above materials are aligned with currently accredited curricula – see sections 3.2 and 3.3.

conscious of these needs. All they require is the opportunity to develop flexible responses at the local level as these cohorts present.

To better meet the needs of specific cohorts in the AMEP:

6. The current method of AMEP **provider payments based on student hourly attendance** should be ended immediately.
7. Quality Assurance procedures for the AMEP should immediately be re-directed to include rigorous checking that **classes are formed and staffed in relation to learners' English proficiency levels, previous education and, where possible, their specific learning needs and aspirations** (e.g. refugee youth with minimal/no previous schooling) – as distinct from being governed by ensuring a minimum of 16 students per class irrespective of any other criteria.
8. A payment system should be installed which:
 - i. allows providers to **experiment with different types of provision** for different learner groups,
 - ii. does not attract financial penalties for well-grounded experiments (including failures), and
 - iii. gives some scope for different class sizes to meet specific student needs and aspirations.
9. **Top-down mandates** regarding the formation of specific types of classes, hours for classes, full/part-time options and other initiatives to achieve flexibility should be avoided.

2.4 Would there be benefit in introducing a web based component to general AMEP delivery?

ACTA strongly believes that, rather than embarking on a new web-based component in the AMEP, the priority should be to **improve AMEP Distance Learning (DL) provision**, and to address the relevant findings of the Social Compass Evaluation (section 5.3).

We note that the Evaluation found that all stakeholders believed DL to be a worthwhile component of the AMEP and was producing “positive learning outcomes for students”, including those special cohorts listed in 2.3.2, for example women and family visa holders (p. 41). We also note that the vast majority of DL learners had 12 or more years’ of schooling (p. 41). This finding is grounds for assuming that those with high previous education have the confidence to embark on DL but that a web-based component would not cater well for those with less than 12 years’ schooling.

It is concerning that AMEP entitlements via DL were lessened in the new contract (pp. 42-43). A respondent to a draft of this submission commented that there was less flexibility under this contract because of the enforcement of the 25:75% ration for tuition/self-study and the associated reduction in payments to the DL provider.

Other inflexibilities are the requirement that students sign up for a minimum of six hours per week (p. 43).

The Evaluation’s Key Findings on DL should be urgently addressed, including that:

- some humanitarian DL students may be disadvantaged by the rule that if they live within 50 km of an AMEP delivery site they may only use half of their allocated SPP hours in DL
- some co-enrolled students are studying two separate curricula and are therefore less likely to complete a certificate
- DL student access to volunteer tutors has decreased.

ACTA notes the following with grave concern:

Between 2015-16 and 2016-17 there was a 16 per cent decrease in DL commencements, consistent with the preceding two years. The transition to the new contract, however, saw a dramatic 80 per cent decrease in DL commencements. (p. 46; our emphasis)

The Evaluation found the contributors to this decline to be:

- the department's decision to move from a consortium to a single provider
- a continuing underlying trend of declining enrolments
- different incentives for service providers under the current contract compared to the previous one
- transition difficulties.

A key reason for the decline is that a previous “incentive” for providers to promote DL was a KPI that required them to refer 5% of their students to DL (p. 47). As with other KPIs (see section 4 below), this requirement has made data on DL participation difficult to interpret with any reliability.

The Evaluation also reported (p. 46) that:

*Given that **the majority of DL students in the previous business model were referred by service providers who were also the DL provider**, the loss of a DL provider in Victoria is a major reason for the significant drop off in DL numbers under the NBM. It is probable that provider self-interest motivates referrals. Proper Business, in their 2018 review of DL, noted that for providers other than TAFE NSW, referral of students to DL amounts to ‘a financial reduction for the service provider, particularly if the student chooses to reduce face-to-face classes in favour of distance learning’* (p.13; our emphasis).

Members of the ACTA Adult ESL Working Party noted that:

- the consortium versus single provider model (as identified in the Evaluation) is probably irrelevant to participation rates – the real issue is **the disruption caused by changing providers under a new contract**, which is especially problematic with an endeavour as demanding as producing and delivering DL resources
- providers other than the current DL provider do not refer students to DL – as just explained above, **competition between providers does not encourage DL enrolments**
- **multiple curricula** make co-enrolment in classes and DL complicated and confusing (because students can be studying two different curricula), as also occurs if a student moves from DL to classroom provision or vice versa (see also Evaluation report p. 44)
- **getting information from the DL provider is problematic** when students move to a classroom provider – this problem is compounded by the acute inefficiencies and dysfunction of the AMEP data management system (see section 1 above), which precludes transfer of this information
- **the earlier model of delivery by local providers** worked well and was a true “community of practice” in which teachers in different providers exchanged ideas, information and made referrals
- the excellent **DL modules previously open to all students before starting regular AMEP classes** have disappeared – in that respect, a web-based AMEP component would be welcome.

ACTA believes that the Evaluation Recommendation 9 requires refinement. We believe that production of DL resources, which is complex and costly, should be done by one specialist national

provider. We strongly oppose “multiple DL providers” if this entails competition in *producing* DL resources.

However, we endorse the Evaluation recommendation that DL *delivery* should be local.

ACTA’s recommendations are as follows.

To improve web-based delivery in the AMEP:

10. A single provider (or consortium of providers) should be contracted to ***produce DL resources on a long-term, stable basis***. Contracts should be allocated and provider performance reviewed as per Recommendations 2-3 above.
11. Local providers should be contracted to ***deliver DL tuition***.
12. The current method of DL provider payments should be reviewed with the aim of ***making this provision cost-effective for providers and encouraging enrolments by students who would genuinely benefit from it***.
13. Any web-based component of the AMEP should be developed within an ***overall approach to and support for DL***.

3. Teaching, curriculum and resources

3.1 What is the minimum teacher qualification required to deliver quality education?

ACTA warmly welcomes this reference to the AMEP as “*education*” (as distinct from “*training*”) and to “*teacher qualifications*” (as distinct from “*trainer requirements*”). We also welcome the reference to “*students*” as distinct from “*clients*” or “*customers*” – the latter is now in use by at least one for-profit provider (see quote above).

ACTA is encouraged by the Social Compass Evaluation statement (quoted earlier) that students “*acknowledged the AMEP teachers as **the single most important factor** that supported their learning*” (p. 21; our emphasis).

Teacher qualifications underpin teacher quality and therefore quality provision, as research demonstrates unequivocally.¹³

¹³ For example, based on her own extensive research, including several international surveys, world authority Linda Darling-Hammond states “Research consistently shows that teacher quality is one of the most important variables for student success and that teachers with stronger qualifications (academic ability, strong content knowledge, full preparation before entry, certification in the field taught, and experience) produce higher student achievement.” <https://edpolicy.stanford.edu/sites/default/files/publications/addressing-inequitable-distribution-teachers-what-it-willtake-get-qualified-effective-teachers-all-1.pdf> For other research, see: Julian R. Betts, Kim S. Rueben, and Anne Danenberg, “Equal Resources, Equal Outcomes? The Distribution of School Resources and Student Achievement in California” (San Francisco: Public Policy Institute of California, 2000); Donald Boyd and others, “How Changes in Entry Requirements Alter the Teacher Workforce and Affect Student Achievement,” *Education Finance and Policy* 1 (2) (2006): 176–216; Charles Clotfelter, Helen Ladd, and Jacob Vigdor, “How and Why Do Teacher Credentials Matter for Student Achievement?” Working Paper 12828 (Cambridge, MA: National Bureau of Economic Research, 2007); Linda Darling-Hammond, “Teacher Quality and Student Achievement: A Review of State Policy Evidence,” *Educational Policy Analysis Archives* 8 (1) (2000), available at <http://epaa.asu.edu/epaa/v8n1>; Linda Darling-Hammond and others, “Does Teacher Preparation Matter? Evidence About Teacher Certification, Teach for America, and Teacher Effectiveness,” *Education Policy Analysis Archives* 13 (42) (2005), available at <http://epaa.asu.edu/epaa/v13n42/>; Ronald F. Ferguson, “Paying for Public Education: New Evidence on How and Why Money Matters,” *Harvard Journal on Legislation* 28 (2) (1991): 465–498; Mark Fetler, “High School Staff Characteristics and Mathematics Test Results,” *Education Policy Analysis Archives* 7 (9) (1999), available at <http://epaa.asu.edu/epaa/v7n9.html>; Laura Goe, “Legislating Equity: The Distribution of Emergency Permit Teachers in California,” *Educational Policy Analysis Archives* 10 (42) (2002),

Responsibility for the quality of AMEP provision rests fundamentally with the Commonwealth. ACTA warmly welcomes the Home Affairs *Vision Statement*'s re-commitment to “*high quality*” provision and returning the AMEP to its former position as “*the best program of its kind in the world.*” In our experience, if employers abdicate their responsibility for teacher qualifications (in any area), declining standards are inevitable.

Consequently, ACTA does **not** endorse the Evaluation recommendation 14 absolving the Department from responsibility for AMEP teachers' qualifications, viz.:

Teacher qualifications for accredited AMEP curricula should be stipulated by curriculum licensing and regulations governing Registered Training Organisations, not by the contract between the government and the service provider.

The regulations currently governing Registered Training Organisations (RTOs) are, in fact, undermining quality in the AMEP in regard to both teacher qualifications and curriculum, as we elaborate below (see 3.1.2 and 3.2 below).

3.1.1 TESOL QUALIFICATIONS

The Social Compass report describes the TESOL qualification requirements attaching to the Certificates in Spoken & Written English (CSWE), as follows:

A recognised bachelor degree—a formal qualification awarded by an Australian university or tertiary institution, or its onshore or overseas equivalent, that is at least three years full-time in length or its part-time equivalent; and a recognised postgraduate TESOL (Teaching English to Speakers of Other Languages) qualification resulting from a course of study in which course content of no less than 100 contact hours (or a distance learning equivalent) covers the grammar of the English language, learning and TESOL methodology and includes a practicum.

Note: The practicum must be at least 60 hours, which includes, for example, supervised teaching, observation, field visits, resources evaluation, team teaching, and volunteer tutoring etc. If a course undertaken has less than 60 hours practicum, teachers must demonstrate teaching experience equivalent to 60 hours, or must make up the difference in duration by individually organising a supervised practicum. Appropriate documentation of such should be kept. (p. 55)

However, a different description of CSWE qualifications requirements is on-line¹⁴ and, we understand, is current:

1. a recognised university undergraduate degree or higher or equivalent
and
a recognised AQF 8 or higher TESOL qualification or equivalent
OR
2. a recognised university undergraduate degree or higher in education or equivalent with a TESOL major.

Substantive differences exist in these two descriptions:

- (i) the Social Compass description includes requirements for **course content and a practicum**
- (ii) the CSWE on-line description allows a **TESOL major** within an undergraduate degree.

available at <http://epaa.asu.edu/epaa/v10n42/>; Dan Goldhaber and Dominic Brewer, “Does Teacher Certification Matter? High School Certification Status and Student Achievement,” *Educational Evaluation and Policy Analysis* 22 (2000): 129–145; Parmalee Hawk, Charles R. Coble, and Melvin Swanson, “Certification: It Does Matter,” *Journal of Teacher Education* 36 (3) (1985): 13–15; David H. Monk, “Subject Area Preparation of Secondary Mathematics and Science Teachers and Student Achievement,” *Economics of Education Review* 13 (2) (1994): 125–145; Robert P. Strauss and Elizabeth A. Sawyer, “Some New Evidence on Teacher and Student Competencies,” *Economics of Education Review* 5 (1) (1986): 41–48.

¹⁴ <https://ames.edu.au/curriculum/cswe-teacher-qualifications/>

*ACTA regards a specification of required **TESOL content and a practicum as essential for AMEP teacher qualifications.***

We note that at least some TESOL qualifications at AQF 8 level (or higher) include a TESOL practicum, while others do not.¹⁵ ACTA regards teaching practice within a general teaching qualification (as was once considered sufficient) an unacceptable substitute. The requirement for a TESOL-focussed practicum was achieved after considerable advocacy in the late 1980s by TESOL professional associations and its abandonment would be retrograde. Even where a practicum is required, the hours required by some TESOL qualifications and the potential to avoid *supervised* teaching practice are a serious concern. The practicum requirements described in the Evaluation (just cited) are the acceptable minimum.

ACTA accepts a TESOL major in an undergraduate degree, provided it meets similar content and practicum requirements.

ACTA has no confidence in the current QA provider's *AMEP Curricula and Teacher and Assessor Qualifications Guide* recommendations (created for the Department of Education & Training, June 2018), because they rest, in effect, on ACSF requirements and therefore allow Adult Literacy qualifications to substitute for TESOL qualifications. Similarly, ASQA requirements allow non-TESOL-qualified teachers to deliver current curriculum taught in (or approved for) the AMEP, viz. the Core Skills for Learning (CSL), the Certificate in English Proficiency (CEP) and the Certificate in General Education for Adults (CGEA). **Adult Literacy qualifications are insufficient for AMEP teachers** because they lack the content just specified and also generally do not include a practicum, much less one with English language learners.

*The substantive variations pertaining to just one RTO accredited TESOL curriculum (the CSWE) are prima facie grounds for ACTA's strong advice that, given the commitment to quality AMEP provision, **the Commonwealth (through Home Affairs) should retain responsibility for AMEP qualification requirements and enforce and monitor these through AMEP contracts and Quality Assurance processes.***

ACTA does not accept the self-interested reasoning of providers seeking waivers from employing TESOL-qualified teachers, including in rural and regional locations. We note that several universities offer Distance Learning options in TESOL. The current contracting and provider payment systems (see Recommendations 2 and 4) already make AMEP teaching unattractive because it is virtually impossible to obtain anything other than a casual position. Until the toxic working conditions now prevailing in the AMEP are rectified, **teaching in the AMEP is not an attractive option for any qualified teacher, much less those with specialist TESOL qualifications.** The footnote below exemplifies this situation: house cleaning is seen as preferable by this respondent to the ACTA

¹⁵ For examples, see:

https://www.arts.unsw.edu.au/sites/default/files/documents/EDST5325_TESOL_Advanced_Professional_Practice_Term_3_2019_Course_Outline.pdf
<http://handbook.mq.edu.au/2017/Units/PGUnit/APPL922>
<http://handbook.uts.edu.au/subjects/details/010070.html>
<https://www.vu.edu.au/units/AEG5124>

survey.¹⁶ (Details of the major deterioration of teacher morale are in the Evaluation report and ACTA submissions to that Evaluation and the VET inquiry). The onerous, expensive and irrelevant requirement for teachers to obtain and upgrade the TAE Certificate IV is also a major barrier to employing qualified TESOL teachers, as we elaborate below (section 3.1.2).

ACTA notes that the Commonwealth does not keep data on AMEP teacher qualifications, resignations or working conditions.¹⁷ We know that resignations have been considerable during the current contract. Collecting these data is fundamental to ensuring quality provision in the AMEP.

ACTA supports incentives for recruiting AMEP teachers in remote and regional areas, for example, higher salaries and temporary employment for a limited period with fee support for gaining TESOL qualifications.

We believe there is scope for further independent investigation into upgrading options for teachers with well-recognised, high quality or overseas accredited lower level TESOL units and internationally recognised Certificates, including the Cambridge and Trinity Certificates. We note that work done by the National Quality Assurance in Education & Training (NEAS) would provide a useful basis for consideration.

We note **the significant costs attaching to gaining any kind of postgraduate qualification**, including in educational fields and TESOL. We request Home Affairs to take up with the appropriate

¹⁶ Here is a recent (Sept 2019) description of the duties undertaken by one casual teacher working 3 days a week:

I have been a casual trainer (we are called trainers at MAX Solutions, not teachers) since July 2018 teaching 3 days every week. For a full one year I lost two weeks of work/full payment to the full time trainer during two weeks of school holidays because AMEP students do not attend during that time and since classes are a mix of AMEP & SEE, the number is reduced so the company combines the two classes into one. So students in Level 1-3 sit together for two weeks. After the school holidays, classes go back to routine. In addition to teaching, my duties include any paper work such as CTP for withdrawals, resumptions, enrolments, update hours, etc.; communicating with SEE students' RA (referring agency or job providers); communicating with (chasing) students by calling/texting (using personal mobile phone) every time when they do not attend the class and they did not update the trainer; lodging a job/follow up with IT for any IT issues in the class/staff office and internet malfunction; lodging a job/report re building malfunctions and other issues; being forced to co-operate with the other trainer to make a roster for students to force them to clean the class facilities and student kitchen with all the appliances included regardless of whether they use them or not, arranging with AMEP managers of MAX Solutions for students in need of childcare; providing evidence at every 200 hours milestone for students' progress assessments; finding my own teaching resources; giving up my chair and desk to the students because there were not enough chairs in class for them; writing 2 matrices and 2 trainer profiles in less than a year; trying hard to keep up with new changes admin-wise; trying hard to provide evidence for my professional development; attending weekly team meetings; re-doing some of the admin work again and again simply because the head office in Brisbane cannot find paperwork/lost it/did not organize it carefully in the files where it belongs; organizing and running excursions on request and uploading their evidence on workplaces' social media as was requested by management; helping out students socially and community-wise, etc. There is no payment for any of the above. Also we have to attend 8.30am-5pm in the workplace and we are paid only 7 hours and a half every day, nothing more. I was asked to stay in the class during half an hour lunch time that I am not paid for because of duty of care. There have been times that I worked 10-12 hours per day to keep up with the demanding admin part of the job. I am looking for another job because this job is affecting my well-being at the moment. When everything is described as increasing the company's profits and the staff and students are looked on as money, there is an increasing feeling of sadness in my heart in this place. In the two days I don't teach, I work in aged care helping out elderly people. I feel loved and looked after in my job at aged care which is mostly cleaning their houses.

¹⁷ Question on notice no.299, Portfolio question number:SQ18-000614, 2018-19Budgetestimates, Education and Employment Committee, Education and Training Portfolio, Senator the Hon. Doug Cameron 15June2018. Senate Committee: Education and Employment Question on Notice Supplementary Budget Estimates 2018 - 2019 Outcome: Agency: ASQA Department of Education and Training Question No. SQ18-001071 Senator Doug Cameron provided in writing.

Question on notice no.225, Portfolio question number:SQ18-000927, 2018-19Supplementary budget estimates, Education and Employment Committee, Education and Training Portfolio, Senator Mehreen Faruqi 25 October2018. Question on notice no.227, Portfolio question number: SQ18-000929, 2018-19 Supplementary budget estimates, Education and Employment Committee, Education and Training Portfolio, Senator Mehreen Faruqi 25 October2018.

decision-makers the cost of professional post-graduate qualifications in areas of social and economic need, such as TESOL, where opportunities to recoup fees through salaries are limited or non-existent (see footnote 17 below).

3.1.2 THE CERTIFICATE IV IN TRAINING AND ASSESSMENT (TAE CERT IV)

ACTA supports adult migrants in valuing the opportunity to gain recognised credentials from their AMEP studies. We are aware that previous AMEP providers expended considerable efforts in achieving this recognition for AMEP-based credentials.

However, current RTO regulation of these credentials (by the Australian Skills & Qualifications Authority/ASQA and parallel Victorian and WA bodies) is not only at odds with quality provision in the AMEP and almost every facet of the Home Affairs *Vision Statement*, it is actually undermining these commitments. This problem extends beyond the AMEP and is hinted at in the 2019 VET review.¹⁸

ACTA believes that these problems should **not**, at least in the first place, be remedied by the AMEP disengaging from the RTO regulatory system. Disengagement would undo significant earlier gains and discourage AMEP participation.

*Rather, these problems should be urgently addressed at the whole-of-government level and form part of the Government's response to the 2019 VET review. Home Affairs should seek immediate inclusion in these deliberations and, pending wholesale reform, **should actively work to mitigate the counter-productive effects of RTO governance on AMEP providers, including seeking and/or allowing appropriate exemptions and modifications.***

Specifically, RTO governance negatively affects the AMEP in regard to qualification requirements and curriculum (re curriculum, see section 3.2 below).

Re qualifications, as from 1st July 2019, ASQA determined that:

Trainers and assessors must hold –

- TAE40116 Certificate IV in Training and Assessment or its successor
- or**
- TAE40110 Certificate IV in Training and Assessment plus the following units:
 - * TAELLN411 (or its successor) or TAELLN401A, and
 - * TAEASS502 (or its successor) or TAEASS502A or TAEASS502B **or**
- a diploma or higher level qualification in adult education.

Further:

An adult education qualification has a focus on training and assessing adults. The qualification does not need to include the words 'adult education' in the title; however, units or subjects completed within the qualification need to demonstrate the skills and knowledge required to train adults. The academic transcript or record of results for the qualification will provide the evidence to demonstrate this.

Examples of adult education qualifications include:

- CASR Part 61 Flight or Simulator Instructor
- Army Recruit Instructor
- Graduate Diploma in Adult and Vocational Education and Training
- Graduate Diploma of Adult Language, Literacy and Numeracy

¹⁸ *Strengthening Skills – Expert Review of Australia's Vocational Education and Training System*, chapter 3.

- *Master of Education or Doctoral degree with an adult education focus.*¹⁹

ACTA has been informed by some teachers whose qualifications have been assessed by RTO regulators that these assessors have demonstrated a gross incapacity and lack of knowledge in determining whether postgraduate TESOL qualifications meet these requirements. Despite the clear ASQA statement above, it is also frequently insisted that qualifications have the word “adult” in their nomenclature.

The TAE Cert IV and its upgrading units are universally criticised by AMEP teachers for their inappropriateness and irrelevance to quality English language tuition. Upgrades have been required for teachers with Masters’ degrees, years of adult TESOL experience and qualifications that included intensive teaching practice with adults. We have also been told of cases where:

- TAE Cert IV providers explicitly prohibit using TESOL-related content to meet assessment requirements²⁰
- the appropriate certification is available for purchase.

The ACTA submission to the Social Compass Evaluation documented extensive complaints about the TAE Cert IV and the difficulties in obtaining exemption from it. For example:

- * *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.*
- * *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!*
- * *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.*
- * *I have done the full upgrade, spent five weeks of the six-week holiday doing it, found it mentally exhausting and completely futile. It will have no impact on the way I teach or assess because it is irrelevant to language teaching/assessing.*
- * *I possess a Masters of TESOL and other teaching degrees. 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.*

¹⁹ <https://www.asqa.gov.au/standards/chapter-4/clauses-1.13-1.16>

²⁰ A respondent to a draft of this submission wrote:

Some providers will make a person do more work for their Cert IV TAE than is required in writing a master's thesis – honestly, I've seen it. Others will give it in a weekend workshop. The system has a ridiculously narrow and piecemeal approach to education and every possibility for misconduct within it.

- * *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 (ie, 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!)*

Although RTO regulators supposedly assess compliance, these audits apply only to *whole* institutions (e.g. TAFE Institutes) and are infrequent. In reality, compliance with the TAE Cert IV is enforced by provider managers. It is clear that their preference is to force teachers to undertake this Certificate, plus periodic upgrades, and to disallow higher level qualifications.

Here is an example of how this enforcement operates.

A teacher applied to her senior management in a major for-profit provider for recognition of her prior learning and exemption from the TAE upgrade units. She holds an Australian post-graduate qualification in TESOL, which included a unit in Adult Education, and the TAE40110 Cert. IV. She has over 15 years' experience in the AMEP, held a Team Leader position and developed assessment tasks validated and now used for assessment in the AMEP. In a sequence of emails over five months, she has been asked to provide the following in addition to proof of her qualifications, teaching experience and "PD log":

- a complete record of moderation and validation sessions, including contributions she made to the LWA Assessment Task Bank National Working Group over the past 15 months
- evidence of use of an assessment matrix
- evidence of ability to unpack a CSWE/FSK unit, map tasks to elements and performance indicators, and complete an assessment plan
- evidence of ability to design, develop and validate tasks via an updated PD log.

These requirements were not made clear at the outset but progressively accumulated as the teacher met each previous demand. The teacher has now been advised to complete the TAEASS502: Design and Develop Assessment Tools unit, which would be at her own expense.

Instead, this highly experienced, well qualified teacher has decided to work as a casual under her manager's supervision. These requirements do not apply to managers.

A respondent to a draft of this submission commented on this example as follows:

*Managers read the letter of the law because they live in fear of being found to be non-compliant by ASQA and so lose their ability to deliver courses. The likelihood of being audited is low, but it is possible and if the RTO doesn't have evidence on file then they will go down. Evidence is required for everything. One of the main problems is that the interpretation of what evidence is required varies from organisation to organisation. There are no guidelines. Some managers take a literal view, hence the seemingly unreasonable nature of requests. ... ASQA audits can be extremely stressful and they do literally dig down into that level of detail. ASQA has all this power and they require **evidence of everything, even evidence of evidence**. That's why so much attention goes into the administrative detail. And yet the VET sector is rife with malpractice and rorting. So how useful is it? It is a disgrace. (our emphasis)*

This explanation helps demystify the provider management's motivation in so discouraging the above teacher. The provider is a major for-profit organisation and has been the subject of Senate Estimates questions.²¹ Resignations by other qualified, dedicated and experienced staff in this organisation have reached the point where classes (demand for which has declined) are now largely staffed by relief teachers. As the explanation above also makes clear, these processes co-exist with

²¹ Question on notice no.151, Portfolio question number: SQ19-000159, 2018-19 Additional estimates Education and Employment Committee, Education and Training Portfolio, Senator the Hon. Doug Cameron 21 February 2019. Senate Committee: Education and Employment Question on Notice Supplementary Budget Estimates 2018 - 2019 Outcome: Agency: ASQA Department of Education and Training Question No. SQ18-001071 Senator Doug Cameron provided in writing.

orting. Another for-profit provider has staffed a combined class of AMEP and SEE students with a Horticulture Certificate holder and another class with Personal Trainer, neither of whom had TESOL qualifications (or even TESOL experience).

The example above also builds evidence for some providers' arguments for dispensing with TESOL qualification requirements in the AMEP. It also offers grounds for speculating that some providers would welcome the TAE Cert IV as the only qualification required by "trainers" to "deliver" the AMEP to "customers".

*In short, ACTA's position is that **unless and until VET sector reform is accomplished, the Commonwealth (through Home Affairs) should enforce its own quality standards on the AMEP.***

In comments on a draft of this submission, one person argued that the TAE Cert IV was necessary for AMEP teachers because it gave them an understanding of the RTO compliance requirements which regulate accredited curriculum, no matter that these are dysfunctional (see 3.2 below). ACTA does not accept this argument. Rather, we hope this submission will provide sufficient evidence of the urgent need for the Commonwealth (through Home Affairs) to seek both **reform of ASQA requirements and relevant exemptions for AMEP teachers.**

Our recommendations on teacher qualifications follow on the next page.

To ensure that AMEP teachers are adequately and appropriately qualified:

14. The Department of Home Affairs should require all teachers employed by AMEP providers to hold:
 - i. **a recognised Bachelor degree or higher**, i.e. a formal qualification awarded by an Australian university or tertiary institution, or its onshore or overseas equivalent, that is at least three years full-time in length or its part-time equivalent;
and
 - ii. **a recognised postgraduate TESOL qualification or TESOL major** in an undergraduate degree, resulting from a course of study in which course content of no less than 100 contact hours (or a distance learning equivalent) covers the grammar of the English language, how English is learned as an additional language, TESOL methodology and includes a supervised teaching practicum of at least 60 hours.Quality Assurance should include monitoring compliance with this requirement.
15. Any requirement for **qualifications in adult education** should be met by:
 - i. a single unit or equivalent that covers adult learning *within* or *in addition to* a TESOL qualification at Certificate level or above
or
 - ii. a practicum that includes supervised TESOL experience with adults
or
 - iii. teaching adults **under supervision in the person's workplace** (concurrently with employment) for at least 60 hours by an experienced and qualified TESOL teacher.
16. The Department of Home Affairs AMEP team – in consultation and collaboration with stakeholders (including providers and ACTA) – **should initiate discussion with the Australian Skills and Qualifications Authority (ASQA)** with a view to determining more appropriate and targeted RTO and course accreditation requirements or exemptions for AMEP teachers, including exempting AMEP teachers from the TAE Certificate IV in Teaching & Assessment, given that they hold teaching qualifications at higher levels.
17. Further work should be done to determine **appropriate bridging requirements**, if any, for those seeking to teach in the AMEP and who hold Bachelor's degrees (or higher), plus the Cambridge Certificate in TESOL, the Cambridge Diploma in TESOL or the Trinity TESOL Certificate.
18. The NEAS scheme for **endorsing TESOL qualification providers** should be investigated and consideration given to how it might be adopted/accepted for future AMEP teachers.
19. The Department of Home Affairs should use whole-of-government channels to pursue the problem of the **high cost of fees for post-graduate professional qualifications in areas of social and economic need**, such as TESOL, where opportunities to recoup these costs through later salaries are limited or non-existent.
20. The Department of Home Affairs should maintain an **annually updated data base** on the number of teachers delivering AMEP classes, the type of contracts on which they are employed and resignations.
21. Evaluation of tenders for AMEP contracts should allow for **salary incentives to attract qualified TESOL teachers to rural and regional Centres**.

3.1.4 ON-GOING PROFESSIONAL DEVELOPMENT FOR TEACHERS

ACTA believes that the urgent need to resolve issues around AMEP teacher qualifications is just one (albeit important) facet of the overall need to adopt a more systematic and comprehensive approach to research and development in the AMEP, which should hinge on support for on-going professional development.

At the same time as teachers are being driven out of the AMEP by the excessive and inappropriate RTO requirements, on-going professional development under the current AMEP contract has been

confined to training in compliance with the likewise inappropriate and excessive Australian Core Skills Framework (ACSF).

Under the current contract, the responsibility for any non-ACSF-related PD has been left to providers,²² whose focus – where any further PD exists – has been on compliance with curriculum frameworks. These are also, in effect, assessment frameworks. That is, accredited curriculum are skeleton descriptions of outcomes and compliance requirements (e.g. time allowed for teaching to each outcome). Teachers have been almost entirely left on their own to produce teaching and assessment resources to align with these outcomes. Meanwhile, excellent resources have disappeared from the AMEP Research Centre's and other previous providers' websites, and in any case are useless because they no longer align with accredited curricula.²³

A teacher wrote in response to a draft of this submission:

Teachers need PDs on how to write meaningful material for their classes, not just assessment tasks. I used to love creating material and sourcing good stuff. Teachers need the time to sit down and have a bit of a show-and-tell, and feel able to edit each other's work without being judgmental. There have been a few issues with badly written material with poor grammar that has gone unchecked. But there's a lot of bullying now and the atmosphere is toxic.

The Home Affairs *Vision Statement* makes the following commitments:

AMEP helps students learn English. This helps them to increase their self-reliance, support their families, be active members of the community, and get a job or further training.

AMEP meets the needs of all eligible students regardless of their gender, age, family commitments, employment status or location. Services are designed to support students' learning needs. Social connections are facilitated in the classroom and in the community.

AMEP providers help students develop and navigate learning pathways.

AMEP supports students' ability to engage with the digital world in which individuals, communities, governments and businesses are becoming increasingly immersed to connect, to deliver and access services, to obtain information and to perform everyday transactions.

AMEP is the best program of its kind in the world.

Design and delivery is supported by evidence based policy on teaching and adult learning, English as an additional language, digital literacy, numeracy and settlement.

Students and teachers have a shared understanding of the outcomes they will achieve. They set a goal on commencement, work towards it, and measure and celebrate achievement.

Realising these commitments requires a comprehensive re-engagement by the Commonwealth in supporting the rich approach to professional development that characterised the AMEP from the mid-1980s until the mid-2000s.

Commonwealth resources currently devoted to auditing compliance with the ACSF or developing an alternative meta-assessment framework would be more productively deployed if they supported professional development that allowed the AMEP to pursue these *Vision Statement* commitments.

Likewise, **the funds currently allocated to innovative project grants** would also be better deployed in supporting overall professional development in the AMEP. As found by the Social Compass Evaluation, the results of these projects have been poorly disseminated (p. 100). A respondent to a draft of this submission wrote:

²² Question on noticeno.298, Portfolio question number: SQ18-000613, 2018-19 Budget estimates, Education and Employment Committee, Education and Training Portfolio, Senator the Hon. Doug Cameron 15 June 2018, answer 6.

²³ For the remaining materials, go to: <http://www.ameprc.mq.edu.au/>

Results are on GovTEAMS, down a rabbit hole. GovTEAMS is supposed to be a shared site, but it is not well organised. They also put things up on it and don't tell providers.

The ACTA Adult ESL Working Party has noted that, in fact, these projects seem far from innovative. Rather, they have “reinvented the wheel” and/or reflect accepted practice. Almost all have also been directed to narrow employment outcomes. ACTA is of the strong view that government officials should not take responsibility for evaluating and allocating grants for such projects, since they lack the required expertise.

In contrast to a top-down exercise in “picking winners”, restoration of the annual AMEP teachers’ conference (as distinct from the managers’ conference) would encourage innovative, grass roots projects that would inevitably stem from a focus on professional development.²⁴

Our recommendations are as follows.

To re-establish quality provision and innovation in the AMEP:

22. The financial allocations currently supporting the ACSF (assessment task development, training teachers and provider audits) should be re-directed to include **a comprehensive approach to professional development in the AMEP.**
23. **The annual AMEP teachers’ conference** should be re-instated.

3.2 What are the benefits and challenges of using a curriculum of choice rather than a single program specific curriculum?

The benefits of allowing providers to choose curriculum relate solely to resultant economies:

- (i) *for the Commonwealth* – the cost of supporting assessment and teaching resources to align with accredited curriculum has shifted to providers and thence to individual teachers;
- (ii) *for providers* in Victoria and Queensland – the CSWE licence fee has been avoided.

The Evaluation found that eight out of 15 providers reported they “welcomed the flexibility to choose a curriculum that best serves their needs” (p. 51). However, what these needs are, what is meant by “flexibility” and who made these reports (senior provider managers/local managers/teachers) is not described. Responses to a draft of this current submission suggest that this finding should be treated with caution.

The challenges in using multiple curricula across the AMEP follow from:

- **the duplication and dispersion of work, effort, skills and resources** in developing even basic teaching and assessment materials to align with different curriculum specifications
- **the unnecessary costs in developing different assessment tasks for the different curricula** – we note the Evaluation finding that curriculum choice has weakened the AMEP Task Bank and that it contains only limited tasks for non-CSWE curricula (p.51).
- the work and resources required to overcome **the inherent lack of reliability in teacher-made assessment tasks** (duplicated as above) so as to restore credibility in reporting against an attainment KPI
- **the cost of developing and implementing a common AMEP meta-assessment framework**, viz. the ACSF or an alternative

²⁴ For an insight into the wealth of innovation generated by and reported at these conferences, go to: http://www.ameprc.mq.edu.au/events/amep_conferences

- **the inherent lack of credibility in any such meta-assessment framework** if the data on which it draws from teacher-made tasks are themselves unreliable
- **ASQA accreditation requirements**, which can conflict with English language learning needs and are currently impoverishing *all* curricula in this (and other) areas
- **separate providers** dealing with ASQA accreditation requirements
- **a weakened and divided locus of arguments for the reform** of ASQA requirements to accord with AMEP learner needs
- **variability in curriculum suitability for English language learners** – the Evaluation found that “*current [AMEP] approval processes may not be sufficient to ensure that curricula are appropriate for EAL students* (p. ??)
- **the complications created for data management**, especially when current data management procedures urgently need reform (see section 1 above)
- **widespread teacher resistance** to the curricula now installed, including industrial action in Queensland and teacher resignations across the country
- **the threats to teachers’ status and salaries** that follow from ASQA accreditation of some curricula with lower teacher qualification requirements, non-TESOL qualifications and teachers re-designation as trainers and/or tutors (as we understand may follow with the CSL and possibly other curricula).

It is a Kafkaesque fiction that curricula “of choice” are now being used in the AMEP and that providers have chosen curriculum “that best meets the needs of their students” (Evaluation report, p. 50). The choice has lain solely with senior provider managers. In Queensland, the lack of choice extends to TAFE Queensland consortium partners, who must not only teach the curriculum mandated by the lead partner but are required to pay that partner a licence fee.

Teachers have absolutely no choice in the curriculum they now teach, as is clear from the ACTA survey, the ACTA Forums on the AMEP Evaluation, and numerous responses to a draft of this submission.

The following reports give the lie to any claim that the various curricula now in use best meet student needs:

- **Content is inappropriate** for many learners e.g.:
 - * repeated exercises on OH&S requirements
 - * content that assumes knowledge of local culture
 - * content that assumes oral fluency in English
 - * content that is patently ridiculous (e.g. requiring students to use “once upon a time” in narrative texts).
- Curricula focussed on/drawn from Foundation Skills courses appear to offer **little/no room for teaching important settlement content** (e.g. safety at the beach, getting to know your neighbourhood; see also the next dot point).
- **The rich array of resources** that supported and were aligned with the previous CSWE are no longer accessible or cannot be reconciled with current curriculum specifications, e.g. *Let’s Participate: A course in Australian Citizenship*; *Language of Childbirth*; *Get Wise* (for refugee youth); *Stay Safe* (basic safety around the home).²⁵

²⁵ <http://link.randwick.nsw.gov.au/portal/Lets-participate---a-course-in-Australian/OD7Q5jNsuUM/>
<https://trove.nla.gov.au/work/19551293?selectedversion=NBD41691166>
<https://www.voced.edu.au/content/ngv%3A5041>
http://www.ameprc.mq.edu.au/resources/classroom_resources/get_wise2

- Some provider managers have **over-ridden the choices permitted in other curricula** (e.g. the CSWE and EAL Frameworks) for teaching settlement content – the most probable reasons for narrowing even TESOL-oriented curricula are (i) to lessen the burden of compliance requirements, especially reporting on assessments, (ii) to align these assessments with the ACSF, (iii) to lessen the burden of teachers having to develop teaching materials and assessment tasks, and (iv) to simplify teaching in order to accommodate different proficiency levels in the one class (see section 2.3).
- **Impossible timelines** are specified for teaching the mandated content.
- There is **limited scope for modifying accredited curriculum** in the light of experience and problems, after which ASQA requires the curriculum to undergo re-accreditation.
- Teaching is **entirely directed to meeting assessment and audit requirements**.
- **Assessments are now doubled** to meet two different requirements (the AMEP KPIs and accredited curriculum specifications) – the separate AMEP KPI-related requirement is necessitated by abandoning a single national AMEP curriculum and its associated assessment system, and the perceived compliance need for common assessment across the Program.
- Teachers are required to produce **their own assessment tasks** (including meeting weekly quotas in some providers) and teaching resources to align with mandated curriculum – this is done in unpaid time.
- **Professional development** to support teachers' understandings of new curriculum requirements is mostly absent.
- Because students in many classes now encompass different curriculum levels (see section 2.3), the already demanding **curriculum requirements are multiplied several times over** creating intolerable workloads and resentment of these demands teachers must meet multiple RTO and contract-mandated curriculum requirements.
- It is impossible to follow **mandated curriculum sequences** when new students (at all proficiency levels) are constantly admitted to single classes, and when providers collapse classes if numbers fall below a financially viable number of students
- Curriculum specifications required for accreditation are **often arcane**, have little to do with the subject matter and more to do with formatting and the exceedingly narrow view of adult education promulgated within VET.
- the curriculum frequently **distorts teaching sequences** that support English language learning.

In regard to specific curriculum, the Evaluation found that “*EAL Framework teachers are generally less satisfied than those who are still teaching the CSWE*”:

Teacher survey data shows that 39 per cent of EAL Framework teachers and 53 per cent of CSWE teachers feel that their curriculum had a somewhat or highly positive impact on effectiveness of teaching. For effectiveness of learning, 37 per cent of EAL Framework teachers and 40 per cent of CSWE teachers responded positively. (p. ?; our emphasis)

The Evaluation data on the CSL is ambiguous because of the low response rates to the Evaluation questionnaire:

*Of the 400 respondents to the Evaluation's teacher survey, only 22 were using the CSL. These teachers using CSL indicated that they were, on the whole, satisfied with the curriculum. Five of these teachers made positive comments about the CSL, explicitly stating that the benefit of CSL is its alignment to the ACSF. However, **these 22 respondents represent only six per cent of all CSL teachers who were approached to complete the survey. This rate was much lower than the overall national response rate of 20 per cent.***

*Social Compass also gathered information from teachers using the CSL through two teacher interviews, and submissions from a representative of a state teachers' union, a subcontractor using the CSL, and ACTA. All of these sources argued that the CSL is not appropriate for EAL learners. The submission from the teachers' union representative included responses from a survey of 54 teachers. **Ninety-six per cent of these teachers responded negatively to the question 'Do you think CSL is a suitable training package for our ESL (English as a Second Language) students?'** Ten of these teachers reinforced this view by adding a comment explaining that the CSL was not designed for language acquisition. The interviews with two CSL teachers and submissions from ACTA and a subcontractor supported this view. [p. 53; our emphasis]*

The low approval rates for the CSWE and EAL Framework, and the data on the CSL, underpin ACTA's conclusion that the problems listed above apply to *all* curricula currently in use in the AMEP, including the previous common curriculum (the CSWE).

Although the CSWE is still by far the most fully developed and best favoured curriculum, re-accreditation to meet ASQA requirements in 2018 has seriously impoverished and distorted it. Units with a clear progression of skills and detailed performance criteria have often been re-organised to fit ASQA requirements and defy relevant second language learning principles. It is not too extreme to say that it is a tragedy that professional development for the CSWE must now focus on mending this damage.

While the current arrangements allow the Commonwealth to cost-shift responsibility for AMEP curriculum to providers and individuals, the evidence above points to massive real costs, inefficiencies and loss of quality. Hence ACTA has come to the strong view, ***unanimously endorsed by all those consulted***, that the AMEP's return to the Immigration portfolio should also include a return to **one national AMEP curriculum**. As one respondent wrote to ACTA:

*We've got to accept the notion of choice (it is, in fact, responding to learner needs, which we would all agree on). The problem is **where the choice is made and who makes it**. It's currently by providers between curriculums. It should be made by trained teachers within a single, shared, fit-for-purpose national AMEP curriculum. A national curriculum can be the focus of resource and professional development. It builds the kind of professional community that has always been a core strength of the AMEP. It helps overcome the fragmentation of multiple providers. Importantly it provides an assessment framework and eliminates the need for mapping. It provides a common language for all stakeholders. So how about a simple message - the AMEP is based on **choices made about learner needs by trained teachers within a fit-for-purpose curriculum**? (emphasis in the original)*

The time, effort and resources expended on seeking ASQA accreditation for multiple curricula cannot be justified. We understand that re-accrediting the CSWE took a team of two people working for over a year, followed by unspecified others undertaking further modifications to meet ASQA requirements. The CSL is still in development despite it being mandated for use in 2018. ACTA's understanding is that TAFE Queensland has told AMEP teachers they are submitting CSL revisions to ASQA, and later will seek re-accreditation. They expect a revised CSL to be available by mid-2020. It is not difficult to understand why teachers are frustrated by this extended and expensive process. A Queensland teacher wrote in response to a draft of this submission:

The obvious question (which we can't ask) is: why we are using a curriculum which we have been rewriting since we implemented it?

The Department's current abrogation of responsibility for curriculum and the use of multiple curricula make seeking reform difficult, if not impossible. If the AMEP were taught through one national curriculum, Home Affairs and providers could make a unified case for reform to the accrediting authority.

Returning to a national AMEP curriculum would end the current wasteful and heart-breaking duplication, and its dilution of effort and scarce resources. It would create a solid basis for harnessing the knowledge and skills necessary to develop and support quality AMEP teaching. It would benefit the AMEP but extend further, for example, in re-establishing a credible quality assurance and performance framework and the AMEP's national and international reputation. Commonwealth ownership of the AMEP curriculum would end licencing barriers and (if Recommendation 24 below were adopted) would support quality teaching in other domains and increase the pool of teachers capable of teaching in the AMEP.

In ACTA's view, the most efficient and effective way to implement a return to a national AMEP curriculum would be via a tendering process. However, tendering would need to rest on stability for the provider doing this work – see our Recommendation 2 above. Genuine, in-depth consultation would be essential, including face-to-face and meetings and video conferences with the stakeholders and independent experts listed in (i)-(v) in Recommendation 27 below.

ACTA's recommendations are follow on the next page.

To re-establish high quality AMEP provision; its outstanding national and international reputation; design and delivery that is supported by evidence based policy on teaching and adult learning, English as an additional language, digital literacy, numeracy and settlement; a strong quality assurance and performance framework to underpin the Program; and outcome data that can be used for continuous improvement:

24. The Commonwealth should move as quickly as possible in the direction of re-instating **one national, fit-for-purpose, well-supported AMEP curriculum within which options/pathways are developed** to support comprehensive and flexible responses to diverse learner needs and aspirations.
25. The task of developing, seeking ASQA accreditation for and supporting this curriculum should be put to tender and **allocated to one quality provider (or provider consortium) with proven experience in TESOL curriculum development**. The success of this recommendation would depend on long-term stability in this contract, as per our Recommendation 2 above.
26. As a basis for this move, the Commonwealth should **acquire the CSWE licence from TAFE NSW**. (The likely basis for the new national curriculum is the CSWE, since – despite its recent impoverishment to meet ASQA requirements – it rests on on-going development and refinements from the late 1980s onwards.)
27. The provider awarded the task of developing the national curriculum should be required to **consult extensively and in-depth** with:
 - i. all other AMEP providers
 - ii. individual experienced and expert AMEP teachers (current and/or previous)
 - iii. the Advisory Committee recommended in the AMEP Evaluation
 - iv. independent experts in TESOL curriculum and assessment, and
 - v. representatives from teacher education faculties universities that deliver quality TESOL teaching qualifications (see Recommendation 9 above).

A Steering/Advisory Committee should be formed from i-v above to provide a stable source of guidance and feedback for this work.

28. AMEP providers should **retain the option of choosing alternative curriculum** on the understanding that they must support it from their own resources.
29. The national curriculum and associated resources should be **available without charge** to all AMEP providers, and on request to TAFE institutes, Government schools and university TESOL teacher education faculties.
30. The national AMEP curriculum should be the basis for **any further Commonwealth investment in developing assessments of learners' English proficiency**.
31. **Curriculum goals/outcomes and related learning should drive teaching in the AMEP**, not any superimposed assessment framework.
32. Assessments of learner attainment in the AMEP should be based on assessments of their progress in achieving **the outcomes described in the national curriculum**. (As an interim measure, which should be instituted immediately, these attainment assessments should be based on progress in the curricula currently taught by providers.)
33. AMEP teachers and provider managers **should not be required to undertake double assessments of learner attainment**. The current inefficient requirements for double assessments should **cease immediately**.
34. In regard to curriculum and assessment, **the priorities for Commonwealth financial investment** should be:
 - i. moving towards **one national AMEP curriculum**
 - ii. resources to support valid and reliable **assessment tasks** drawn from that document learner progress in achieving learning outcomes specified within the options and pathways of that curriculum,
 - iii. **materials development** that supports the national curriculum and options within it,
 - iv. resources to support the **AMEP's broad settlement goals**, which include but go well beyond gaining employment, and
 - v. **professional development** that enhances actual *teaching* in the AMEP.

3.3. What are the challenges in developing teaching resources, and could those resources be used more broadly among service providers?

The key challenges to developing teaching resources for the AMEP are:

1. ***the damage done by the current contract***, viz. –
 - i. the loss of the wealth of materials that aligned with and supported the old CSWE, which now do not align with any curricula, is nothing short of tragic (see the previous section);
 - ii. the current shift of resourcing and effort to support the ACSF (or any meta-assessment successor), which is extraneous to any curriculum;
 - iii. the impact of compliance requirements based on the ACSF;
 - iv. the focus on assessment (for both the ACSF and accredited curriculum) – this is where all the money and energy has gone.
2. ***the curriculum accreditation structure currently in place***, viz. –
 - i. accreditation is governed by regulatory bodies with no responsibility for implementation of the curricula they accredit;
 - ii. provider costs (in time, person-power and money) in seeking curriculum accreditation leaves little or nothing for resourcing its implementation;
 - iii. teaching resources (to the extent they are produced) are constrained and narrowed to meet the assessment specifications of accredited curriculum.

The **only** rationale, cost-effective and efficient way to promote the broad use of teaching resources is for **talent, effort and money to go into supporting one national AMEP curriculum** which has different options and different pathways within it. See Recommendations 19-29 above.

This move should be underpinned by **greater stability in the allocation of AMEP contracts**, such that high-performing providers and teachers can:

- work in a sustained and focussed way to develop teaching (and assessment) resources
- collaborate with other providers to develop a “community of practice”.

See Recommendation 2 above.

For the reasons already stated, ACTA believes that the AMEP should remain within the current RTO framework but also that Home Affairs should actively and urgently seek its reform. See Recommendation 11 above.

3.4 What is needed to improve numeracy and digital literacy?

As already indicated, many students in the AMEP have numeracy and literacy skills, including digital literacy, equivalent to or higher than their Australian counterparts. These students would be best served by **options within their AMEP course that adopt an English-for-specific-purposes approach** in teaching the English through which their existing knowledge and skills can be expressed. Alternatively, depending on their English proficiency, they could combine mainstream VET units with learning English – we understand this option is offered by some TAFE providers. The scope for this option would broaden if our Recommendations 1-3 above were adopted. What is **not** needed are compulsory numeracy units for these learners, as we understand is the case in the CSL.

As also already indicated, those AMEP students who have limited/no previous schooling face the major challenge of acquiring a new language together with the basic knowledge and skills that come from formal education. Here age is an important factor: adolescent and young adult learners are frequently capable of acquiring digital literacy with some acuity and speed. However, digital

technology can also be put to excellent use with low literacy students, simultaneously for teaching English and acquiring basic computer skills.²⁶ See also discussion of the ‘digital divide’ in the Social Compass Evaluation report (p.45).

What is needed for both learner groups is **removal of the constraints and financial risks faced by providers that currently prevent them from offering the flexible and different tuition options outlined in sections 2.2 and 2.3 above**. Quality providers are more than capable of responding to these needs in innovative and effective ways, including collaborating with colleagues in other relevant disciplines.²⁷ The new CSWE contains numeracy units that can be chosen according to need. In fact, most reputable providers deliver classes that require some form of student engagement with technology.

4. Student outcomes

Besides English language outcomes, are there other student outcomes being achieved through AMEP that are not captured, or could be better captured, in the current reporting?

ACTA welcomes this question, which points to one of the key achievements of the AMEP, namely its crucial role in making new (and not so new) migrants feel welcome in their local communities and the wider society, giving them confidence and intercultural skills, and providing them with knowledge about Australia.

A close content analysis of the data from the 404 students interviewed by Social Compass Evaluation in 30 focus groups (p. 5) should provide a rich resource for answering this question. The non-language outcomes listed on pp. 19-21 provide a useful starting point.

Much of the English previously taught in the AMEP has social goals that were equally if not more important than gains in English language proficiency, for example the now discarded units on citizenship,²⁸ the *Language of Childbirth*, safety in the home, and – for refugee youth – budgeting, relationships, mobile phones and the internet, driver instruction, and pathways to education and employment (see sections 2.2 and 2.3).

We also note an Evaluation Key Finding that:

Removal of separate funding for AMEP counselling has resulted in a shift in focus from case management to tracking the progress of students in the AMEP.

Under previous contracts, AMEP Counselling was an effective contributor to a range of non-linguistic outcomes for students in regard to their personal well-being, facilitating referrals to other services (e.g. IHSS, Centrelink, health services, trauma counselling, the legal system), initiating community contact and establishing pathways into further training and employment. This service was particularly cost-effective because AMEP teachers see their students on a daily basis, and are in-built and cost-effective “early warning system” that initiated timely and appropriate interventions. In response to a draft of this submission, a teacher wrote:

I was the Voc. Counsellor for several years and helped many individuals gain a pathway into TAFE, apply for jobs or simply access other services such as Counselling or legal aid. A Vocational Counsellor who is also a teacher has the ability to build up trust among students by being a familiar face and by being accessible. You can also track students’ progress formally and informally and find

²⁶ See <http://www.ameprc.mq.edu.au/docs/conferences/2005/AlexDodgson1.pdf> ; <http://www.ameprc.mq.edu.au/docs/conferences/2005/AlexDodgson2.pdf>; <http://www.ameprc.mq.edu.au/docs/conferences/2005/AlexDodgson3.pdf>

²⁷ For an example, see <http://www.ameprc.mq.edu.au/docs/conferences/2005/AmandaMcKay.pdf> . For the use of digital technology in teaching pre-literate students, see <http://www.ameprc.mq.edu.au/docs/conferences/2005/AlexDodgson1.pdf> <http://www.ameprc.mq.edu.au/docs/conferences/2003/thurstunSearch.pdf>

²⁸ We understand that this unit attracted many students to DL study.

support for them if needed. This position should be reinstated if the government is so concerned about migrant employment.

A respondent to a draft of this submission (whom we understand has also written separately to Home Affairs) drew attention to a crucial issue in developing social cohesion which is especially pertinent to the AMEP. AMEP classrooms bring into close contact people with very different religious affiliations and often misconceptions about other religions. Developing better knowledge and tolerance of differences is necessary for both students and teachers. The respondent wrote:

*A few years ago, I had a Chinese born Australian colleague at school come to me as she was very concerned about the arrival of Muslim refugee students. She quietly sought me out as she knew I was studying this area. Discussion showed she just needed re-assurance that they were 'normal' as she was feeling scared by the arrival of these students due to the media hype ... In my experience, there are few staff in such work places who are trained by accredited providers to assist in managing such sensitive matters. **Policy change:** Teachers and service providers need training on how to anticipate and then sensitively manage friction on faiths/world view matters.²⁹*

These understandings can be seen as a sub-set of students and teachers building inter-cultural competencies.³⁰ The respondent continued:

AMEP teachers need to incorporate aspects of Australian workplace culture in their classrooms, i.e. firm hand shakes, harassment issues, hierarchies, socializing in work places, mixing with other faith/world views. Lunch room discussion with ESL teaching colleagues show that such matters can be unknown to some teachers who may also be recent arrivals in Australia. This soft skill settlement/integration of students has gone on the back burner in recent years due to a continual PD focus on compliance, assessment procedures and IT skills.

We note mention in various reports of a National Client Satisfaction Survey published in 2001³¹ and also that Queensland TAFE appears to have an on-line AMEP survey.³² ACTA suggests that a worthwhile endeavour would be the development by Home Affairs, in consultation with providers and for their use, of a relatively short and simple student survey that attempted to capture key non-linguistic outcomes identified by the Social Compass Evaluation.

For students with low English proficiency, reporting on non-linguistic outcomes will probably require the use of interpreters or printed material in languages other than English.

This question from Home Affairs raises a crucial issue regarding reporting and accountability in the AMEP. ACTA holds the firm view that **reporting in the AMEP should extend well beyond benchmarks set by any KPIs**. KPIs are a crude tool for ensuring accountability and should be recognised as such. They reduce understandings of quality provision to what can be counted. They over-simplify even what is counted. Experience with the ACSF has clearly demonstrated that, when reporting is tied to KPIs, perverse incentives to game the system and the threat of penalties compromise the reliability of reports. Nevertheless, for continuous improvement, accurate reporting is essential. We therefore endorse the extension of reporting to non-language outcomes **on the strict proviso** that this reporting is not tied to any KPI.

Our recommendations are as follows.

²⁹ See also: <http://religionsforpeaceaustralia.org.au/?p=6647#more-6647>

³⁰ https://en.wikipedia.org/wiki/Intercultural_competence
<https://www.monash.edu/arts/monash-intercultural-lab/about-the-monash-intercultural-lab/what-is-intercultural-competence>
<https://www.australiancurriculum.edu.au/f-10-curriculum/general-capabilities/intercultural-understanding/>
<https://researchers.mq.edu.au/en/publications/negotiating-intercultural-experience-through-english-as-a-foreign>
<https://researchers.mq.edu.au/en/publications/developing-rapport-in-inter-professional-communication-insights-f>

³¹ <https://catalogue.nla.gov.au/Record/3031553>

³² https://www.surveymonkey.com/r/AMEP_Client_Satisfaction_Survey

To facilitate the achievement of important non-language outcomes in the AMEP through reporting and other means:

35. Home Affairs should develop and trial a **Client Satisfaction Survey** for use by providers on a term-by-term basis, which draws on the non-language dimensions of AMEP provision identified in the Social Compass Evaluation and other sources. The data from these surveys should be available to providers and teachers with all necessary limitations to protect respondents' identities.
36. In addition and over a longer time frame, Home Affairs should commission the development of a variety of questionnaires for AMEP students at the beginning and later in AMEP courses, which **probe the development of important cultural competencies**.
37. Professional development opportunities for AMEP teachers should include how to **incorporate within their teaching important cultural competencies and strategies** for encouraging students' tolerance of different faith and world views.
38. **On no account** should the results of the above (30-32) relate to any KPI.
39. A more comprehensive **Counselling service** should be re-introduced to the AMEP.

5. Volunteers

What is needed to increase the number of AMEP volunteers and how can they be better utilised?

The ACTA Adult ESL Working Party reported that:

- the use of volunteers to support teachers in AMEP classrooms has been restricted by some providers
- volunteers are being used by some providers to teach whole classes and to counsel students (also reported in the ACTA survey)
- volunteers are available in some locations but are not utilised
- volunteers would be more effectively utilised in the classroom if the excessive teacher workload attached to assessment and reporting were removed
- volunteers are discouraged by having to complete extensive paperwork.

The following response to a draft of this submission illustrates both teachers' appreciation of volunteers and their exploitation:

I had a very loyal tutor, who was totally dedicated. ... He moved to ... [a rural town] and ended up actually teaching groups! He told me the teacher would simply hand him the worksheets and let him get on with it!

We note the Social Compass Evaluation finding that when providers lose contracts, details of volunteers are not passed on. We suggest that a central register of volunteers within regions (with suitable privacy and permission protections) should be maintained by Home Affairs. The current dysfunctional information management system has so far prevented development of this registry.

The Evaluation report provides no information on the materials and training that previously supported volunteers.

Materials development might be an appropriate component of DL provision. Training should, however, be local.³³

³³ For an inspiring program that trained higher level AMEP students as volunteers with lower level students, see <http://www.ameprc.mq.edu.au/docs/conferences/2005/KarenSlikasBarber.pdf>

ACTA endorses the Social Compass Evaluation Recommendation 5 on Volunteers and offers the following.

To increase and better utilise AMEP volunteers:

40. QA audits should include scrutiny of **how volunteers are utilised in AMEP venues** (teacher support/ whole class teaching/ other duties) and off-site.
41. QA audits should be directed to determining, preventing and reporting on **any use of volunteers as whole-class teachers**.
42. Volunteers should not be subjected to **arduous compliance requirements**.
43. **Volunteer training and support packages** should be reviewed and upgraded where relevant.
44. Options for **on-line volunteer training and support** should be explored through DL provision. However, initial training should always be face-to-face.

6. Pathways

How can better collaboration with other providers and community groups be facilitated, to assist with students' settlement journeys?

The pre-requisites for collaboration and building networks to assist students on their settlement journey are:

for providers –

- time, stability, the ability to plan, and a long-term vision
- the opportunity and flexibility to experiment with different options (in tuition and other experiences)
- experience in dealing with other providers and agencies, and knowledge of what they offer, especially in one's local area
- trust and collaboration between providers (which is impossible if they are competing for contracts)
- resourcing to support transport (for taking students to different places; for teachers to visit students at other sites and to pursue collaborative arrangements)
- insurance to cover OH&S issues (for both teachers and students)
- provision for maintaining communication with and gaining feedback from other agencies.

for students –

- continuity of provision
- building confidence and trust
- trusted support and mentoring when in taking up challenges in new contexts (e.g. volunteering, work placements etc.)
- time and space to reflect on experiences beyond the classroom and to consolidate and extend relevant English and other skills in the classroom
- assistance with transport and equipment (e.g. boots and uniforms for sporting activities).

To facilitate better collaboration with other providers and community groups in order to assist with students' settlement journeys. please see our discussion and recommendations regarding flexible options and contracting for the AMEP (section 2 and Recommendations 1-3).

Conclusion

A wealth of knowledge and experience has been both gained and lost since the AMEP began in 1948.

A major turning point in the Program occurred in the early 1990s when market-based approaches to the delivery of Government services were instituted. AMEP providers responded with vigour and creativity to the changes that followed.

However, the negative effects of these changes have slowly taken their toll, specifically the assumption that competition will drive efficiencies and innovation in the AMEP, and that the Government's role is to ensure compliance with KPIs and highly detailed contracts. These compliance specifications have replaced trust and any belief in professionalism that is motivated by more than self-interest. Government has disengaged from responsibility for crucial underpinnings in actual program delivery, for example, staffing, curriculum content and infrastructure.

In the 2017-2020 AMEP contracts, the most negative aspects of the market-based approach have subjected the Program to extensive cost-shifting and excessive, inappropriate and narrowly defined compliance requirements. The adverse and disruptive consequences of major changes were not considered. These consequences include:

- the abandonment of the rich array of teaching and assessment resources that had made the AMEP a world leader
- the alienation of a highly qualified, experienced, dedicated and professionalised teaching force,³⁴ many of whom have resigned
- the complete dominance of assessment over curriculum and teaching
- the loss of the Program's flexibility and responsiveness to specific student cohorts
- the dominance of financial considerations, which now override all aspects of quality provision to the point that even the most basic criteria for forming class groups no longer apply (viz. English language level and previous education)
- the re-focussing of Quality Assurance on auditing learner assessments and the associated failure to monitor basic standards in infrastructure (toilets, ventilation and heating, classroom chairs and desks, etc.) and the rorting of contracts re class sizes and use of qualified teachers
- the total erosion of credibility in reports on Program outcomes
- increased duplication and complexity in the provision of English language tuition for adult migrants that has no rational basis and is sustained solely by administrative silos.

As stated in the introduction to this submission, ACTA welcomes Home Affairs' questions on how to improve the AMEP. The return of the AMEP to the Immigration portfolio offers a once-in-a-lifetime opportunity to reform and strengthen the AMEP. We sincerely hope that this opportunity will not be lost by a failure to address the key issues underpinning the questions Home Affairs has posed.

³⁴ The Social Compass Evaluation describes this alienation as follows:

Over two thirds of surveyed teachers indicated that the administration and assessment associated with meeting these KPIs had a negative impact on their wellbeing. Social Compass heard accounts of teachers taking stress leave, leaving their jobs or contacting their union for support. Thirteen teachers described instances of 'manipulating' student ACSF assessments by altering assessments, helping students or assigning a lower initial assessment score in order to facilitate reportable progress after 200 hours. ... One interviewee spoke of 'agonising' discussions with colleagues about the ethics of this practice but they felt that the unreasonable workloads created by the assessment process gave them no alternative. Increased teacher workloads have had serious implications for one service provider who reduced the contact hours for their teachers to give them more time to complete administrative tasks and reduce staff turnover. (p. 72)

This provider calculated that they were losing "\$300 each person a week we're not seeing any face-to-face contact for."

ACTA's proposals address these fundamental issues. Our recommendations can be summarised as follows:

- 1) **The content and structure of the AMEP** should be governed by the goals articulated in the Home Affairs *Vision Statement*, viz. enabling migrants learn English so they can participate socially and economically in Australia.
- 2) These **goals and their associated curriculum content** should govern English language assessments in the AMEP.
- 3) The AMEP should return to delivering **one national curriculum** that re-focuses effort and resources on developing teaching materials and assessment tasks, and the development of an array of options within that common framework.
- 4) The **provider payment system** should return the AMEP to delivering tuition governed by the essential criteria for the effective formation of class groups (viz. relatively homogenous English levels and previous education) and should encourage responses to the particular needs of different learner cohorts.
- 5) **Provider and teacher initiative** should be encouraged in responding to student needs – in contrast to the top-down inflexible imposition of various tuition options.
- 6) The highest standards of **teacher professionalism** should be required, including specialist TESOL qualifications and opportunities for professional development such as the annual AMEP teachers' conference
- 7) **Eligibility for the AMEP should be simplified and streamlined**, and therefore based on one single criterion, viz. the level of English proficiency level agreed as necessary to enter mainstream education and training.
- 8) The current **disruptive, wasteful, ineffective and inefficient method of contracting for the AMEP** should be replaced by a more cost-efficient, targeted, independent and effective review and rating system for evaluating providers (as described in previous ACTA submissions) to determine whether and under what conditions contracts should be renewed, terminated or tendered for.

ACTA's proposals are fundamental if the commitments in the Home Affairs *Vision Statement* are to be effected. They are also pre-requisites for making the AMEP cost-effective, efficient, productive and capable of delivering credible outcomes.

Please note the following attachments:

1. **ACTA Survey Q41:** Student withdrawals before exhausting tuition entitlements pp. 1-5.
2. **AMES Australia Response to the Inquiry into Migrant Settlement Outcomes**
3. **ACTA Submission to the Inquiry into Migrant Settlement Outcomes.**