



The Australian Council of TESOL Associations

FURTHER ADVICE

to

THE REVIEW TO INFORM A BETTER AND FAIRER EDUCATION SYSTEM

including

RESPONSES TO THE CONSULTATION PAPER

31 July 2023

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Abbreviations

ABC	Australian Broadcasting Commission
ACARA	Australian Curriculum, Assessment and Reporting Authority
ACTA	Australian Council of TESOL Associations
AERO	Australian Education Research Organisation
AITSL	Australian Institute for Teaching and School Leadership
AMEP	Adult Migrant English Program
CP	Consultation Paper (on the Review to Inform a Better and Fairer Education System)
EAL	English as an Additional Language
EAL/D (EALD)	English as an Additional Language or Dialect
ELP	(low) English language proficiency loading
ITE	Initial Teacher Education
LBOTE	Language background other than English
NAPLAN	National Assessment Program
NSRA	National School Reform Agreement
NSRB	National Schools Resourcing Board
NT	Northern Territory
PD	Professional development
SRS	Schooling Resource Standard
RATE	Remote Aboriginal Teacher Education
RN	(ABC) Radio National
TAFE	Technical and Further Education
TESOL	Teaching English to Speakers of Other Languages
WILE	Wellbeing and Indigenous Language Ecologies

INTRODUCTION

The Australian Council of TESOL Associations (ACTA) estimates that at least 600,000 English language learners from Aboriginal and Torres Strait Islander, migrant and refugee backgrounds in Australian schools require well targeted and resourced specialist teaching to support them in developing their English to meet the language and literacy demands of the mainstream curriculum.¹ This provision is a vital ingredient in Australia's commitment to a high-equity, high-quality schooling system that promotes all students' academic achievement, school completion, further learning, employment, civic participation and personal wellbeing.

In the last two decades, the national commitment, effort and capability through this equity provision has disintegrated. Learners of English as an additional language or dialect (EAL/D) disappeared as a national equity cohort in the 2008 Melbourne and 2019 Alice Springs (Mparntwe) education declarations. All responsibility for EAL/D provision has been devolved to States and Territories. Further devolved decision-making to schools through flexible use of their one-line budgets has seen needs-based loadings diverted, EAL/D teachers casualised, EAL/D learners taught by teachers with no specialist qualifications, and the near-universal disappearance of EAL/D-informed teaching in mainstream classrooms.

The failure to designate EAL/D learners as a national priority equity cohort disadvantages these students at every level from policy-making to programs to the classroom. It prevents accurate target group identification, resourcing, accountability and transparency.

As Australia emerges from the pandemic and resumes large scale immigration in the national interest, Commonwealth, State and Territory leadership is needed to restore Australia's leading role in EAL/D education by rebuilding effective EAL/D provision in Australian schools.

Since the late 1980s, ACTA has documented crucial issues and made constructive proposals to advance educational outcomes for EAL/D learners, most recently in our 2022 [National Roadmap for English as an Additional Language or Dialect \(EAL/D\) Education in Schools](#). We welcome the Review to Inform a Better and Fairer Education System.

Prior to the release of the Review Consultation Paper, ACTA prepared and submitted responses to the Review's five Terms of Reference. This Further Advice consists of our original submission (in sections entitled "Policy Questions"), plus answers to the questions in the Consultation Paper (entitled "CP Questions") where these are not in the original Policy Question sections.

We hope the Expert Panel will find our contribution useful in shaping the forthcoming National School Reform Agreement, which has the potential to turn the tide by including EAL/D learners within fair and equitable school provision.

¹ <https://tesol.org.au/how-many-english-as-an-additional-language-or-dialect-eal-d-learners-are-there-in-australian-schools/>

POLICY QUESTION 1: Targets and Reforms

What targets and reforms should be included in the next National School Reform Agreement (NSRA) to drive real improvements in student outcomes?

- 1. PROBLEM: Existing policies and provision misrepresent the educational requirements of learners of English as an additional language or dialect.**
 - 1.1 The NSRA does not recognise EAL/D learners as a national priority equity group. The result is that distinct EAL/D educational requirements are misrepresented, sidelined or ignored at all levels from Commonwealth/national to jurisdictions/systems to teacher education to schools to classrooms.
 - 1.2 Current policy arrangements misidentify Indigenous, refugee and migrant-background learners of English as an additional language or dialect (EAL/D) as having English literacy problems (e.g. as in NAPLAN data) and/or having cognitive or physical disabilities and/or as socioeconomically disadvantaged.
 - 1.3 Australian governments rely on the 'language background other than English' (LBOTE) identification combined with parents' highest education level (below Year 9) to determine low English language proficiency and to calculate equity loadings. The LBOTE identifier is not a valid English proficiency indicator, because (i) it conflates EAL/D learners with fluent (even monolingual) English speakers whose parents speak a language other than English,² and (ii) self-identification is inaccurate.³ At the jurisdictional level, the disaggregation of NAPLAN results in relation to LBOTE data is meaningless.⁴
 - 1.4 The SRS English language proficiency (ELP) loading is inadequate. It does not even cover the costs of initial basic English language teaching. The loadings are also untied: see Question 5 (p. 20) re accountability and transparency.
 - 1.5 The SRS loading for Aboriginal & Torres Strait Islander students does not acknowledge English language learners in remote Indigenous language speaking communities, who are not recognised as beginners in English when they enter school. The loading does not resource EAL/D professional development for teachers of Indigenous EAL/D learners, who are therefore excluded from this provision, at least in some jurisdictions.
 - 1.6 Misidentification creates educational disadvantage by failing to provide specialist EAL/D teaching that (i) recognises and builds on EAL/D learners' first/other language(s),⁵ (ii) develops strong oral English skills as a foundation for literacy in English, and (iii) targets the development of more advanced English for the English-medium curriculum.
- 2. SOLUTION: National identification of the EAL/D equity cohort (Indigenous, migrant and refugee background) to enable targeted reforms**
 - 2.1 Recognise all EAL/D learners (Indigenous, migrant and refugee background) as a national priority equity cohort within the NSRA and fund provision commensurate with their English language and literacy learning need.
 - 2.2 Develop and implement a comprehensive national performance framework to drive measurable reforms that develop education systems' capacity and transparent accountability for EAL/D learning and teaching, for example, along the lines of the Australian Health Performance Framework: see Appendix B.
 - 2.3 Replace the LBOTE identifier with an index that (i) explicitly identifies English language proficiency levels/stages/phases, and (ii) enables the EAL/D learner cohort to be identified and tracked within national data sets.

² Some (but not all) jurisdictions combine LBOTE identification with an English language assessment, which may or may not be based on an EAL/D-specific measurement tool. Even so, the LBOTE identification is unsatisfactory for the other reasons presented in this submission, including footnote 3 below.

³ Parents of EAL/D learners routinely do not register their child as from a Language Background Other than English because they fear that their child will be treated as remedial or 'not good at learning.'

⁴ Creagh, S. (2014). A critical analysis of problems with the LBOTE category on the NAPLAN test. *The Australian Educational Researcher*, 41(1), 1–23.

⁵ EAL/D learners may enter Australian schools at any age and Year Level. They range from being highly schooled and literate in other languages to having minimal/no previous formal schooling.

- 2.4 Within the Aboriginal & Torres Strait Islander cohort, identify learners of English as an additional language or dialect and ensure they are eligible for SRS ELP and State/Territory EAL/D loadings as per 2.1 and 2.3 above.
- 2.5 Reinstate, develop and resource effective bilingual/biliteracy/bicultural programs and employment of Aboriginal teachers and Assistant Teachers for Indigenous EAL/D learners in remote communities where Aboriginal and Torres Strait Islander languages are used in everyday life.⁶
- 2.6 Require the National Schools Resourcing Board (NSRB) to (i) review the ELP loading to determine the extent to which it reflects the cost of providing effective EAL/D instruction to learners, and (ii) recommend adequate resourcing levels for the next NSRA.
- 3. OUTCOMES: How will these solutions drive real improvements in EAL/D learner outcomes?**
- 3.1 Identifying EAL/D learners as a national priority equity cohort in the NSRA will authorise and drive:
- national identification of EAL/D learning needs in policies, planning and provision
 - accurate and transparent reporting of EAL/D outcomes over the next NSRA period
 - systematic, system-wide reform to address current barriers hindering effective EAL/D provision and achievement of learning outcomes by the EAL/D cohort across all schooling areas, including in literacy and numeracy
 - a coherent and comprehensive focus on language learning outcomes in the Closing the Gap Agreement that promotes productive interconnections between learning English as an additional language or dialect (which currently is not mentioned) and maintaining and developing Indigenous languages (Outcome 16).
- 3.2 A national EAL/D learner identifier will permit targeted decision-making for EAL/D provision and accurate monitoring of relevant learner outcomes, including towards achieving the National Goals of the Mparntwe Declaration. It will also support refinement of Closing the Gap outcomes.
- 3.3 Adequate resourcing of the ELP loading, coupled with accountability requirements, will assist schools to employ teachers equipped to target EAL/D learning outcomes. See also answers to Policy Questions 3, 4 and 5 below.

RELEVANT ACTA SUBMISSIONS

- Re the Productivity Commission NSRA Review: [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#) is a comprehensive response to every Review chapter. Section 1 presents extensive arguments for including Indigenous, migrant-background and refugee EAL/D learners as a national priority equity cohort.
- Re the ELP loading, see especially Action 1 in [Roadmap-for-English-as-an-additional-language-or-dialect-in-schools-ACTA-May-2022.pdf \(tesol.org.au\)](#)
- Re LBOTE as misidentification, see section 1.3 ff in [625 ACTA submission Review of Melbourne Declaration 14 June 2019.pdf \(tesol.org.au\)](#) and Submission [Submissions – Parliament of Australia \(aph.gov.au\)](#)
- Re the siloing of Indigenous languages and the failure to consider English language learning needs in the Closing the Gap Agreement, see [Submission 11 - Australian Council of TESOL Associations \(ACTA\) - Closing the Gap Review - Commissioned study \(pc.gov.au\)](#) and [Submission DR179 - Australian Council of TESOL Associations \(ACTA\) - Indigenous Evaluation Strategy - Project \(pc.gov.au\)](#)
- Re failures in meeting the needs of Indigenous language speakers in NT schools, see: [ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf \(atesolnt.org.au\)](#)
- Re a coherent approach to Indigenous languages and learning English, see [ACTA's Response to First Languages Australia paper Indigenous Languages Priorities 21 April 2023 - ATESOL NT](#)

⁶ In Indigenous language-speaking communities, Indigenous languages are needed for personal social, economic, physical or communicative purposes, including service delivery and employment. English is a foreign language only encountered in school.

RESPONSES TO CONSULTATION PAPER QUESTIONS (CHAP. 2)

ACTA submits the following in addition to the answers to Policy Question 1 above.

CP Question 1: Measuring important outcomes

Academic performance, attendance and engagement outcomes for Indigenous, migrant-background and refugee learners of English as an additional language or dialect (EAL/D) **cannot** be measured if these learners are misidentified as *Language Background Other Than English* students and/or as *below national minimum standards on NAPLAN* and/or as *Aboriginal and Torres Strait Islander* students. As detailed in this and other ACTA submissions, measurements based on these identifications are misleading and deleterious for learners, teachers and provision.⁷

Assertions that EAL learners are performing well and that the key issue is socio-economic disadvantage rests on LBOTE misidentification of these learners (see 1.3). The assertion is untestable without national data that correctly identifies these learners and their EAL/D proficiency levels. Research conducted by the NSW Department of Education indicates strongly that EAL/D learning needs should be considered separately.⁸

Both progress and learning outcomes for EAL/D learners must be measured using EAL/D-specific assessment tools and reported with reference to EAL/D proficiency phases/ stages/ levels (Beginning/ Emerging/ Developing/ Consolidating or equivalent).

However, work is required to improve the quality of EAL/D assessment: see 10.2, 10.3 and 13.2 below (pp. 17 and 20). The NSRA should include requirements for jurisdictions to report on provision for regular school-based and interschool moderation of students' work across the curriculum, including EAL/D proficiency assessments: see also answers to CP Questions 15, 16 and 17 (p. 16) and para. 11.3 (p. 17).

Jurisdictions provide little evidence that students' achievement in learning areas is valued. For example, an ACTA survey of jurisdictions' annual reports reveals that NAPLAN results appear to be the key aspect of student achievement which is monitored.

Conditional on correct EAL/D learner identification, accurate documentation of English proficiency levels, and employment of EAL/D-informed teachers (see Policy Question 3, p. 14), ACTA supports measurements of achievement in mainstream curriculum areas (Maths, Science etc.). EAL/D learners are more likely to demonstrate achievement in regular formative and scaffolded assessment tasks backed up by EAL/D-informed teaching, rather than in isolated standardised tests: see answer to CP Question 8 (p. 12) and Appendix A.

ACTA supports measuring student attendance. Attendance should be used to gauge system effectiveness in providing appropriate teaching and learning resources and/or working to re-engage students disengaged from school.

Documenting student engagement would be useful but we question how this can be validly and reliably measured.

⁷ Lingard, B, Creagh, S. & Vass G., 2012. Education policy as numbers: Data categories and two Australian cases of misrecognition. *Journal of Education Policy*, 27, 3, pp 315-333. Creagh, S. 2014. A critical analysis of problems with the LBOTE category on the NAPLAN test *The Australian Educational Researcher*, 41, 1, pp 1-23.

Wigglesworth, G, Simpson, J & Loakes, D. 2011, 'NAPLAN language assessments for indigenous children in remote communities: Issues and problems', *Australian Review of Applied Linguistics* (print edition), 34, 3, 320-343.

Angelo, D. 2012. Sad Stories. A preliminary study of NAPLAN practice texts analysing students' second language linguistic resources and the effects of these on their written narratives. In M. Ponsonnet, L. Dao & M. Bowler, M. (eds.), *Proceedings of the 42nd Australian Linguistic Society Conference – 2011, Australian National University, Canberra ACT, 5-6 December 2011*(27-57). Canberra, ACT: Australian Linguistic Society.

Dixon, S. & Angelo, D. 2014. Dodgy data, language invisibility and the implications for social inclusion: a critical analysis of Indigenous student language data in Queensland schools. *Australian Review of Applied Linguistics (ARAL)*, 37(3), 213-233.

⁸ In 2013, an analysis by the NSW Department of Education and Communities (DEC) concluded that the 'disadvantaged LBOTE' measure is not a reliable proxy for English language learning needs, because it is essentially a low SES measure, rather than an indicator of low English language proficiency, and does not identify the cohort which requires English language support. The analysis found that the disadvantaged LBOTE measure not only significantly underestimates the size of the cohort needing support but it also fails to capture the right students, and therefore should not be used to identify the ELP loading for EAL/D learners. These conclusions were reached by comparing disadvantaged LBOTE students to those with low ELP as gauged by the NSW DEC measure of English as a Second Language (ESL). The report concluded that the significant misalignment between 'disadvantaged LBOTE' and English language proficiency results in a misdirection of available targeted funding. It estimated that using 'disadvantaged LBOTE' as a proxy for English language proficiency would mean that 74.7 per cent of the \$100 million earmarked by SRS for limited English language proficiency would be misdirected to students who do not require EAL/D support. Statistics Unit, Centre for Educational Statistics and Evaluation, NSW DEC. (2013). *Improvements and Alternatives to the Disadvantaged LBOTE Measure Report* at: http://www.cese.nsw.gov.au/images/stories/PDF/Improvements_and_alternatives_to_the_Disadvantaged_LBOTE_measure.pdf.

CP Question 2: Evidence-based practices

Development of evidence-based languages pedagogies for First Nations students, including those who are EAL/D learners, must start from the 2020 [National Indigenous Languages Report | Office for the Arts](#).

Re teaching & curriculum resources: professional development is a higher priority: see answer to CP Questions 15, 16 and 17 below (p. 16).

ACTA is concerned that claims for evidence-based practices fail to include the comprehensive and substantive evidence demonstrating the effectiveness of EAL/D-specific pedagogies for Indigenous, migrant and refugee background learners.⁹ Long-standing, substantive evidence supporting quality bilingual/ biliteracy/ bicultural programs for mother tongue speakers of Aboriginal and Torres Strait Islander languages is also disregarded.¹⁰ These claims are being used to authorise misdirected provision: see 1.6 above (p. 4).

Current examples of claims for narrowly and frequently inappropriately focussed evidence are reports by AERO, the 2023 Teacher Education Expert Panel discussion paper and final report,¹¹ and advocacy for the “science of reading”, all of which explicitly or implicitly endorse system-wide adoption of expensive, commercially developed, monolingual English literacy packages. These packages are not simply ineffective. They are deleterious for EAL/D learners because they deflect attention (and time) from developing oral English as a basis for English literacy, they deliberately exclude the background knowledge necessary for comprehending and producing written texts, and they do not support learners’ development of the academic English they need to succeed at school.¹² Recent indirect but authoritative evidence for the failure of these approaches for Indigenous languages speakers in the Northern Territory can be found in the NT Court’s written statement to ABC RN’s Law Report (23/07/23) that:

younger defendants from Indigenous communities now appear less likely to have a working command of English than older people from the same area.

[01/ Justice, but not in my language - ABC Radio National](#)

See Appendix A for evidence-based criteria for effective EAL/D provision.

Re different EAL/D cohorts: see the ACARA English as an Additional Language or Dialect Teacher Resource.¹³ These different EAL/D learner groups require quite different teaching approaches, as this resource indicates.

CP Question 3: Students at risk of falling behind

Learners of English as an additional language or dialect can thrive as bi/multi-linguals but are put at risk of “falling behind” when:

- they are denied intensive EAL/D pedagogy by qualified EAL/D teachers in their early English learning stages
- they are taught using pedagogies which do not recognise their starting points in home or other language(s) and which pay insufficient attention to developing oral English (see above)
- the time required to progress beyond basic spoken English is not recognised¹⁴
- no consistent support is provided to access the mainstream curriculum: see 4.5 and 4.6 below (p. 9)
- it is assumed that these learners require less challenging “simplified” teaching in contrast to “high challenge” teaching coupled with “high support”.¹⁵ See Appendix A.

The evidence is clear across the board that teaching is less effective in larger classes. EAL/D beginners should not be in classes larger than approximately 15 students.¹⁶

⁹ See, for example, [English as an additional language or dialect \(EAL/D\) effective school practices \(nsw.gov.au\)](#). This research is summarised in Appendix A.

¹⁰ See, for example:

Devlin, B., Disbray, S., & Devlin, N. (Eds.) (2017). *History of bilingual education in the Northern Territory: People, programs and policies*. (Language Policy; Vol. 12). Springer Singapore. <https://doi.org/10.1007/978-981-10-2078-0>

Silburn SR, Nutton GD, McKenzie JW and Landrigan M, 2011. Early years English language acquisition and instructional approaches for Aboriginal students with home languages other than English: A systematic review of the Australian and international literature. The Centre for Child Development and Education, Menzies School of Health Research, Darwin, NT. Available at: [Territory Stories - Territory Stories \(nt.gov.au\)](#)

¹¹ [Strong Beginnings: Report of the Teacher Education Expert Panel - Department of Education, Australian Government](#)

¹² The loss of EAL/D expertise has reduced authorities’ capacity to resist pedagogies aggressively promoted by commercial interests in marketing expensive literacy packages. See Hogan, Anna & Lingard, Bob (2019). Teachers’ perceptions of commercialisation in Australian public schools: Implications for teacher professionalism. In Deborah M. Netolicky, Jon Andrews, & Cameron Paterson (eds.). *Flip the System Australia: What Matters in Education*. Routledge. [Teachers’ perceptions of commercialisation in Australian public schools - UQ eSpace](#)

CP Questions 4 and 7: additional cohorts

The substance of this and numerous other ACTA submissions is that including EAL/D learners as a priority equity cohort will provide significant benefits to these students and help tackle the increasing inequity in Australian education. In the absence of this recognition, disadvantage and dysfunctional provision for EAL/D learners will continue.

Reporting should be as per our answers to Policy Question 1 and CP Question 1 above and within the framework outlined in Appendix B.

CP Question 5: targets for primary vs secondary schooling

For EAL learners, targets must be appropriate to both (i) Year levels and (ii) the English language level at which students enter Australian schools. Most EAL/D-specific assessment tools differentiate specifications of English proficiency in relation to three schooling Year Levels (K-2, 3-6 and 7-9/12). See footnote 5 above. Most also account for learners with minimal/no previous schooling entering school beyond Year 2. For these reasons, EAL/D-specific assessment tools should be used to measure achievement of targets.

CP Question 6: flexible responses

The problem for EAL/D learners is that “flexible” responses are the means by which jurisdictions avoid responsibility and transparency for appropriate provision: see our answers to Policy Questions 4 and 5 (pp. 17-21).

“Allowing jurisdictions and schools the flexibility to respond to individual student circumstances and needs” will be achieved if the NSRA ensures that teachers have the necessary expertise in understanding EAL/D learning needs and using relevant pedagogies in the classroom.

‘Decodable reading pedagogies’ include assessing EAL/D learners on their ability to ‘read’ sounds that are represented graphophonically in confusing, deliberately decontextualised lists of pseudo-words mixed with authentic English words. EAL/D children are unaware that the pseudo-words are not English (or from any language). These approaches assume that learners are orally fluent in English. No account is taken of their home language phonology, which will inevitably make different sound distinctions. Comprehension is not assessed. EAL/D learners, including Indigenous children, can also be intimidated by these assessments that occur one-on-one, often away from the class, by a person who may not be the child’s teacher but a teacher’s aide or other classroom ‘helper’. The resulting data on poor performance authorises diagnoses and inappropriate pedagogies described in paras. 1.2, 1.6, 4.1, 4.2.

See: <https://www.language magazine.com/2023/05/22/english-literacy-for-multilingual-learners-voices-from-the-field/>

¹³ See pp. 6-7 for a listing of the different cohorts. [Microsoft Word - EALD Overview and Advice revised February 2014 \(acara.edu.au\)](https://www.acara.edu.au/microsoft-word-eald-overview-and-advice-revised-february-2014)

¹⁴ Creagh, S. (2014). A critical analysis of problems with the LBOTE category on the NAPLAN test. *The Australian Educational Researcher*, 41(1), 1–23.

Creagh, S., Kettle, M., Alford, J., Comber, B., & Shield, P. (2019) How long does it take to achieve academically in a second language? Comparing the trajectories of EAL students and first language peers in Queensland schools. *Australian Journal of Language and Literacy*, 42(3), 145-155. <https://doi.org/10.1007/BF03652034>

Collier, V. (1987). Age and rate of acquisition of second language for academic purposes. *TESOL Quarterly*, 21 (4), 617– 641.

Collier V. (1989) How Long? A synthesis of research on academic achievement in a second language. *TESOL Quarterly*, 23(3), 509-531.

Collier V.P. & Thomas, W.P. (1989). How quickly can immigrants become proficient in school English? *Journal of Educational Issues of Language Minority Students* 5, 26–38.

Collier V. P. & Thomas, W. P. (2002) *A National Study of School Effectiveness for Language Minority Students' Long-Term Academic Achievement*. Centre for Research on Education, Diversity and Excellence, US Department of Education (check)

Collier & Thomas (2017) Validating the Power of Bilingual Schooling: thirty-two years of large scale longitudinal research *Annual Review of Applied Linguistics*. Cambridge University Press. Cambridge, UK.

Demie, F. (2013). English as an additional language pupils: How long does it take to acquire English fluency? *Language and Education*, 27(1), 59–69.

Hakuta, K., Butler, Y.G., & Witt, D. (2000). *How long does it take English learners to attain proficiency?* Santa Barbara: The University of California Linguistic Minority Research Institute Policy Report 2000–1.

Kieffer, M.J. (2008). Catching up or falling behind? Initial English proficiency, concentrated poverty, and the reading growth of language minority learners in the United States. *Journal of Educational Psychology*, 100(4), 851–868.

¹⁵ See Finding 2 in [English as an additional language or dialect \(EAL/D\) effective school practices \(nsw.gov.au\)](https://www.nsw.gov.au/english-as-an-additional-language-or-dialect-eald-effective-school-practices):

High support classrooms provide scaffolding through planned and contingent or point-of-need use of oral language, targeted use of home language and vocabulary development, and explicit and embedded teaching of language and literacy across the curriculum. Teachers' knowledge of EAL/D pedagogy is evident throughout classroom observations: strong elements observed within lessons include academic language focus, explicit teaching and scaffolding. Some of the key practices related to effective EAL/D scaffolding include the use of contingent support offered through verbal interactions, and a careful balance between whole class instruction and student group or independent work, with group membership differentiated according to the needs of English language learners. (p. 52)

¹⁶ ACTA has been informed that classes can be as large as 25 students in remote Indigenous language communities and that feelings of insecurity and inability to connect with the teacher are reasons for subsequent non-attendance.

For research evidence on class size for language learners, see, for example:

[How Many Students per Class? | Foreign Language Teaching Methods: Classroom Management \(utexas.edu\)](https://www.utexas.edu/actfl/class-size-as-a-factor-influencing-language-learning)
[ACTFL | Class Size as a Factor Influencing Language Learning](https://www.actfl.org/class-size-as-a-factor-influencing-language-learning)

POLICY QUESTION 2: Student Wellbeing

How can the next NSRA contribute to improving student mental health and wellbeing by addressing in-school factors while acknowledging the impact of non-school factors on wellbeing?

4. **PROBLEM: Existing provision is weak and highly variable in identifying and supporting EAL/D learners' mental health and wellbeing.**
- 4.1 *Language-mediated wellbeing* and its impact on schooling outcomes is entirely missing from considerations of student wellbeing.¹⁷
- 4.2 Policies and programs that misidentify Indigenous, refugee and migrant-background EAL/D learners as having cognitive, physical and/or literacy deficits (see 1.1-1.6 above, p. 4) undermine their confidence, wellbeing and sense of self-worth.
- 4.3 Targeted teaching that fosters the wellbeing and builds the confidence of Indigenous, refugee and migrant-background learners in realising their academic potential has been undermined by the sustained erosion of designated EAL/D provision in schools and the adoption of unsuitable literacy pedagogies: see Introduction, 1.6, CP Question 2 above and 7.3 below (pp. 3, 7 and 14).
- 4.4 NAPLAN assessments position EAL/D learners as failures when they are in Beginning and Emerging Phases of the ACARA *EAL/D Progression* (or equivalent), because they pre-suppose English proficiency above learners' English level. Demoralising experiences of NAPLAN play a significant role in Indigenous learners' alienation from schooling, most notably in communities where Standard Australian English is not used in everyday interactions.¹⁸
- 4.5 From mid-primary years upwards, Indigenous, refugee and migrant background EAL/D learners who have achieved superficial fluency in everyday oral English flounder, fail and disengage without structured input on developing the increasingly complex academic oral and written language of the mainstream curriculum.¹⁹
- 4.6 Refugee students with minimal/disrupted/no previous formal schooling arrive in Australia with extremely high motivation to access and succeed in their schooling. They face insurmountable challenges when placed in age-appropriate mainstream classes with insufficient preparation and expert EAL/D teaching, and poor recognition of the challenges they face in adjusting to formal schooling. Disengagement is liable to follow.
- 4.7 Due to a lack of face-to-face teaching and often little/no access to computers at home, COVID has disproportionately impacted the English language and literacy learning of refugee and migrant-background EAL/D learners, especially those who experienced the long and harsh lockdowns in the outer metropolitan suburbs of Sydney and Melbourne. With ongoing teacher shortages and disruptions to classes, the difficulties they experienced during the COVID pandemic have been exacerbated.
- 4.8 Educational policies and programs directed to respecting Indigenous and migrant culture(s) are mostly silent on the crucial role of first/home/community languages in maintaining personal, intergenerational and community wellbeing, mental health and sense of worth.²⁰ They ignore the role of language use and revitalization as protective factors in the health of Indigenous and migrant populations.²¹ They downplay

¹⁷ Where Indigenous children are brought up in communities that speak their mother tongue, Indigenous languages are considered "healthy" according to Worrall, A. (2014). *Living Indigenous Languages*. <https://rightnow.org.au/opinion/living-indigenous-languages/>

¹⁸ This alienation is movingly depicted in the award-winning film *In My Blood It Runs* when the Aboriginal boy silently cries looking at his report card. Another scene depicting the administration of a NAPLAN test is repeated in many schools with Indigenous English language learners, when the teacher tells the students they have a statistical chance of getting an answer right if they tick one of the boxes in every question.

See also: Macqueen, S., Knoch, U., Wigglesworth, G., Nordlinger, Singer, R., McNamara, T., & Brickle, R. 2019. The impact of national standardized literacy and numeracy testing on children and teaching staff in remote Australian Indigenous communities. *Language Testing*, vol. 35, 2: pp. 265-287.

¹⁹ Creagh, S., Kettle, M., Alford, J. et al. How long does it take to achieve academically in a second language? Comparing the trajectories of EAL students and first language peers in Queensland schools. *AJLL* 42, 145–155 (2019). <https://doi.org/10.1007/BF03652034>

²⁰ A recent clear example is the Productivity Commission's 2022 Review of the National School Reform Agreement: see pp. 25, 27, 29, 37, 38, 99, 100, 119, 122, 126, 127, 129, 130, 138, 139, 161, 205. For a tokenistic exception, see p. 174.

²¹ In contrast, see Angelo, D., O'Shannessy, C., Simpson, J., Kral, I., Smith, H., & Browne, E. (2019). *Wellbeing and Indigenous Language Ecologies (WILE): a strengths-based approach: Literature review, National Indigenous Languages Report, Pillar 2*.

the value of two-way bilingual, biliteracy, bicultural programs that value and respect home and community languages and cultures.²² See also 4.1 and 4.4 above (p.9).

- 4.9 For First Nations students in remote communities, boarding schools are now the main or only pathway to post-primary education. Transparency is lacking about those who discontinue from boarding schools and return to their communities with a sense of failure, diminished prospects, and increased risk of poor mental health and suicide.²³
- 4.10 The current emphasis on student mental health and wellbeing risks lowering teachers' and schools' expectations of EAL/D learners' potential to achieve academically, and deflects efforts from the need for quality teaching and programs.²⁴

5. SOLUTION: Strategies that target the personal and academic wellbeing of EAL/D learners

In addition to the reforms proposed in 2.1-2.6 (pp. 4-5):

- 5.1 Ensure that national initiatives to promote student mental health and wellbeing include strategies that explicitly address the in-school factors impacting the wellbeing of migrant, refugee and Indigenous EAL/D learners, including provision directed to advancing their academic aspirations and potential, and a targeted program of learning recovery from COVID.
- 5.2 Authorise and resource EAL/D curriculum, resources, pedagogy and assessment that recognise, value, respond to and build from what EAL/D learners know about language(s) and literacy.
- 5.3 Develop and resource a comprehensive, coherent and integrated approach to Indigenous language maintenance, recovery and learning, and EAL/D learning, in schools. Ensure that this approach is informed by the *National Indigenous Languages Report*.²⁵
- 5.4 Ensure refugee students with minimal/disrupted/no previous formal schooling can access specialist age-appropriate programs. For those over 16, develop targeted guidance and flexible entry to programs and pathways through schools, the AMEP and TAFE guided by what is locally feasible and appropriate.
- 5.5 As part of any national initiative to support development of whole school wellbeing programs and expertise, ensure that classroom teachers receive professional development in (i) recognising the effects of trauma and torture, and (ii) knowing how to refer students to appropriate local counselling support.
- 5.6 Map indicators of mental health and wellbeing of equity cohorts against a wellbeing framework that requires reporting through local student tracking tools and a national report card.

²² Reviewing international evidence, Baker (2007) reports:

Strong forms of Bilingual Education have cost benefits e.g. dropout rates, the number of children repeating grades. 'Strong' forms of bilingual education provide higher levels of achievement in less years of... [word missing].

Baker, Colin. (2007) Becoming bilingual through bilingual education. In Peter Auer & Li Wei (eds.). *Handbook of Multilingualism and Multilingual Communication*, pp. 131-154. Berlin, New York: De Gruyter Mouton. <https://doi.org/10.1515/9783110198553.1.131>

See also:

Cummins, J. (2000). Language Power and Pedagogy: Bilingual Children in the Crossfire. Ch. 7 (The Threshold and Interdependence Hypothesis revisited).

Garcia, O. (2009). *Bilingual Education in the 21st Century. A Global Perspective*. Wiley-Blackwell.

²³ Since 2015, First Nations boarding school attendance has increased by 53%: *Boarding off Country* (2020) https://caepr.cass.anu.edu.au/sites/default/files/docs/2020/9/NT_Ed_Study_2020_7_Sept_1.pdf.p.6.

Students in boarding schools are disconnected from their communities, sometimes even leaving their own State or Territory. ACTA's advice is that these students are frequently placed in a total English-speaking environment with no account paid to their culture, experience and EAL/D learning needs. Teachers can be ill-prepared – even shocked – to find students from remote Indigenous communities in their classes, as are also their fellow-students.

²⁴ For discussions of this problem, see:

Windle, J. A., & Miller, J. M. (2013). Marginal integration: the reception of refugee-background students in Australian schools. In L. Bartlett, & A. Ghaffar-Kucher (Eds.), *Refugees, Immigrants, and Education in the Global South: Lives in Motion* (pp. 196 - 210). Routledge.

Alford, Jennifer & Kettle, Margaret (2021). Defining bilingualism, multilingualism and plurilingualism in education: Innovations in teaching for diversity in mainstream classrooms. In Arber, R.E., Weinmann, M., & Blackmore, J. (Eds.) *Rethinking Languages Education: Directions, Challenges and Innovations*. Routledge, Abingdon, Oxon, pp. 167-178.

²⁵ Angelo, D., O'Shannessy, C., Simpson, J., Kral, I., Smith, H., & Browne, E. (2019). Wellbeing and Indigenous Language Ecologies (WILE): a strengths-based approach: Literature review, National Indigenous Languages Report, Pillar 2.

See also:

Dinku, Y., Markham, F., Venn, D. Angelo, D., Simpson, J., O'Shannessy, C., J. Hunt, J. & Dreise, T. (2020) 'Language use is connected to indicators of wellbeing: Evidence from the National Aboriginal and Torres Strait Islander Social Survey 2014–15.'

6. OUTCOMES. How will these solutions drive real improvements in EAL/D learner outcomes?

- 6.1 Timely and targeted expert EAL/D teaching will respond to and build on EAL/D learners' high initial levels of motivation to ensure their school engagement, achievement and completion.
- 6.2 Relative to programs directed to remedying health and wellbeing issues, language programs for Indigenous students promise greater cost effectiveness.²⁶

RELEVANT ACTA SUBMISSIONS

Re the crucial role of languages in Indigenous wellbeing, see section 1.2 of [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#).

Re the effects of COVID on migrant and refugee EAL/D learners, see p. 5 and Action 9 in [Roadmap-for-English-as-an-additional-language-or-dialect-in-schools-ACTA-May-2022.pdf \(tesol.org.au\)](#):

Re learning the English of the mainstream curriculum and going beyond fluent oral English, see p. 17ff in [625 ACTA submission Review of Melbourne Declaration 14 June 2019.pdf \(tesol.org.au\)](#)

Re the adverse impact of NAPLAN, especially on Indigenous EAL/D learners and consequent educational provision, see Problems 2 & 7 in [ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf \(atesolnt.org.au\)](#) and Submission 241 to the Parliamentary Inquiry into the administration and reporting of NAPLAN testing [Submissions received by the Committee – Parliament of Australia \(aph.gov.au\)](#)

Re what can be achieved in bilingual/bicultural/biliteracy programs for Indigenous EAL/D learners, see Problem 4 in 2021/2 [ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf \(atesolnt.org.au\)](#)

Re meeting the needs of refugee youth with minimal/no previous formal schooling, see sections 3.6 & 4.4 in Submission 108 to the 2017 Inquiry into Migrant Settlement Outcomes [Submissions – Parliament of Australia \(aph.gov.au\)](#)

²⁶ Whalen DH, Lewis ME, Gillson S, McBeath B, Alexander B, Nyhan K. Health effects of Indigenous language use and revitalization: a realist review. *Int J Equity Health*. 2022 Nov 28;21(1):169, p. 9. doi: 10.1186/s12939-022-01782-6. PMID: 36437457; PMCID: PMC9703682

RESPONSES TO CONSULTATION PAPER QUESTIONS (CHAP. 3)

ACTA submits the following in addition to the answers to Policy Question 2 above.

CP Question 8: Supporting student health and mental wellbeing

ACTA believes that the core of wellbeing for students in schools is achievement-based. As indicated in answers to Policy Question 2 above, we are concerned that the current focus on wellbeing may weaken the attention of the Commonwealth and State & Territory governments, jurisdictions, schools and teachers to quality programming and teaching.

Our concern regarding the lack of attention to language-mediated wellbeing, and its relationship to achievement-based wellbeing has been heightened by the final report of the 2023 Teacher Education Expert Panel. Its sole recommendation regarding EAL/D learners is that trainee teachers need to learn “cultural responsiveness” (which is also bracketed with “support” for those with a “disability”).²⁷ This characterization of the expertise needed to teach EAL/D learners is profoundly inadequate: see also 7.6 and answers to CP Questions 26 and 27 below (pp. 14 and 19) and Appendix A.²⁸

The loss of targeted provision when English learning needs are not recognized in their own right is exemplified in jurisdictions where language consultants have been re-assigned to promote “inclusion”.

For First Nations students, including EAL/D learners, we reiterate that the National Indigenous Languages Report, Pillar 2 must underpin the development of programs to promote their wellbeing.²⁹

Further to 4.4-4.6 (p. 9), EAL/D learners are genuinely distressed when struggling with NAPLAN tests if they lack the English level and/or the background knowledge invalidly assumed by the test. They are also demoralized by reporting based on NAPLAN data or in relation to English mono-lingual peers (e.g. “X has only Grade 2 English”). Conversely, these learners gain confidence and can excel in subject area learning when they receive EAL/D-informed teaching and positive feedback on their progress using appropriately targeted assessment.³⁰ See Appendix A.

School autonomy policies have made principals the cornerstone of effective support for student and staff wellbeing. Despite a full chapter on school leadership in the Productivity Commission’s NSRA Review, the Consultation Paper is disappointing in its minimal focus on principals’ key role in instituting and maintaining a safe and positive school climate. The evidence is overwhelming that principals are crucial in creating respect and support for students’ languages and cultures, communicating with carers and communities and – most crucially – employing appropriate teachers, including teachers with EAL/D expertise, and First Nations teachers and Assistant Teachers. It is essential to a school’s wellbeing that principals are knowledgeable, consultative, empathetic and supportive of their staff. They are key to creating school environments which facilitate and encourage teachers to collaborate, support each other and engage in continual quality improvement:³¹ see Appendix A, also answers to CP Questions 15, 16 and 17 re prioritizing professional development (p. 16). At minimum, principals should be required to undertake regular professional development that includes broadening their cross-linguistic and -cultural knowledge and skills.³²

²⁷ [Strong Beginnings: Report of the Teacher Education Expert Panel - Department of Education, Australian Government](#), pp. 9; 28 & 29.

²⁸ The following email extract from a teacher educator working to support a teacher in a Melbourne school eloquently depicts the inadequacy of “cultural responsiveness”:

I am working very closely with an educated, very pro-multilingualism, diversity & inclusion secondary teacher who is doing everything she can to work from a strengths/assets-based approach but ... although the teacher is smart and is learning quickly on the job (third year teaching), she simply does not have the depth of EAL knowledge that not only experienced but also very effective EAL teachers need to help support the diversity of needs that are common in Australian classrooms. ... There is no ongoing mentorship when they are in schools and we all know the PD sessions offered in schools are not based around knowledge building. ... Even with her incredibly warm and inclusive attitudes towards all EAL students, once I mention anything about Indigenous students, I can see she is mentally and emotionally too stretched to take in anything I am saying. ... We have a generation of young teachers, who are passionate, smart, and motivated, but simply lack the foundational language and literacy knowledge and support they need to help expand students’ linguistic repertoires, not only for academic success but also for their social development.

²⁹ Angelo, D., O’Shannessy, C., Simpson, J., Kral, I., Smith, H., & Browne, E. (2019). Wellbeing and Indigenous Language Ecologies (WILE): a strengths-based approach: Literature review, National Indigenous Languages Report, Pillar 2. [Microsoft Word - NILR LitReview FINAL_29July2020_c.docx \(anu.edu.au\)](#)

³⁰ An example of what ACTA is advocating for is the Victorian Tools to Enhance Assessment Literacy for teachers of English as an Additional Language (TEAL): [Tools to Enhance Assessment Literacy | For Teachers of English as an Additional Language \(global2.vic.edu.au\)](#)

See also [English as an additional language or dialect \(EAL/D\) effective school practices \(nsw.gov.au\)](#)

³¹ <https://education.nsw.gov.au/about-us/education-data-and-research/cese/publications/research-reports/eald-effective-school-practices>

³² ACTA’s submission to the Productivity Commission NSRA Review provided a detailed analysis of the role of school leadership in creating a positive learning environment for EAL/D learners: see section 6 of [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#).

School autonomy has diminished the potential for local transparency in regard to teacher and student wellbeing. Jurisdictions should resume greater oversight and capacity to assist schools in forestalling and overcoming difficulties. Jurisdictions must routinely ensure that (i) students, their carers and teachers know how to access alternative advice and support if a school is failing to promote student safety and wellbeing, and (ii) both school and outside support is highly accessible, conscious of cultural norms, and in languages other than English. Key teaching and administrative staff should be trained in accessing and using interpreters. The NSRA should mandate explicit reporting at school and jurisdiction level on provision of accessible information to students and carers, including use of interpreters and in languages other than English.

CP Question 10: a wellbeing target in the NSRA

ACTA supports a wellbeing NSRA target but this support is conditional on the Panel's attention to our answer to Question 8 (p. 12).

CP Question 11: surveying students

Yes, students should be surveyed. Surveys should be disconnected from NAPLAN because of the stress the test can induce in students.

CP Questions 12 and 14: school leaders and teachers.

See 5.1 and 5.5 and answer to Question 8 above (pp. 10 and 12).

CP Question 13: partnerships

These should include local interpreter services, trauma and counselling services (including for refugees) and local community services.

Developing partnerships requires time. It requires investing in human and financial resources in both schools and partner organisations.

POLICY QUESTION 3: Teachers

How can the next NSRA support schools to attract and retain teachers?

- 7. PROBLEM: Systemic barriers are preventing the retention and recruitment of teachers to meet the needs of EAL/D learners**
- 7.1 Generic proposals to attract and retain teachers ignore specific areas of expertise, including EAL/D specialists and EAL/D-informed mainstream teachers.³³ Teacher workforce planning in jurisdictions is yet to focus on retention and recruitment of these teachers.
- 7.2 Mainstream teachers with classes that include Indigenous, refugee and migrant-background EAL/D learners are currently ill-equipped to meet their learning needs. A lack of support and teachers' consequent feelings of inadequacy are contributing to dissatisfaction, burn-out and resignations across the board.
- 7.3 Policies promoting flexible school-based resource management and staffing in school global budget allocations have decimated specialist EAL/D provision. EAL/D teaching positions have been casualised and/or staffed with teachers lacking EAL/D teaching qualifications. Qualified and experienced EAL/D specialists have been re-deployed to other duties, resigned or retired. These problems intensified when borders closed due to the COVID pandemic and are not being reversed. This situation is contributing to EAL/D teacher dissatisfaction, burn-out and resignations. The absence of specialist EAL/D teachers is also contributing to mainstream teacher burn-out and attrition: see 7.2 above.
- 7.4 Education authorities do not recruit and employ specialist EAL/D teachers or offer incentives for teachers to gain EAL/D specialist qualifications. State and territory authorities regulating and accrediting teacher employment and qualifications do not require EAL/D expertise. AITSL's *Professional Standards for Teachers* do not identify EAL/D competencies needed by mainstream teachers, much less specialist EAL/D teachers.
- 7.5 Commonwealth grants for initial teacher education enrolments can be diverted by university managements to cross-subsidise other higher profile areas within the university. No funding is earmarked to support a pipeline of EAL/D specialist or EAL/D-trained mainstream teachers in Initial Teacher Education or at higher levels.
- 7.6 Because of the lack of demand from employers (see 7.3 above), teacher education faculties have reduced or discontinued content on EAL/D in the Australian context, and now focus on generic approaches to inclusiveness, English mother tongue literacy and the lucrative market of international students seeking post graduate TESOL qualifications. Re "inclusiveness", see answer to CP Question 8 above (p. 12). Re the impact on accurate data collection, see 10.3 below (p. 17).
- 7.7 To ACTA's knowledge, suitable teacher education for Indigenous teachers from remote communities no longer exists anywhere in Australia.³⁴
- 8. SOLUTION: Strategies to target systemic barriers preventing retention and supply of EAL/D trained teachers.**

In addition to Solutions 2.1 – 2.6 (pp. 4-5), the next NSRA should:

- 8.1 Require jurisdictions to look beyond the current teacher shortage in their teacher workforce planning, and present a longer-term vision that includes reversing the decimation of expertise in EAL/D teaching, and the retention and recruitment of EAL/D specialist teachers.
- 8.2 Address Rec 8 of the Parliamentary Inquiry into Adult Literacy.³⁵

³³ This silence applies to most specialist teaching areas except STEM subjects. The needs of equity cohorts, including EAL/D learners, do not figure in discussions about teacher shortages.

³⁴ ACTA understands that Bachelor of Education programs, for example, at Charles Darwin University and Batchelor College in the NT have no provision to develop learners' English to the level necessary for study and teaching and therefore do not cater for First Nations EAL/D learners who wish to qualify as teachers. The NT on-site Remote Aboriginal Teacher Education (RATE) program is not a pathway to a teaching qualification for Aboriginal Assistant Teachers, who teach in the local language mentored by a qualified teacher. Certificates I-IV in "education support work" train teachers' aides. Currently, we have no information on teaching qualifications suitable for remote Indigenous language speakers in other jurisdictions.

³⁵ The Australian Government [should] seek the agreement of the states and territories to:

- 8.3 Require AITSL to include standards in the *Australian Professional Teaching Standards* that are specifically related to teaching EAL/D learners, and teacher regulation authorities to comply with these revised Standards.³⁶
- 8.4 Require teacher education institutions to address these revised Standards in Initial Teacher Education core content.
- 8.5 Ensure 'ring-fenced' funding for teacher education faculties, including dedicated funding within the Universities Accord for EAL/D specialist and EAL/D-informed mainstream teachers, accompanied by public reporting requirements on the use of this funding, with details of specific courses and enrolments
- 8.6 Require education authorities to recruit and employ specialist EAL/D teachers who meet the revised AITSL Standards, provide incentives for teachers to gain EAL/D specialist qualifications, and report annually on EAL/D teacher numbers, including those with EAL/D qualifications.
- 8.7 Resource an investigation into teacher education provision and pathways for remote Indigenous language speakers, which includes evidence from practitioners in existing and previous programs, and institute one or more pilot programs in appropriate locations.
- 9. OUTCOMES. How will these reforms drive real improvements in student outcomes?**
- 9.1 Including EAL/D learners as a national priority cohort will play a key role in targeting the system barriers that have decimated the EAL/D-informed workforce. See also Policy Questions 1, 4 and 5 (pp. 4, 17 and 20).
- 9.2 EAL/D-specific teacher Standards that are coupled with requirements to train, employ and report on the utilisation of EAL/D specialist and EAL/D-informed teachers will incentivise jurisdictions, school managements, universities and teacher education faculties to rebuild a teacher workforce with expertise to drive improved EAL/D learner outcomes.

RELEVANT ACTA SUBMISSIONS

- For a comprehensive coverage of issues in initial teacher education relating to EAL/D learners, see 2023 ACTA Submission to the Teacher Education Expert Panel Discussion Paper [Advocacy – Australian Council of TESOL Associations](#)
- For a comprehensive coverage of EAL/D teacher supply issues, see section 5 of [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#). See also [ACTA-submission-National-Teacher-Workforce-Action-Plan-final.pdf \(tesol.org.au\)](#)
- Re AITSL Standards, mandatory EAL/D content in ITE, specialist EAL/D qualifications and on-going teacher development, see Actions 5, 6 & 7 in [Roadmap-for-English-as-an-additional-language-or-dialect-in-schools-ACTA-May-2022.pdf \(tesol.org.au\)](#) and sections 2.1 and 2.2 in [ACTA-final-submission-Quality-Initial-Teacher-Education-Review.pdf \(tesol.org.au\)](#)
- For how flexible school-based resource management has decimated the demand for EAL/D teachers, see section 5 of [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#)
- For issues in teacher education for Aboriginal teachers in remote NT schools, see section 5.6 in [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#) and Problem 5 in [ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf \(atesolnt.org.au\)](#)
- Re Teacher Education in the Higher Education Accord, see: [AUA_tranche3_Australian Council of TESOL Associations.pdf \(education.gov.au\)](#)

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- (i) require a **proportionate number of qualified English as a second or additional language (TESOL) educators** to be provided, on an ongoing basis, to the number of enrolled English as an Additional Language or Dialect (EAL/D) learners in schools
 - (ii) undertake an appropriate and consistent EAL/D assessment for EAL/D learners in Australian schools, with the results of the EAL/D assessment, along with **the number of qualified TESOL educators in schools, to be published alongside NAPLAN data** on My School
 - (iii) implement a **replacement to the language background other than English identifier** in the index of community socio-educational advantage that better identifies EAL/D learners for the purposes of school resourcing.”

House of Representatives Standing Committee on Employment, Education and Training (2022). *Don't take it as read*. Inquiry into adult literacy and its importance. Parliament of Australia. Recommendation 8, . 3.208.

³⁶ See ACTA's *EAL/D Standards Elaborations* and AITSL's *Capability Framework for Teaching Aboriginal and Torres Strait Islander EAL/D Learners*.

RESPONSES TO CONSULTATION PAPER QUESTIONS (CHAP. 4)

ACTA submits the following in addition to the answers to Policy Question 2 above.

CP Questions 15, 16 and 17: attracting and retaining teachers

The key to difficulties in attracting and retaining teachers, including teachers with expertise in teaching English as an additional language, lies in how support for *teaching itself* has been progressively undermined across the board.

School autonomy has been accompanied by deterioration of professional development for teachers both at whole-school level and through expert teacher consultants, including EAL/D consultants: see also our answer to CP Question 8 (p. 12) and footnote 28.

The COVID pandemic has brought the lack of support for classroom teaching to crisis point.

The new NSRA must prioritise the value (and therefore time) given to teachers to plan, develop and evaluate their teaching, and to work collaboratively within and across schools. It should authorise a corresponding reduction in assessment and other compliance demands.

A related crucial priority is investing in expert, content-specific, face-to-face and on-line professional development. The NSRA should provide for (and incentivise) increased professional learning in *specific* curriculum areas, including EAL/D learning and teaching, delivered by both jurisdictions and professional associations. Rather than developing more centralised curriculum and assessment resources, the NSRA should resource guidance, support and skills development for teachers at the local level in accessing and evaluating the wealth of what is currently available – something they rarely do, if ever.³⁷ A positive outcome from COVID has been increased access for teachers across Australia to on-line professional learning events. These are especially welcome by those teaching beyond the capital cities.³⁸

The NSRA should also include resourcing that encourages teachers to gain formal qualifications beyond ITE, for example, time release, scholarships and fee waivers. In EAL/D education, this is the main way in which the problems in 7.3 can be redressed.

CP Questions 18 and 19: additional reforms to attract teachers

ACTA's submission to the Teacher Education Expert Panel detailed two substantive and largely untapped sources of teachers, which were not considered in the final report: (i) overseas-qualified teachers, and (ii) Australians returning from overseas.

Re (i): estimates are that a pool of approximately 7,000 migrants and humanitarian entrants with teaching qualifications gained mostly in overseas non-English speaking countries seek but cannot gain entry to teaching in Australian schools.³⁹

Re (ii): many young people, having gained their Bachelor's degree in Australia, travel and often find employment teaching English in countries where the demand is insatiable and being a native English speaker is the only requirement. Many return to Australia highly motivated to gain specialist knowledge and qualifications in teaching EAL/D but no obvious pathways or support exist.

For an elaboration of how these prospective teachers can be recruited, please see section 6 and Recommendations 19, 20 of ACTA's submission to the Teacher Education Expert Panel.⁴⁰

CP Question 20: First Nations teachers

As detailed in numerous ACTA submissions, most recently to the Teacher Education Expert Panel and the Productivity Commission NSRA, the problem in increasing the supply of First Nations teachers and Assistant Teachers in remote Indigenous language speaking communities is *not* "attracting" them but rather that a successful program was cut and replaced by inadequate and inappropriate provision.⁴¹

³⁷ In the words of one teacher (in line with numerous others), "I come home exhausted, feed the kids, and mark students' work. I'm not going to search the internet for resources at 9 o'clock at night."

³⁸ For examples, go to [Events from October 13 – May 24 – VicTESOL](#) and [Professional Learning - ATESOL NT](#)

³⁹ Cruickshank, K., Ellsmore, M. & Brownlee, P. (2018) Skills in Question, SICLE: Sydney University. <https://journals.sagepub.com/doi/abs/10.1177/14749041211048983>. This study found that 80% of volunteer teachers in Community Language schools wanted to become mainstream teachers, including 15% with their first experience of teaching in these schools. 55% were teachers from overseas and 45% had teaching qualifications. In many countries a Bachelor's degree is a sufficient requirement to become a teacher.

⁴⁰ [Advocacy – Australian Council of TESOL Associations](#)

⁴¹ See . 7.7 and footnote 34 above; also and Problem 5 in [ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf \(atesolnt.org.au\)](#). In the NT as the number of qualified First Nations teachers has decreased, principals have

POLICY QUESTION 4: Data Collection

How can data collection best inform decision-making and boost student outcomes?

10. PROBLEM: Current data collection and assessment tools do not inform decision-making that promotes EAL/D learner outcomes.

See also 1.3 above.

- 10.1 EAL/D learners are invisible at the national policy level. Australia has no nationally agreed means of forming a picture of EAL/D learner numbers, reporting on their English language proficiency levels, monitoring provision for them or determining EAL/D learner outcomes.
- 10.2 A lack of policy leadership regarding the EAL/D equity cohort means that – across jurisdictions, sectors and schools – EAL/D learner identification, assessment, data collection and reporting procedures are localised, inconsistent, inadequate and, in some cases, discretionary, inappropriate or not undertaken at all.⁴² See also 13.2 (p. 20).
- 10.3 Teachers, administrative staff and school managers who lack training, expertise or particular concern for ensuring accuracy and comprehensiveness of data can be tasked with identifying EAL/D learners for census and equity loading purposes, assessing and reporting on English proficiency levels, determining learner placement in programs and classes, allocating resources, and monitoring learning.⁴³ See also Policy Question 3 re the loss of EAL/D expertise (p. 14).
- 10.4 The Commonwealth Government has no information on Indigenous EAL/D learners because data from current NSRA and Closing the Gap indicators do not show this: see 1.5 (p. 4).
- 10.5 Data does not appear to exist, at least in the public domain, on outcomes from remote Indigenous student boarding school attendance, including retention/discontinuation, outcomes and after-effects: see also 4.9 above (p. 10).
- 10.6 The ACARA *EAL/D Learning Progression* is currently being reviewed but the short review timeframe is limiting opportunities to adequately consider appropriate EAL/D evidence.

11. SOLUTION: Informed decision making through national data collection on EAL/D learners.

In addition to 2.1, 2.2, 2.3, 2.4 (p. 4) and 5.3 (p.10) above:

- 11.1 Extend the *EAL/D Learning Progression* timeline beyond the Australian Curriculum Review deadline to allow in-depth attention to the EAL/D evidence base, and consultation with practitioners and experts to ensure consideration of (i) EAL/D learning across the curriculum, (ii) EAL/D learners' different entry points to schooling, (iii) EAL/D learning trajectories that differ from English as a mother tongue, (iv) how the revised Progression can align with jurisdictions' EAL/D assessments, and (v) how to avoid the problems described in 1.2, 1.6, 10.2 and 10.3 above (pp. 4 and 17).
- 11.2 Use the National Survey of Aboriginal and Torres Strait Islander Languages as the basis for identifying Indigenous students' English and Indigenous language learning requirements,⁴⁴ including attracting EAL/D funding as per 2.1 and 2.4 above (pp. 4-5).
- 11.3 Invest in EAL/D teacher professional development that ensures knowledgeable and accurate assessment and reporting on the EAL/D proficiency of Indigenous, refugee and migrant-background learners.
- 11.4 Require collection of data and independent evaluations of Indigenous student participation in boarding schools.⁴⁵

prioritised hiring non-Indigenous teachers. The lack of secure well-paid positions for Aboriginal Teacher Assistants does not encourage or support them to seek qualifications.

⁴² Assessment and data collection tools and requirements can vary even in the one State between Catholic dioceses, independent schools and Education Department regions. Across all jurisdictions, moderation sessions in using assessment tools and interpreting results are sporadic and mostly non-existent.

⁴³ Tools that are inappropriate for assessing EAL/ D learners include the ACARA National Literacy Learning Progressions.

⁴⁴ [National Indigenous Languages Report | Office for the Arts](#)

⁴⁵ Evaluations should be cognisant of the linguistic and cultural diversity of First Nations students from remote communities, both those in boarding schools and those excluded from this pathway. See also . 4.1 and footnote 6 above. The focus should include attention to

11.5 Include collection of data on 11.2 & 11.4 in the National Schools Measurement Framework.

12. OUTCOMES: How will these solutions drive real improvements in EAL/D learner outcomes?

12.1 Accurate and comprehensive collection and reporting on EAL/D proficiency levels by EAL/D informed teachers using EAL/D-specific assessment tools will enable resourcing and programs that are directly and effectively targeted to boosting EAL/D learner outcomes.

12.2 A framework along the lines of Appendix B will identify key indicators and data collection points to inform system and school decision-making about the key system processes to boost EAL/D learner outcomes.

12.3 The evidence-base on improving First Nations educational achievements will be strengthened.

RELEVANT ACTA SUBMISSIONS

Re lack of data on EAL/D learners, see Action 10 in [Roadmap-for-English-as-an-additional-language-or-dialect-in-schools-ACTA-May-2022.pdf \(tesol.org.au\)](https://www.tesol.org.au/roadmap-for-english-as-an-additional-language-or-dialect-in-schools-acta-may-2022.pdf)

For lack of data and data collection targets on EAL/D learning in the Closing the Gap Agreement, see [Submission 11 - Australian Council of TESOL Associations \(ACTA\) - Closing the Gap Review - Commissioned study \(pc.gov.au\)](https://www.pc.gov.au/submissions/11-australian-council-of-tesol-associations-acta-closing-the-gap-review-commissioned-study)

RESPONSES TO CONSULTATION PAPER QUESTIONS (CHAP. 5)

ACTA submits the following in addition to the answers to Policy Question 4 above.

ACTA welcomes the Consultation Paper's statement that "the collection and publication of data are critical pillars in holding all governments to account for their collective commitment to improve educational outcomes in Australia" (p. 32). As we have argued above and in numerous other submissions, EAL/D-specific assessment tools are required for reporting EAL/D learner needs, progress and outcomes. Standardised tests such as NAPLAN are inappropriate, especially for students at Beginner and Developing levels (or equivalent).

We also support assessing learners in curriculum areas, conditional on EAL/D-informed teaching and assessments that are interpreted alongside data from EAL/D-specific assessment tools. Learning that happens in classrooms needs greater focus in the NSRA, not standardised tests. See our answers to CP Questions 1, 2, 15, 16 and 17 above (pp. 6-7, 16).

We are disappointed that Chapter 5 does not consider key factors that contribute to the *quality* of data, especially at its collection point. For EAL/D data, this is at the school level. Quality reporting on EAL/D data requires an understanding of EAL/D learning and how to assess it. Our concerns here follow from the loss of EAL/D expertise in Australian schools: see 7.3, 10.2 and 10.3 above (pp.14, 17).

Obtaining quality data on EAL/D learners will require the NSRA to prioritise professional development for practising teachers. In line with our answers to CP Questions 15, 16 and 17 (p.16), the NSRA must require jurisdictions to institute, improve and report on provision for interschool EAL/D assessment moderation on an annual basis.

CP Questions 26 and 27

ACTA believes that gaining nationally consistent data on what we estimate are 600,000 Indigenous, migrant and refugee-background learners of English as an additional language or dialect is indisputably of value at every level of policy-making and provision.

For ourselves, as an advocacy body for these learners and their teachers since the late 1980s, we are deeply concerned about the creation of disadvantage where little or none need exist, due to the continued misdirected and wasteful school programs in which these learners are placed, the consequent undermining of their wellbeing and that of those teaching them, the failure to document their EAL/D learning progress and outcomes, the decimation of Australian expertise in knowledge and skills in EAL/D pedagogy, the lack of transparency and diversion of the SRS English Language Proficiency loading, and the increasing displacement and trivialisation of EAL/D learners' rights to quality schooling by recommendations for "cultural sensitivity", "inclusiveness" and the like (see answer to Question 8, p. 12).

The absence of national data on Indigenous EAL/D learners' languages and EAL/D learning outcomes, and the preoccupation with NAPLAN results in isolation from other data, perpetuate the failures to achieve Closing the Gap outcomes across multiple domains, for example, schooling, further training, employment and incarceration⁴⁶: see statement from NT Courts above (p. 7). We believe that the lack of data on First Nations students in boarding schools is contributing to policy failure in this space: see 10.5 (p. 17).

Further to 10.2 and 10.3 above, the data on EAL/D learners and provision that does exist is, in effect, inaccessible and impossible to interpret because of its sometimes poor quality and overall inconsistency from one jurisdiction to the next. See also 13.3 below (p. 20).

CP Questions 29, 30 and 31: tracking progress and reforms in the next NSRA

We reiterate that data collected using EAL/D-specific assessment tools on EAL/D learning starting points, progress and outcomes should be reported at jurisdictional and national levels, including in the NSRA. It should include longitudinal data.

CP Question 32: an independent body

ACTA supports the creation of an independent body to collect and hold data, conditional on its capacity to correctly identify and interpret data on EAL/D learners and learning. We see this body performing a function similar to the Australian Bureau of Statistics in gaining and providing valid and reliable data for use by governments, policy makers and policy advocates, researchers and others. It would provide openly accessible data on a website in the public domain and other data on request by appropriate bodies and individuals, and would be responsible for meeting privacy and security concerns. The data should be maintained and available separately from the My School website.

⁴⁶ See [Submission 11 - Australian Council of TESOL Associations \(ACTA\) - Closing the Gap Review - Commissioned study \(pc.gov.au\)](#)

POLICY QUESTION 5: System Transparency and Accountability

How can Australian governments ensure that public funding is delivering on national agreements and that all school authorities are transparent and accountable to the community for how funding is invested and for measuring the impacts of this investment?

13. PROBLEM: Systems lack accountability and transparency in their allocation and use of earmarked SRS ELP and State/Territory EAL/D funding to improve EAL/D students' English learning outcomes.

13.1 There is no guarantee that the SRS loading for low English language proficiency (ELP) is used to boost EAL/D learning outcomes, and no consistency or transparency in jurisdictions' or schools' reporting on how this funding is invested, much less its impacts.

13.2 With few exceptions, jurisdictions and schools appear to have little or no commitment to improving accountability, transparency or consistency in reporting on the deployment of tagged SRS and other State and Territory EAL/D funding, or how the requirements of the 2013 Australian Education Act 78 (5) are met.

13.3 The publicly available information on websites and in annual reports etc that is provided by jurisdictions and schools on EAL/D (or even LBOTE) demographics, use of ELP and other EAL/D loadings, EAL/D policies, provision and outcomes is generally difficult to interpret, diffused under multiple headings and in numerous locations or simply absent. It is impossible to interpret this information in any consistent, comparable or comprehensive way across jurisdictions.

13.4 The MySchool website does not accurately report on actual school budget allocations, including use of SRS loadings.⁴⁷

14. SOLUTION: Strengthened transparency and accountability for EAL/D provision

14.1 Require jurisdictions and their schools to report on use of the ELP and other EAL/D loadings that are directly allocated for EAL/D provision in schools, and provide a detailed breakdown on different aspects of use (e.g. staffing, resources, etc.).

14.2 Require education authorities and schools to implement and report on EAL/D program delivery and improvement against quality standards or a program evaluation framework along the lines detailed in Appendix B.

14.3 Tie SRS loadings to provision and reporting on specific programs, as, for example, was the case until 2014 with grants for Indigenous Language Speaking Students.

14.4 Develop recommended Commonwealth protocols for websites and annual reports that will promote transparent, consistent and easily interpretable public reporting by jurisdictions on demographics, provision and outcomes for EAL/D learners.

15. OUTCOMES. How will these solutions drive real improvements in EAL/D learner outcomes?

15.1 Robust reporting on use of the low English language proficiency loading will meet currently disregarded legislative requirements for accountability and transparency.

15.2 Regular reporting on EAL/D program delivery and improvement will ensure system and school level transparency and accountability for developing effective whole school programs that promote EAL/D learner outcomes.

⁴⁷ Regarding the MySchool website, the National School Resourcing Board's Submission to the Productivity Commission's Review of the National School Reform Agreement stated:

The lack of detailed school level information on different areas of expenditure severely limits the usefulness of the data not only for the Board but for any Australian researcher. p. 5.

Its general observations support our answers to Policy Question 12 above:

The simple reality is that there is no consistent transparent information currently provided by Australian governments or by the non-government sector that can be used to assess how school funding is being spent, or even how much funding each school actually receives. In order to gain a proper understanding of how resourcing impacts student outcomes, school systems would need to be required to share the more detailed school-level income and expenditure data that are currently not accessible in a transparent or consistent way. For these reasons, the Board's view is that the lack of detailed school funding data is a major shortfall in the current national evidence base on schooling. (p. 2)

- 15.3 Transparency in the evidence base for Commonwealth and jurisdictional level quality assurance and program planning will be improved.
- 15.4 Identification of key indicators and data collection points enabled by a framework along the lines of Appendix B will strengthen system and school accountability and transparency for the allocation and impact of earmarked SRS funding in improving EAL/D learning outcomes.

RELEVANT ACTA SUBMISSIONS

Re lack of accountability on use of ELP loading, see Action 11 in [Roadmap-for-English-as-an-additional-language-or-dialect-in-schools-ACTA-May-2022.pdf \(tesol.org.au\)](#)

Re lack of transparency and accountability for Gonksi loadings for First Nations students in the NT, see Problem 1 in [ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf \(atesolnt.org.au\)](#) and ACTA [Letter to the Hon Ken Wyatt AM, MP by ATESOL NT and ACTA - ATESOL NT](#)

RESPONSES TO CONSULTATION PAPER QUESTIONS (CHAP. 6)

ACTA submits the following in addition to answers to Policy Questions 4 and 5 above.

CP Questions 36 and 37: better use of information

The protocols recommended in 14.4 above for reporting on SRS ELP and other State and Territory loadings should include:

- 1) Commonwealth SRS loadings allocated to jurisdictions
- 2) State and Territory supplementary resourcing/loadings
- 3) allocations to individual school budgets,
- 4) allocations retained centrally and a break-down of what these are used for.

Details at both jurisdictional and individual school levels should include:

- 5) specific program funding
- 6) employment of designated teachers
- 7) the tools used to collect data and measure progress and outcomes.

APPENDIX A:
Determining the Quality of Provision for
Learners of English as an Additional Language or Dialect in Schools

EVIDENCE-BASED SCHOOL PRACTICES

In 2021, the NSW Department of Education Centre for Education Statistics and Evaluation investigated school practices that correlate with significant and sustained progress by EAL/D learners.

A small number of schools were identified that had demonstrated sustained progress in EAL/D student learning, determined by learners' rates of progress across the four phases in the ACARA *EAL/D Learning Progression* (Beginning, Emerging, Developing, Consolidating). A mixed-methods approach was used to identify common elements in classroom and school practices specifically designed to assist EAL/D learners. The research built on Australian research over the past 20 years, especially descriptions of the specific features of scaffolding for EAL/D learners.

The researchers found that the common element in these schools' practices is strong and strategic school leadership that:

- understands and engages with the diversity of the school community
- fosters respectful relationships and a positive school and classroom culture of cooperation, high care and high achievement
- promotes consistent and sustained teacher knowledge-building
- draws on EAL/D expertise to lead professional learning across the whole school
- encourages teachers to give EAL/D pedagogical strategies and techniques a crucial place in their teaching and learning in all content areas
- promotes EAL/D teaching that features 'high challenge', 'high support' strategies and explicit language and literacy teaching.

INDICATORS OF QUALITY EAL/D PROVISION IN A SCHOOL

The following questions are key to determining the quality of provision for EAL/D learners in a school.

1. How are EAL/D learners identified?
2. What is provided to promote EAL/D-informed teaching?
3. How is language-mediated wellbeing promoted?
4. What information is available and reported to ensure transparency and accountability?

Below is an indicative breakdown of the possible components in each of these questions.

1. How are EAL/D learners identified?

1.1 Are students identified accurately in relation to:

- whether they are Indigenous/migrant background/refugee background/refugees with interrupted schooling/international student
- the language(s) they use in everyday life at home and in the community
- other languages they know and/or use (e.g. learned in prior schooling; used for religious purposes)
- years of prior education.

What are the student numbers currently identified under each of these headings?

1.2 What is used to (i) determine *if* students are learners of English as an additional language or dialect, and (ii) assess and report on learners' proficiency in English as an additional language or dialect?

- EAL/D-specific assessment tools (ACARA EAL/D Learning Progressions; State/Territory EAL/D tools; other)
- other assessments (LBOTE census/NAPLAN data/ assessments based on the ACARA National Literacy Progressions/Australian Curriculum/State literacy or English assessments).

How many EAL/D learners are currently in this school and what are their English proficiency levels?

1.3 Who undertakes English proficiency assessments?

- a qualified EAL teacher
- a teacher with experience of EAL/D learners and teaching
- any teacher
- administrative staff.

1.4 Are students' mother tongue language skills assessed?

- Yes/No.
If yes:
 - how?
 - is the assessment done in the mother tongue?
 - in schools with Indigenous language speakers, is their language proficiency and use identified with reference to the three types of indigenous languages (traditional/emerging/Aboriginal English) as per the [Third National Indigenous Languages Survey | AIATSIS?](#)

1.5 What training, including in-school and inter-school moderation, do teachers in this school get in undertaking assessments of EAL/D learning and learners?

2. What is provided to ensure EAL/D-informed teaching?

2.1 Provision:

- how are classes for EAL/D learners organised in this school?⁴⁸
 - in small groups withdrawn from mainstream classes; if so:
 - from which mainstream classes are learners withdrawn?
 - how often do they attend these classes?
 - what criteria are used to select learners for these classes?
 - in EAL/D classes parallel to mainstream English
 - in mainstream classes with support from EAL/D teachers/Assistant Teachers/teachers' aides
 - in mainstream classes with no extra support.
- what teaching resources for learning English and literacy in English are used with EAL/D learners?

2.2 Teachers

- How many teachers have EAL/D-specific classes in this school (see 2.1)?
- How many teachers with specialist EAL/D qualifications are currently employed in the school?
- How are teachers with specialist EAL/D qualifications deployed in this school?
- Are EAL/D teachers in this school permanent, on short-term contracts, casuals?
- Do these EAL/D teachers work in one school only or across two or more schools?

⁴⁸ Clearly, the answers to these questions must be evaluated in the context of the answers to question 1.

- How many hours a week does/do this/these teacher(s) spend at this school?
- How many non-specialist EAL/D teachers have EAL/D learners in their classes?
 - What are the English proficiency levels of these learners?
- What school-based professional development in EAL/D teaching and learning do teachers in this school get?
 - How often?
 - Who provides it?
- In schools with Indigenous languages speakers, how many speakers of these languages are employed in the school?
 - In what roles?

3 How is language-mediated wellbeing promoted?

3.1 How are students' mother tongues and other languages respected, maintained and developed?

- Are the languages other than English used or known by speakers of these languages taught in the school?
 - If so, how?
- In schools with Indigenous languages speakers, are these languages taught/used in the school?
 - If so, how?
- In schools with mother speakers of Indigenous languages, does the school have a bilingual/biliterate/bicultural program?
 - Yes/No.
 - If yes:
 - at what Year levels are students taught bilingually?
 - for how many hours per day?

3.2 Use of interpreters

- Do any school staff use interpreters?
 - If yes:
 - who uses them?
 - when?
- Do staff receive training in using interpreters?

3.3 Information

- What routine information is sent to parents/care givers from the school?
- What specific information is given to students and their parents/care givers about access to and support for wellbeing if it's needed?
- What language(s) are used?
- Who does translations into languages other than English? Who checks these translations?

3.4 Promoting access to information and support

- What is done to overcome language and/or cultural barriers to accessing wellbeing support?
- What provision is made for parents/care givers who face literacy challenges?
- What does the school do to support students access outside school support for wellbeing?

4 What information is available and reported to ensure transparency and accountability?

4.1 Loadings

- What SRS ELP loading does the school receive?
- What State/Territory EAL/D loadings does the school receive?
- How are these loadings used in the school?

4.2 What data does the school report to jurisdiction authorities on EAL/D learners?

- Numbers and progress according to English Proficiency levels as measured by:
 - an EAL/D-specific assessment tool
 - another assessment tool (name?)
- Numbers and progress according to A – E grades in the mainstream curriculum.

4.3 What data does the school report to jurisdictional authorities on EAL/D provision?

- A breakdown of how ELP and other EAL/D loadings are used.
- Details about provision (see 2.1)
- Details about employment of EAL qualified teachers (see 2.2)
- Details about employment of teachers, Assistant Teachers and teachers' aides who speak the language(s) spoken by students in the school.

4.4 What data does the school report in the public domain?

- In annual reports
- On their website
- Other
- In what languages other than English are these reports?

AUSTRALIAN EDUCATION PERFORMANCE FRAMEWORK FOR EAL/D EDUCATION – key indicators



DETERMINANTS OF EAL/D EDUCATION

What are the sources of linguistic diversity that determine the English language learning needs of the school student population?

- immigration intakes
- school-aged component of immigration intakes
- new arrivals enrolments
- refugee and humanitarian student enrolments
- international student school enrolments
- Regional and remote communities where Indigenous languages, creoles and dialects are the medium of everyday communication
- Indigenous EAL/D learner population
- language diversity of Australian-born students in Kindergarten
- number and proportion of above subgroups in total student enrolments
- length of time of above students in Australian schools
- language children diversity of preschool children

EAL/D EDUCATION SYSTEM

What capacity does the education system have to improve English language learning participation and outcomes of the EAL/D learner cohort? What opportunities for improvement?

TARGETING

System has a valid process for identifying EAL/D learners according to English language proficiency needs

System has a published validated allocative mechanism for targeting EAL/D resources to schools

Public reporting of schools' allocated targeted EAL/D resources and EAL/D program implementation plans

ACCESS

Number, proportion, location and year levels of students identified as having EAL/D learning needs who are receiving and not receiving EAL/D specialist teaching

Number, proportion and location of schools with significant numbers of EAL/D learners who are not receiving EAL/D specialist provision

System syllabus and curriculum resources identify language and literacy demands and supports for EAL/D learners

QUALITY

Teacher regulations recognise EAL/D teaching as a specialism

Systems have EAL/D teacher recognition and appointment processes linked to resource targeting mechanism

Number, proportion and distribution of trained EAL/D teachers allocated to EAL/D teaching positions in schools

Number of EAL/D and mainstream teachers receiving system EAL/D professional development support

Number and proportion of schools using a school EAL/D program standards or evaluation measure for continuous improvement

Periodic system wide evaluation of school EAL/D programs

ACCOUNTABILITY

Transparent system annual reporting of number, proportion and year levels of students identified having EAL/D learning needs

Transparent system annual reporting of targeted EAL/D provision in schools

Transparent system annual reporting of number, proportion and year levels of EAL/D learners receiving EAL/D specialist teaching

Public reporting of system evaluation of school EAL/D programs

EAL/D education included in published

EAL/D EDUCATION STATUS

How well is the EAL/D learner cohort doing in terms of school participation and achievement?

Number, proportion and distribution of EAL/D learners across beginning, emerging, developing and consolidating phases of English learning (over time)

Number, proportion and distribution of EAL/D learners achieving appropriate literacy benchmarks on NAPLAN, relative to time in school

Retention and literacy attainment of EAL/D learners, including Indigenous EAL/D learners, at years 3, 5, 7 and 9.

School completion of EAL/D learner subgroups, including Indigenous EAL/D learners.

EDUCATION SYSTEM CONTEXT

Demography

National and system policies

Resourcing

Teacher regulation

Workforce planning

System data capability

Higher Education Institutions

Information, research and evidence