



**Key Issues in Determining Future Settings for the AMEP –
Towards a Collaborative Discussion
January 2023**

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1 AMEP goals, outcomes, KPIs and Quality Assurance

1.1 Goals and Outcomes

The last explicit statement of AMEP goals was in the 2015 ACIL Allen Report:

The AMEP aims to promote and support the acquisition of English language skills by all eligible adult migrants and humanitarian entrants, through the provision of timely and quality English language services. Through language tuition, the programme aims to produce outcomes in relation to social participation, economic wellbeing, independence, personal wellbeing, all contributing to settlement within, and integration into, the broader Australian community.

Specifically, the AMEP is intended to assist eligible migrants and humanitarian entrants in the development of English language skills that are needed to access services in the general community, provide a pathway to employment, undertake further study or training and participate in other government programmes. (p. ix)

That report endorsed these goals but recommended better tracking of outcomes in relation to “programme objectives” (p. ix).

In previous submissions, ACTA proposed five measurable Outcomes for the AMEP, which derive from and would support the overall goals of Australia’s immigration program, viz.

- 1) eligible migrants’ participation
- 2) learner English gains
- 3) student satisfaction
- 4) provider quality
- 5) a sound and consistent evidence base to support Outcomes 1-4.

ACTA has proposed that procedures should be instituted that establish valid, fair, evidence-based, measurable benchmarks for each Outcome, and that measures should aim for accuracy and reliability, and should disallow provider incentives that compromise good data.

Similarly, the ACTA *AMEP Action Plan* called for the development of “a substantive outcomes framework to govern the AMEP” (Action 5).

The Discussion Papers referred to in the introduction to the Department of Home Affairs (DHA) *Request for Feedback – Adult Migrant English Program future settings* did not include comprehensive or clear statements about AMEP goals and outcomes.¹ The associated consultations were constrained by the previous Government’s narrowly specific agenda to monetise outcomes, and hence focussed on stakeholders’ objections to this agenda. Now that this issue has been resolved, a precious opportunity exists for forward-looking, open-ended consideration that seeks to reinstate the AMEP as a world leader in English language provision for adult migrants.

The Overview in the DHA *Request for Feedback* makes indirect reference to the national goals served by the AMEP, viz. supporting the development of adult migrants’ English language skills that are “critical to fill social and economic participation in Australian” society”. However, the specific goals and outcomes now envisaged for the AMEP are not mentioned. ACTA understands and accepts that the *Request for Feedback* was not intended to initiate a comprehensive review of the AMEP but was focussed on issues arising from the Government’s decision not to proceed with an outcomes-based payment system. However, our substantive point stands: policy documents since the ACIL Allen review have not provided clear and

¹ [Request for Feedback – Adult Migrant English Program future settings \(homeaffairs.gov.au\)](https://www.homeaffairs.gov.au/request-for-feedback-adult-migrant-english-program-future-settings)

comprehensive statements of AMEP goals and intended outcomes but rather have focussed on specific policy priorities. The principles guiding these priorities have become increasingly unclear.

What is needed

We respectfully suggest that collaborative discussion is needed to re-establish consensus on:

- 1) the national goals served by the AMEP
- 2) how these goals can be translated into outcomes that are appropriate and specific to the AMEP
- 3) how these outcomes should be validly, reliably and fairly measured.
- 4) how the AMEP's contribution to national goals and its specific outcomes can be supported and promoted.

1.2 Proposed KPIs: Issues

The proposed KPIs in the DHA *Request for Feedback* provide no basis for inferring the national goals served by the AMEP or its intended outcomes.

The data gained through the proposed KPIs will support ACTA Outcome 5 above. However, the KPIs' relationship to or support for Outcomes 1 – 4, or any alternative specification, is not stated and mostly impossible to infer.

The purpose served by the KPIs is also not transparent (see 1.3 below).

KPIs 1, 2 and 3 are potentially undermining of ACTA's proposed Outcomes 1 (productive participation), 2 (English gain) and 3 (student satisfaction) above, because they incentivise providers to pressure learners to take up places and continue in the AMEP, and to assess students irrespective of the benefit or otherwise to individual learners.

The benchmark measurements for KPIs 1, 2 and 3 appear arbitrary and crude because they take no account of learner educational backgrounds, age, migration experiences (e.g. torture and trauma) and settlement issues (e.g. finding work, accommodation and schooling for children, and caring responsibilities).²

If evidence exists for these benchmarks, it is not transparent. If benchmarks are intended for KPIs 4 – 7, they are not stated.

KPIs 4, 5 and 6 relate to provider performance in relation to administrative requirements. The relationship to quality English language provision is unclear.

1.3 Quality assurance

How provider performance, and most importantly the overall performance of the AMEP as a government-funded program, are to be evaluated and reported should be explicit and transparent. Quality Assurance (QA) provision is a key element in both evaluation and reporting.

² This submission is confined to considering AMEP settings in line with the DHA *Request for Feedback*. However, achieving AMEP's goals and outcomes is not simply dependent on how the AMEP operates. **Government policies** are crucial. The issues that impact on providers' performance against proposed KPI 1 (Participation), 3 (Retention) and, to some extent, 2 (Progression) could be mitigated by study allowances for participating in the AMEP. One of the main reasons students give for not completing AMEP entitlements is that they are seeking employment (*60% of students do not complete their entitlement to AMEP tuition ... because they actually do have some work obligations*, Tudge, 2020). Timely access to sufficient quality English language tuition helps prevent the learner's English stabilising in a form of "broken English", which is a significant barrier to employment at a person's actual skill level. The provision of a study allowance would incentivise adult migrant English learners to access and remain in the AMEP, especially newly arriving migrants. Evidence for this claim exists in the higher take-up and retention rates of refugees when they receive benefits on arrival in Australia.

Quality Assurance is referenced indirectly in the DHA *Request for Feedback* via the proposed KPIs. In addition to the issues just raised (section 1.2), ACTA members' input indicates that the implications for providers and teachers are unclear when benchmarks in KPIs 1 – 3 are not achieved. More generally, it is unclear how KPI data are used in evaluating, improving and reporting on individual provider performance and the AMEP overall.

ACTA believes that the function of the proposed KPIs in overall Quality Assurance requires consideration, discussion and clarification. In particular, the intense, detailed focus on learner assessments currently directed to verifying performance against proposed KPI 2 (Language Progression), together with costly auditing procedures, does not contribute to *actual* quality provision in the AMEP. Rather, it deflects providers and teachers from improving their teaching. Inappropriately narrow in focus, the high costs in time and resources attached to auditing assessments do not yield commensurate benefits.³ This focus on assessment has another dimension, namely its impact on curriculum, to which we return in section 2.3.

ACTA finds it difficult to understand why the NEAS AMEP Standards Manual (or its potential revision) has been disregarded in favour of KPIs that do not reflect or measure quality in English language provision. The Manual provides a comprehensive specification of Standards in such provision, encompassing educational resources, program delivery, program evaluation, professional and administrative staff, and premises. Most importantly, these Standards are *purpose-built* for English language provision. Providers have consistently reported to ACTA that these Standards, and the QA previously undertaken by NEAS, contributed substantively to improving their performance.

Two closely related issues are, first, that providers and teachers delivering English for adult migrants should have confidence that QA overall is conducted by recognised TESOL experts and, second, that the QA provider is disinterested in the performance of their QA role. In other submissions, ACTA has expressed our members' concerns about these issues, including the current combination of roles and potentially conflicting interests in a sole QA provider undertaking QA audits, providing professional development and advising the Department.

Finally, a fundamental issue is the relationship between quality considerations and the criteria used in awarding and retaining AMEP contracts. ACTA has frequently documented our concerns that, at times in the past, exemplary providers have lost contracts and that both poor and unproven providers have gained them. We respectfully submit that assurances that these problems have been addressed do not provide us with confidence that ensuring quality provision is the paramount criterion in awarding AMEP contracts. ACTA's previous proposals have offered a principled, efficient and cost-effective way of prioritising quality provision in AMEP contracting. We hope that our representatives might be given the opportunity to participate in an in-depth consideration of the merits (or otherwise) of these proposals.

ACTA recognises that determining the scope and focus of QA is not straightforward. Hence our proposal below for collaborative discussion between ACTA representatives and those determining the forthcoming AMEP RFT.

What is needed

ACTA strongly supports the need for measurable criteria by which both individual provider performance and the overall performance of the AMEP are judged.

³ Regarding narrowness, for example, to maximize efficient auditing the auditors require use of assessment tasks from the AMEP Task Bank, which necessarily lacks flexibility and discourages innovation (e.g. assessment using learner portfolios). Regarding the use of time and staff resources, evidence of student oral performance requires teachers to record and transcribe up to 10 minutes of spoken English. The accepted minimum time quoted by professional transcribers transcribing clear English 4 hours per 1 hour. For a teacher with a class of 20 students, this is an impossible requirement. See: [How Long Does It Take to Transcribe Audio? Turnaround Explained \(verbatim.ai\)](#). Aside from the workload, the key question here is whether this is an optimal use of teacher time and AMEP budgets, given its overall contribution to ensuring actual quality in AMEP provision..

We believe these criteria should be based on stated AMEP goals and outcomes. How these criteria and accompanying procedures advance these goals and outcomes should be clear and explicit.

We believe that further discussion would assist in determining:

- 1) the relationship between **AMEP goals, measurable outcomes, appropriate KPIs and Quality Assurance**, including their content and scope
- 2) how best to **promote and support quality performance** by individual AMEP providers and in the AMEP overall
- 3) how to **ensure confidence** in providers, Government and all stakeholders in the integrity of evaluating and reporting on the AMEP's performance.

2 Delivering flexible, quality, needs-based English language provision

English language provision in the AMEP is currently regulated by ASQA or equivalent VET/RTO requirements, most directly in relation to:

- 1) general obligations that apply to all RTOs regarding compliance, record keeping, industry consultation, students and reporting
- 2) teacher qualifications
- 3) curriculum accreditation.

2.1 RTO institutional requirements

Clearly, AMEP contract requirements should not duplicate general VET system audits in each State/Territory.

ACTA recognises that some aspects of the NEAS AMEP Standards Manual may appear to duplicate RTO requirements. However, as already stated, the advantage of the NEAS Standards is that they are purpose-directed. For example, Standards for educational resources relate to those appropriate for teaching English to adult migrants; Standards regarding administrative staff include staff competency in responding to existing and prospective students with little or no English, and those who have experienced torture and trauma, including working with interpreters; Standards relating to premises include culturally specific gender-related concerns.

A simple proposal for overcoming duplication that could be discussed is that RTO auditors accept reports by the AMEP QA provider on overlapping matters.

This solution relates to the following two issues. Both concern generic RTO requirements that do not support quality AMEP provision.

2.2 Teacher qualifications

The ACTA Adult ESOL Consultancy Group and those we represent firmly believe that requiring qualified AMEP teachers to hold and periodically upgrade the TAE Cert IV is a key contributor to the AMEP teacher shortage. A forthcoming upgrade requirement is liable to exacerbate this problem.

The TAE Cert IV requirement should not apply to AMEP teachers because it is:

- 1) designed for people with no previous teaching qualifications or experience, and is at a lower qualification level than the qualifications AMEP teachers must hold
- 2) competency-based to the point where some requirements run counter to best practice in language teaching

- 3) expensive and time-consuming to undertake
- 4) distracting from more productive investment by AMEP providers and individual teachers in relevant, quality professional development.

ASQA allows for higher qualifications to obviate the TAE Cert IV requirement. However, we are consistently informed that RTO employers enforce it for fear of not meeting overall RTO accreditation requirements.

What is needed

This problem is clearly resolvable. Action 4 in the **AMEP Action Plan** is that ASQA be requested to:

clarify, by including an explicit example, that AQF level 8 qualifications in teaching English as an additional language (EAL) which include attention to adult learning meet their requirements for skilled trainers and assessors.

ACTA proposes that:

- 1) ministerial collaboration and authority be used to implement the above Action 4
- 2) DHA, in developing the RFT and negotiating AMEP contracts with providers, *explicitly* specify:
 - a. the TESOL qualifications that must be held by AMEP teachers
 - b. that providers *should not* require AMEP teachers to hold and/or upgrade the TAE Cert IV.

A justification sometimes given for requiring AMEP teachers to undertake the TAE Cert IV is that it is useful in briefing new teachers about VET compliance requirements. This concern could be met through:

- 3) a professional development session that is tailored-made for incoming AMEP teachers.

2.3 ASQA and Victorian State VET curriculum accreditation requirements

The *EAL Framework*, which is now the AMEP national curriculum, is currently being revised to meet Victorian VET reaccreditation requirements.

Because the *EAL Framework* is accredited in Victoria, representation in that re-accreditation process is confined to Victorians and a DHA representative. We understand that the Department has asked LWA to coordinate feedback from all AMEP service providers on the draft 2024 EAL curricula. ACTA hopes that effective and comprehensive opportunities for input are prioritised for teachers in other States/Territories who are transitioning to the new curriculum.

To date, these opportunities have been constrained by the short timeframes for responding to each tranche of courses. The overlap with the end of the year and Christmas/New Year holidays was not optimal for gaining considered attention from teachers and provider managers, especially given their stressful year in coping with the continuing effects of the COVID pandemic.

An emerging concern for the ACTA Adult ESOL Consultancy Group is the template to which the revised curriculum must conform, which is unsatisfactory in guiding development of an evidence-based, needs-directed, best practice English language curriculum for AMEP learners.

A key problem is that the template is primarily directed to assessment that prioritises compliance above educational considerations.

This same focus also characterised the other accredited curricula used in the AMEP under the 2017-2023 contract. The problem is inter-connected with the concerns regarding Quality Assurance that we described in section 1.3.

A focus on meeting complex compliance-oriented assessment requirements is also a continuing source of frustration for AMEP teachers and a further disincentive to joining and remaining in that workforce.

ACTA has repeatedly criticised the prioritisation of assessment driven by a focus on compliance. Student dissatisfaction with this focus was also documented in two recent reviews of the AMEP by the Settlement Council of Australia.⁴

The proposed “AMEP Connect” and DHA *Request for Feedback* questions 1 - 3 stem, partly at least, from the need to circumvent RTO accreditation requirements in order to improve flexibility and needs-focused teaching in the AMEP. Alternatives that avoid RTO requirements may offer short-term solutions but inevitably will have their own unintended consequences. ACTA believes that the requirements themselves should be addressed and reformed.

We understand that these same problems have been identified by the current DEWR Foundation Skills Advisory Group. They would appear to be a key contributor to low take-up and high drop-out rates in the SEE Program and other accredited Foundation Skills courses.

It seems clear that, in some crucial respects, current RTO curriculum accreditation requirements do not support any of the Outcomes proposed by ACTA. Participation, English language learning, student satisfaction and provider quality are undermined in the following ways.

- 1) **Assessment is prioritised** over teaching. This does not promote student learning or consolidating what is being learned. It restricts teachers in responding to student learning needs. It discourages students and frustrates teachers.
- 2) **Assessment is rigid.** It is driven by evidence-collection requirements that do not contribute to program quality. These requirements are time-consuming, inefficient and costly for both providers and the AMEP overall.
- 3) **Professional development** for teachers is narrowly focussed on training in compliance rather than improving their teaching.
- 4) **The focus on compliance** discourages well-qualified and experienced teachers from teaching in the AMEP.

What is needed

ACTA supports the delivery of an accredited national curriculum in the AMEP. The newly reaccredited EAL Framework needs to reflect best practice in flexible, needs-directed English language provision.

Resolving the tension between meeting RTO accreditation requirements and delivering quality English teaching requires further discussion directed to:

- 1) agreeing on **short-term strategies** that will support the current EAL Framework accreditation process in delivering an optimal outcome
- 2) **raising awareness within relevant Government agencies** regarding the need to reform RTO accreditation requirements for language and literacy learning
- 3) **engaging stakeholders and Government agencies** in developing accreditation requirements that are fit-for-purpose for VET provision.

⁴ [SCOA AMEP Consultations - Report](#)
[SCoA-Submission-Adult-Literacy-Inquiry.pdf](#)

3 Quality AMEP provision: the need for stability

Essential to quality AMEP provision is a well-qualified, knowledgeable, experienced and committed teaching force that is supported by teaching resources and professional development.

The conditions that support the above have been progressively eroded by awarding AMEP contracts through competitive tendering. This system is not directed to serving Australia's immigration program through quality English language provision for adult migrants. Rather, it is antithetical to the stability and continuity underpinning quality and innovation. Quality performance is irrelevant to how contracts are awarded or retained.

Secure and stable employment for AMEP teachers is essential in promoting genuine innovation and flexible, targeted, quality responses to changes in Australian society, the economy and the migrant intake. It is a pre-condition for teachers and prospective teachers to invest in gaining and upgrading their qualifications, and to seek on-going professional development. Secure employment stimulates professional commitment and pride, and fosters professional leadership through career pathways. Security and stability allow teachers, managers and providers to plan, innovative and feel confident in responding to challenges. It is essential for real continuous improvement.

In contrast, the current contracting system incentivises cost-cutting, short-term thinking and risk aversion. The absence of secure employment in the AMEP is a major contributor to difficulties in retaining and recruiting teachers. The teaching force is almost entirely casualised or on short term contracts because providers are not secure in their contracts. A "fly-in/fly out" pattern of working across multiple venues and/or with different classes undermines teachers' ability to understand and respond to students' needs, and their effective contribution to the workplace. This way of working is a source of deep professional frustration for AMEP teachers. It is not attractive to prospective teachers.

The current contracting system for the AMEP prioritises compliance above quality provision, as already outlined in relation to curriculum in section 2.3. Professional learning in the AMEP is now almost entirely confined to briefing on compliance requirements. To the extent their members' fees allow, outside professional associations now carry the load in broadening and deepening teachers' professional knowledge and skills.

Insecure employment undermines the trust that permits robust communication between teachers and managers, and managers and the Department. Communication about how the AMEP is functioning at the grass roots is essential to efficiency, effectiveness and working collaboratively to resolve problems.

Competition for contracts inhibits collaboration between providers in serving students' best interests (e.g. through referrals) and working efficiently and cost effectively. It massively diverts resources and time at both provider and Departmental levels. Provider churn is wasteful of individual and institutional knowledge, and material and human resources. It impacts negatively on migrants' retention in the AMEP because students dislike transferring to a new provider.⁵ In many previous submissions, ACTA has documented this waste and disruption. Despite Departmental re-assurances that significant disruption will not occur with each new contract, the pattern has been repeated since this system began.

The current form of AMEP contracting allows these issues to be hidden. Questions asked in Senate Estimates when Labor was in Opposition, for example, routinely received replies that deflected responsibility for quality issues to individual providers.

ACTA hopes that the new Government will take the opportunity that now exists to reform the current contracting system. Its deleterious effects have been repeatedly described by providers and ACTA. Similar problems have been documented across many aspects of public sector provision and in the public administration literature. They have become even more salient in the wake of the COVID pandemic. ACTA

⁵ The impact on student retention was documented in the 2019 Social Compass review section 3.2.7

believes that the time is clearly overdue for placing this system under rigorous scrutiny. The goodwill and opportunity now exist for this scrutiny to be effective.

What is needed

Fundamental to reforming the AMEP is a change in the criteria and processes governing the award of contracts. Contracts should ensure, incentivise and reward quality provision. They should promote the stability that gives providers and teachers confidence that their commitment and professionalism is valued and will not be discarded or undercut. Accountability should be rigorous, transparent and clearly further these goals.

In previous submissions, ACTA has proposed criteria and processes in the award and retention of contracts that are directed to achieving stability, confidence and quality in the AMEP. We respectfully suggest that these proposals merit further discussion and scrutiny.

4 Supporting and enhancing female participation in the AMEP: Childcare

The AMEP is a crucial avenue to English for female adult migrants. The Social Compass review reported that, for 2013 – 2018:

There are twice as many female skilled migrants as there are male skilled migrants and nearly three times as many female family migrants as there are male family migrants.

The same pattern was reported in the ACIL Allen report (p. 33). We understand that female retention rates are also considerably higher than for males.

Crucial to these participation rates is free childcare provision through the AMEP, as both reports emphasized. The Social Compass review stated:

All stakeholder groups agree that the provision of free and accessible childcare is fundamental to the AMEP. Without childcare, many migrants, especially women, would not be able to attend classes or concentrate on learning. Across all focus groups, many students, particularly women, described childcare as key factor determining their access to English tuition.

I am using childcare before coming here, arranged by [service provider]. It is very helpful for my attendance and participation. —AMEP student

Twelve AMEP service providers stated in interviews and submissions that free childcare for AMEP is vital to supporting student access to the program. Five government agencies and nineteen community organisations also commented on the importance of childcare. One service provider noted that childcare also supports language acquisition in migrant children. (p. 75).

A Key Finding was:

The provision of free childcare is vital to many AMEP students' attendance and is a principal strength of the AMEP. (p. 76)

Childcare access within the AMEP should include excursions beyond the classroom. These are essential in building confidence, providing community and local orientation and experiencing authentic English.

Childcare provision is now accepted as crucial for all Australian families. It is also widely recognised that migrant and refugee families lack access to childcare at a higher rate than the general population. Childcare provision within the AMEP plays a vital role in redressing this inequity. In contrast, the fact that the SEE Program does not provide childcare is, we understand, one reason for its low participation and retention rates.

What is needed

ACTA acknowledges that there are significant complexities in funding childcare through the AMEP, as documented in both the ACIL Allen and Social Compass reviews.

In 2022 ACTA developed the attached *Early Childhood Education Principles* that argue for home-language based EAL approaches for young children. These principles could be drawn upon for quality childcare provision.

ACTA recommends that AMEP childcare be grounded in the following principles.

- 1) Childcare entitlements and access for AMEP students should be **maintained and enhanced**.
- 2) Future settings for childcare should support and **extend existing provision that is working well**, for example, provision of creches in AMEP Centres.
- 3) Future settings for childcare should take account of the language, literacy, cultural, emotional, administrative, eligibility and transport/travel barriers encountered by migrant families, and especially new arrivals, in **accessing mainstream entitlements** to childcare (notably, the Childcare Subsidy) and the **hidden extra costs** in:
 - (i) supporting access to mainstream provision (e.g. use of translators and HSP providers)
 - (ii) excluding women with young children from access to the AMEP.
- 4) Free access to quality childcare in the AMEP is recognised as **an essential contribution to equity, social cohesion, economic participation and educational outcomes** for adult migrants and their children.

ACTA recommends that a roundtable be convened to discuss, consider options and seek to arrive at an agreed method of funding free AMEP childcare provision, and that participants include:

- AMEP and HSP provider representatives
- representatives from the Settlement Council of Australia, ACTA and other relevant ECE advocacy groups
- AMEP and HSP Departmental officials
- relevant ministerial advisors
- other appropriate experts.

Concluding remarks

Since the AMEP began in 1948, Immigration Ministers have, on a bipartisan basis, consistently expressed their pride in the AMEP's contribution to Australia's immigration program.

More recently, however, the AMEP was subject to criticism by both Ministers and outside bodies.⁶ This criticism led to the Discussion Papers mentioned in the introduction to the DHA *Request for Feedback*.

⁶ See for example:

Joint Standing Committee on Migration (December 2017). *No One Teaches You to Become an Australian. Report of the Inquiry into Migrant Settlement Outcomes*. Parliament of the Commonwealth of Australia.

Scanlon Foundation (June 2019). *Australia's English Problem: How to renew our Once Celebrated Adult Migrant English Program*. [June2019 Scanlon-Institute Narrative-3.pdf \(scanloninstitute.org.au\)](#)

Shergold, Peter, Benson, Kerrin and Piper, Margaret (February 2019). *Investing in Refugees, Investing in Australia: the findings of a Review into Integration, Employment and Settlement Outcomes for Refugees and Humanitarian Entrants in Australia*. Commonwealth of Australia.

The central proposal was to incentivise a narrow range of AMEP outcomes by monetising them. Extensive consultations provided no evidence of stakeholder support for this proposal and clear evidence that it would not achieve the stated goals. ACTA commends the new Government for recognising this feedback and abandoning this proposal.

However, the purpose of our current ACTA submission is to demonstrate the need to move well beyond a simple reversal of previous counter-productive proposals. A unique opportunity now exists for the new Government's commitment to substantive and long-term economic and social reform to extend to reinstating the AMEP as world leader in English language provision for adult migrants.

Achieving this goal requires "re-setting" the AMEP to ensure that:

- 1) its architecture rests on valid, fair and reliable measures of outcomes, appropriate KPIs and comprehensive Quality Assurance – all of which clearly and transparently further the broad national goals of Australia's immigration program
- 2) it delivers flexible, needs-directed, best practice English language curriculum and teaching
- 3) the processes governing contracting are clearly directed to furthering the role of the AMEP in serving Australia's immigration program as a stable, quality English language program
- 4) it advances equity, social cohesion and educational opportunities for adult migrants and their children.

The need for this re-set is clear. How to get there is complex but well within reach.

ACTA hopes this submission demonstrates this need and what might be achieved through in-depth, collaborative reflection and discussion. We await your response with hope.

Coleman, D. (Minister for Immigration, Citizenship, Migrant Services and Multicultural Affairs) (2020, February 7) *Address to the Menzies Research Centre, Melbourne*. (Speech delivered by Alan Tudge, Acting Minister for Immigration, Citizenship, Migrant Services and Multicultural Affairs). <https://minister.homeaffairs.gov.au/davidcoleman/Pages/addressmenzies-research-centre-20200207.aspx>.

Centre for Policy Development (2020). *Putting Language in its Place: Improving the Adult Migrant English Program. A Discussion Paper*. [Putting-Language-in-Place-Media-Release.pdf \(cpd.org.au\)](https://cpd.org.au/putting-language-in-its-place-media-release)