



**Association of Teachers of English to Speakers of Other Languages
in the ACT**

**SUBMISSION TO
THE ACT GOVERNMENT INQUIRY
INTO
LITERACY & NUMERACY IN ACT PUBLIC SCHOOLS**

February 2024

Table of Contents

1. Introduction	3
1.1 ATESOL ACT – who are we?	3
1.2 The focus of our submission – literacy learning by speakers of languages other than English	3
1.3 The context of this Inquiry	4
2. Why consider learners of English as an additional language or dialect?	7
3. What we don't know, need to know, and need	9
3.1 EAL/D Learner Population in ACT Government Schools	9
3.2 EAL/D Provision in ACT Government Schools	10
3.3 Support for teachers to meet EAL/D learning needs	12
3.4 Implications – Building and Fostering a Quality Teaching Force	14
4. Conclusion	16

1. Introduction

1.1 ATESOL ACT – who are we?

The Association of Teachers of English to Speakers of Other Languages in the ACT (ATESOL ACT) welcomes the opportunity to contribute to the ACT Government’s Literacy and Numeracy Inquiry.

ATESOL ACT members include teachers, consultants, curriculum developers, teacher educators and researchers in the field of teaching English as an Additional Language or Dialect (EAL/D). We provide regular Professional Learning events for those teaching EAL/D learners in the Australian Capital Territory. We advocate for quality educational provision for EAL/D learners in all sectors (Early Childhood Education, schools, adult, community and tertiary education) and for those who teach them in specialist and mainstream classrooms. We are a member of the Australian Council of TESOL Associations (ACTA).

1.2 The focus of our submission – literacy learning by speakers of languages other than English

This submission focuses on speakers of languages other than English in ACT Government schools. This group is highly diverse. As described in the ACARA EAL/D resource:

EAL/D students¹ come from diverse, multilingual backgrounds and may include:

- overseas and Australian-born students whose first language is a language other than English
- Aboriginal and Torres Strait Islander students whose first language is an Indigenous language, including traditional languages, creoles and related varieties, or Aboriginal English.

EAL/D students:

- have diverse educational backgrounds. They may have:
 - o schooling equivalent to their age peers in Australia
 - o limited or no previous education
 - o little or no literacy experience in their first language (or in any language)
 - o excellent literacy skills in their first language (or another language)
 - o learned English as a foreign language and have some exposure to written English, but need to develop oral English.
- already speak one or more languages or dialects other than English. This language knowledge is an advantage when learning an additional language and, along with their life experiences and diverse cultural knowledge, provides learners with resources upon which to build their English language, literacy and educational development
- may have good academic language skills, but struggle with the social registers of English.
- are generally placed in Australian schools at the year level appropriate for their age. Their cognitive development and life experiences may not correlate with their English language proficiency. For example, a student entering Year 8 at an early phase of English language development may already have covered the learning area content for this year level in Mathematics in previous schooling but may not have sufficient English proficiency to understand the teacher's explanation of it or to demonstrate this previously acquired knowledge.²

¹ Where relevant, we prefer the term “EAL/D learner” to “student” because it indicates *a transitional status* in relation to English, rather than an identity that is fixed for the whole of a student’s time in school.

² [Microsoft Word - EALD Overview and Advice revised February 2014 \(acara.edu.au\)](https://www.acara.edu.au), pp. 6-7.

Following from the above, the single-most important point we wish to make in this submission is that **a one-size-fits-all approach to literacy learning is antithetical to serving the educational needs of different equity cohorts, including but not only EAL/D learners.**

As will emerge from what follows, we see the Consultation Paper as misdirected in significant respects. Because we do not accept the premises of many of the Questions, this submission will not address them in order or as framed. However, text boxes will indicate where our discussion has implications for answers to these Questions.

1.3 The context of this Inquiry

ATESOL ACT is pleased to contribute to this Inquiry but we have reservations about its motivation and potential outcomes.

The Inquiry has been instituted in the wake of sustained catastrophising about ACT Government schools' NAPLAN results, including in pieces regularly appearing in the *Canberra Times* Opinion section³ and recently an editorial (Saturday, 17 February, 2024). At the national level, the Grattan Institute has fuelled this discourse of crisis.⁴

We note that literacy crises are heralded in Australia approximately every 10 years.⁵ They should be treated with caution and their various motivations scrutinised.

Promoting the sense of crisis are well-resourced individuals and organisations. Some, such as the Grattan Institute, are committed to advancing their role in policy domains as advocates for the public good. Many others have direct commercial interests in marketing expensive literacy schemes and associated professional development for teachers.⁶

In contrast, professional associations with expertise and experience in language and literacy learning and teaching, including ATESOL ACT, lack the financial and human resources to compete with these well-orchestrated campaigns.

We respectfully request the Expert Panel to give explicit attention in its report to the growing susceptibility of education systems and schools to the aggressive marketing, commercialisation, commodification of literacy learning. Since the 1990s, an increased focus on assessment (and on learning outcomes divorced from learning processes) has generated the anxieties on which this market is trading. Hogan and Lingard (2018) report from a large-scale, open-ended survey of members of the Australian Education Union (2,193 respondents) that:

concerns were expressed about the re-positioning of assessment as the cornerstone of schooling, creating new markets for test-driven products and the associated risk of teacher de-professionalisation when autonomy to decide what and how to teach is diminished.⁷

³ Notably: [Jessica Del Rio | The ACT's poor NAPLAN reading results are a wakeup call | The Canberra Times | Canberra, ACT](#)
⁴ [The Reading Guarantee: How to give every child the best chance of success \(grattan.edu.au\)](#)

⁵ We lack the resources to document this claim but literacy crises go back at least as far as 1991 and Education Minister John Dawkins' Australian Language & Literacy Policy. The most recent crisis before the current one gave rise to the 2021 Parliamentary Inquiry into the Importance of Adult Literacy, which gave considerable attention to school education. [Adult literacy and its importance – Parliament of Australia \(aph.gov.au\)](#)

⁶ For example, [The Science of Language and Reading - An Introduction \(latrobe.edu.au\)](#)
[24 - Jessica Del Rio on solving illiteracy in Australia - Learning with Mr. Lee \(learnwithlee.net\)](#)

⁷ Hogan, A., Lingard, B. (2018). Teachers' perceptions of commercialisation in Australian public schools. Implications for teacher professionalism. Ch. 2, In Netolicky, Deborah M., Andrews, Jon, Paterson, Cameron (eds.) *Flip the System Australia*.

We include this and two other papers on this issue with this submission.⁸

Our response to CP Qs. 2, 5, 11 & 12 is in this & subsequent paragraphs

As in earlier iterations, the current literacy crisis is attributed to so-called “whole language” approaches that prevent children gaining initial literacy. The proposed solution is said to be a structured, explicit focus on phonics according to the “science of reading”.⁹ These diagnoses of the supposed problem and its solution lack transparency in regard to the actual practices they are promoting – and, in the case of the *Canberra Times* and possibly the Grattan Institute, even understanding – for example in statements such as:

The science of reading shows that a structured, synthetic phonic programs is the most effective way to do this [= teach reading].¹⁰

ATESOL ACT and the teachers we represent have consistently endorsed structured teaching. For us “structured teaching” means that teachers work from well-planned and resourced syllabuses and curriculum. Lessons are also carefully planned from both process and outcome perspectives to respond to diverse learning needs and pathways, and include attending to introducing and practising new and unfamiliar English as appropriate to students’ ages and language backgrounds. Of course, this kind of teaching requires teachers to have time to research and plan their lessons, and that they are supported by rich resources and on-going professional development. As already indicated, we believe that a key cause of the decline documented in the Consultation Paper is the increased focus on assessment in Australian education and pressure on teachers to assess and report rather than actually teach.

In regard to Consultation Paper Question 5, we understand from our members that the strength of the approach adopted in the Catholic system in the Goulburn diocese stems from teachers using common terminology and an agreed curriculum to describe what they are teaching and how they are assessing learners. We endorse teacher development that inducts teachers into accurate and shared understandings about how the English language works, and using this knowledge as a basis for curriculum, teaching and both formative and summative assessment and reporting.

However, “structured teaching” in the current discourse of the “science of reading” is likely to refer to use of lesson scripts. These set out fixed teacher elicitations and student responses. Elicitations are repeated until students produce the answer required by the script. We do not endorse scripts that have students parroting pre-determined responses or de-professionalising teachers in this way. We do not endorse expenditure on reading schemes that use this approach.

We endorse teaching sound-symbol relationships that are based on an accurate depiction of English phonology. We do not endorse a narrow focus on decoding, even in the initial stages of learning to read. We endorse promoting an enjoyment of reading, stories, drama, songs and games alongside – and to teach – English sound-symbol relationships, morphology and spelling. We do not endorse teaching decoding to English language learners using nonsense words – which is what “synthetic” normally means. We endorse

What Matters in Education. Routledge. <https://doi.org/10.4324/9780429429620>. (p. 23 in version downloaded from [\(5\) \(PDF\) Teachers’ perceptions of commercialisation in Australian public schools: What Matters in Education \(researchgate.net\)](#))

⁸ Creagh, S., Playsted, S., Hogan, A., Choi, T. Lingard, B (2023). Commercialisation in Australian public education and its implications for the delivery of English as an Additional Language/Dialect: An EAL/D teacher perspective. *TESOL in Context*, 32, 1, 131-159.

Creagh, S, Hogan, A., Lingard, B. and Choi, T. (2022). The ‘everywhere and nowhere’ English language policy in Queensland government schools: a license for commercialisation. *Journal of Education Policy*, DOI: 10.1080/02680939.2022.2037721.

⁹ We see claims for “science” as a signal that should alert the critical reader to bogus fixes. We wonder why promoters of “the science of reading” are not met with the incredulity merited by advertisers of skin products whose efficacy is scientifically proven.

¹⁰ [ACT government urged to address reading instruction crisis | The Canberra Times | Canberra, ACT](#) Saturday February 17, 2024, p. 44.

both “sounding out the word” and using context as appropriate – they are not oppositional pedagogic techniques.

Our point here is that “literacy crisis” discourse is simplistic and misleading in the false dichotomies that contrast proposed approaches with misguided past practices. It is sometimes ideologically motivated and almost always undermines teacher professionalism. It promotes quick fixes aimed to appeal to decision-makers in the political domain, and is liable to benefit commercial interests.

ATESOL ACT rejects the discourse of crisis and these dichotomies. We believe that one-size-fits-all educational diagnoses and solutions merit scepticism.

ATESOL ACT advocates for balanced, more complex and less catastrophic analyses and proposals. Our particular concern is that literacy crisis data are never disaggregated to identify the well over 600,000 young migrant and refugee-background and Aboriginal and Torres Strait Islander students in Australian schools who are at various ages and in various stages of learning English as their additional language (see section 1.2 above).¹¹ For the Grattan Institute, these learners are “beyond the control of the school system,”¹² a statement we deplore. Although the Inquiry’s Consultation Paper is less dismissive, it also relegates these learners to the periphery of educational concerns (see section 2 below).

The “structured, synthetic phonic programs” proposed to solve the literacy crisis assume that students in Australian schools are English monolinguals. The evidence supporting the efficacy of these programs is curated to ignore the vast literature on English language learning and pedagogy, including bilingual/bi-literate approaches, and the needs of EAL/D learners.

More broadly, a focus on “approaches” distracts attention from the fundamental drivers of quality teaching, including in literacy and numeracy, namely the depth of the knowledge and skills that teachers bring to the classroom, and, as professionals, utilise to discover their student’s diverse learning needs and respond appropriately.

ATESOL ACT is conscious of the significant contribution to literacy education by members of the Expert Panel. We are confident that the Panel has the expertise to evaluate the evidence presented to it.

Our scepticism about this Inquiry is directed to its political, commercial and self-promoting drivers. We are afraid that – irrespective of what submissions say and the Panel concludes – the ACT Government will succumb to the formidable forces just described and will mandate an approach to literacy and numeracy in ACT schools, possibly with funding tied to this approach. Our scepticism is supported by the Inquiry’s timeline, which is clearly governed by the need for an “announceable” prior to this year’s ACT elections. Despite an extension, this timeline has made it impossible for the ATESOL ACT Committee to seek out members’ perspectives on literacy learning in ACT schools.¹³ Nevertheless, we hope that the Inquiry might include an opportunity for the Expert Panel to engage directly with the teachers for whom we advocate.

¹¹ This figure is documented in the [ACTA-Submission-to-Productivity-Commission-Review-of-National-School-Reform-Agreement.pdf \(tesol.org.au\)](#), pp. 3-6. It does not take account of the large post-COVID increase in incoming migrants. Creagh, S. (2014). A critical analysis of problems with the LBOTE category on the NAPLaN Test. Australian Educational Researcher. 41: 1-23

¹² [The Reading Guarantee: How to give every child the best chance of success \(grattan.edu.au\)](#), pp. 45, 83, 85.

¹³ Most questions in the Consultation Paper presuppose a level of knowledge and access to data about ACT schools and students that are unrealistic or impossible for most potential respondents to answer, including ATESOL ACT. The answers elicited will be mostly opinions underpinned by indeterminable intentions and motivations.

2. Why consider learners of English as an additional language or dialect?

As just indicated, the Inquiry Consultation Paper assumes a school population that is basically monocultural and monolingual. Students who do not fit these assumptions are identified in section 4. They consist of “dispersed pockets of disadvantage” who are defined socioeconomically,¹⁴ and others in a list comprising “Aboriginal and Torres Strait Islander students, English as an additional language or dialect students, neurodiverse learners, students with learning difficulties and students with disability.”¹⁵ These students are said to require “supports” and “interventions.” The implication is that these students’ learning needs are extra to normal mainstream concerns. The Paper’s other sections are silent on how the issues they canvass might relate to the groups listed in section 4. The silence implies either that these groups fit the supposed norm or that they are peripheral to these concerns.

In contrast, ATESOL ACT’s fundamental premise is that **social, cultural, linguistic and economic diversity should itself be considered the norm in Australian schools, including in the ACT. Diversity should be a mainstream concern. Responding to diversity should be core to every topic addressed by the Inquiry.**

CP Q. 14

ATESOL ACT rejects the assumptions underlying notions of “interventions” and “supports” that the Consultation Paper proposes for EAL/D learners. These proposals position these learners as “disadvantaged.” It condemns them to being disadvantaged by implying that nothing is needed until they are discovered to be “falling behind” and needing “catch-up” support.¹⁶

Fundamental to our position is that disadvantage is *created* for EAL/D learners where it need and should not exist. It is caused by poorly informed school leadership and teachers failing to recognise, respond to and build on the language(s) students speak and to provide appropriate tuition from the moment the learner enters the ACT schooling system.¹⁷

CP Qs. 11,
12, 13, 14 &
20.

An in-principle reason for this Inquiry into literacy to give explicit attention to the diverse EAL/D learner groups listed above in section 1.2 is that assumptions about literacy learning by monolingual English speakers do not apply to these students. They require *pedagogies* that build on and sustain the advantages they already have in their language(s).¹⁸ Ideally, literacy is best learned on the basis of the language(s) they speak. These language(s) should be respected, valued and, where possible, maintained and developed, including literacy that some learners have acquired in their language(s). All EAL learners will need to establish spoken English as the basis for developing English literacy. Specialist EAL/D pedagogies should be taught within a classroom and school ecology that is knowledgeable about and attentive to learners’ previous educational and, where relevant, migration experiences, and their sociocultural background and values.

¹⁴ [2023-ACT-Literacy-and-Numeracy-Education-Expert-Panel-Consultation-Paper-.pdf](#) pp. 11 and 20.

¹⁵ [2023-ACT-Literacy-and-Numeracy-Education-Expert-Panel-Consultation-Paper-.pdf](#) p. 20. The paragraph implies that EAL/D learners are one of the groups “outlined in the Terms of Reference.” In fact, they are not mentioned there (p.6). This inconsistency reinforces the impression that these and the other students listed on p. 20 are peripheral to “mainstream” concerns rather than constitutive of an inherently diverse school population.

¹⁶ [The Reading Guarantee: How to give every child the best chance of success \(grattan.edu.au\)](#), p. 29

¹⁷ It should be noted that this can happen at any Year Level from K – 12.

¹⁸ As summed up in ACARA EAL/D resource:

This language knowledge is an advantage when learning an additional language and, along with their life experiences and diverse cultural knowledge, provides learners with resources upon which to build their English language, literacy and educational development.

[Microsoft Word - EALD Overview and Advice revised February 2014 \(acara.edu.au\)](#) p. 7

When English language learners are taught by qualified, knowledgeable and skilled EAL/D teachers through pedagogies that are based on long-standing research, evidence and good practice, these learners do not require “interventions”. If properly taught from the outset, and if this teaching is appropriately sustained,¹⁹ these learners will excel and thrive as competent, often high-achieving bilinguals.

Not only that – the kind of structured, explicit teaching that promotes advanced proficiency in the English of the curriculum can benefit most students in mainstream classrooms.

The Expert Panel includes members who are entirely familiar with the mountain of research on gaining proficiency in literacy in English as an additional language or dialect. We hope their recommendations deploy this research in recommending on appropriate numbers of qualified specialist EAL/D teachers to meet the needs of students in ACT government schools, the time different types of EAL learners should spend in Intensive English Centres, and on-going, sustained learner access to EAL/D pedagogy taught by specialist EAL/D teachers and EAL/D-informed teachers across the curriculum.

In submission 52 to the Productivity Commission’s 2022 Review of the National Schools Reform Agreement, the Indigenous Education Consultative Meeting (IECM) spoke brilliantly about the deficit assumptions applied to Aboriginal and Torres Strait Islander students. What they said applies with particular force to Aboriginal and Torres Strait Islander students but is equally true for *all* learners of English as an additional language or dialect, be they Indigenous, refugee- or migrant-background:

We wholeheartedly reject language of ‘disadvantage’ in reference to Aboriginal and Torres Strait Islander education. This labelling of Aboriginal and Torres Strait Islander students and families as disadvantaged continues to play into a culture of deficit discourse and low expectations that stymie Aboriginal and Torres Strait Islander students’ ability to thrive in their education. Our students are not the problem – the system is failing them. While Aboriginal and Torres Strait Islander students and communities face a range of complex and compounding circumstances that impact their educational engagement and outcomes, they are not inherently disadvantaged by being Indigenous. We commend the strength of Aboriginal and Torres Strait Islander students knowing their culture, language and identity. The power of being able to walk strong in two worlds.²⁰

Our first recommendation is therefore as follows.

¹⁹ Collier, V. (1987). Age and rate of acquisition of second language for academic purposes. *TESOL Quarterly*, 21:4, 617-641.
Creagh, S., Kettle, M., Alford, J., Comber, B., and P. Shield. (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

Creagh, S. ((2023). Measuring the academic progress of newly arrived Migrant and Refugee youth: An Australian school-based longitudinal study. in *The Research Handbook on Migration and Education*. Edward Elgar., 157-172;
<https://doi.org/10.4337/9781839106361.00017>

²⁰ Submission 52 - Indigenous Education Consultative Meeting (IECM) - National School Reform Agreement - Commissioned study (pc.gov.au) p. 3.

RECOMMENDATION 1

That the Expert Panel’s consideration of literacy and numeracy learning in ACT Government schools:

- (i) takes as its starting point that a diversity of learner needs and aspirations is *constitutive of schooling in Australia, including the ACT, and that*
- (ii) *eschews one-size-fits-all “approaches” and “interventions”, but rather*
- (iii) **prioritises the development of teachers and school leaders in the ACT who are knowledgeable about and skilful in building on this diversity, and who are supported to deepen their knowledge and skills by:**
 - a. **resourcing of quality programs and staffing to meet diverse learning needs, and**
 - b. **employment pathways that encourage formal and informal professional development.**

3. What we don’t know, need to know, and need

3.1 EAL/D Learner Population in ACT Government Schools

The trends in NAPLAN data that have prompted this Inquiry are not disaggregated for EAL/D learners. In the monolingual deficit terms of the Consultation Paper, these students are simply one group in a list of those “not meeting proficiency expectations”.²¹

This silence reflects the lack of data in the public domain (as far as ATESOL ACT can determine) on:

1. the number of students in ACT government schools who are assessed for English language proficiency²²
2. a breakdown of these students according to the four proficiency levels (Beginning, Emerging, Developing, Consolidating) in the ACARA EAL/D Learning Progression,²³ which is the tool used to assess English proficiency in ACT government schools
3. data on these students in relation to:
 - a. their age
 - b. Year Level in ACT schools
 - c. previous educational background
 - d. years in Australia if migrant-background
 - e. the schools in which these students are located.
4. further data on Aboriginal and Torres Strait Islanders and Pacifica students in ACT government schools disaggregated to show:
 - a. speakers of languages and dialects other than Standard Australian English **vis à vis:**

²¹ [2023-ACT-Literacy-and-Numeracy-Education-Expert-Panel-Consultation-Paper-.pdf](#) p. 8

²² These data are collected by the Education Directorate but we cannot find where they are reported.

²³ [Microsoft Word - EALD Learning Progression July 2015 \(acara.edu.au\)](#)

- b. performance on NAPLAN tests and other literacy assessments
- c. provision of Indigenous language maintenance and revival programs
- d. provision of tuition that is dialect-informed.²⁴

Without the above data, CP Qs 6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 18, 19 and 20 cannot be answered accurately.

The absence of publicly available data on EAL/D learners and provision in the ACT conveniently leaves advocacy for EAL/D need and provision in an evidential vacuum. It reflects and sustains the Paper’s depiction of a homogeneous school population that is disrupted on the margins by groups who do not fit the norm.

It also authorises the Inquiry’s search for one-size-fits-all approaches. Without data what underpins the failure to meet “proficiency expectations” – in this case, the diversity of EAL/D learning needs and what should be provided to meet them – “interventions” and “supports” based on monolingual English assumptions are legitimised. These interventions are routinely misdirected, counter-productive and confusing. EAL/D learners are subjected to “interventions” that treat them as if they have hearing and/or cognitive deficits. Literacy is taught and assessed without attention to the need for learners to develop spoken English. Decoding is taught in ways that assume that learners already know what they need to learn (e.g., the English sound system) and don’t know what they do know (e.g., for those with previous schooling, how to read and write in another language).²⁵

3.2 EAL/D Provision in ACT Government Schools

The paucity of information on provision for English language learners in ACT government schools follows from the data vacuum on this population. Information is not available (at least in the public domain) about:

1. schools with designated EAL/D teaching positions, specifically:
 - a. the number and location of these schools
 - b. the number of students at the different ACARA EAL/D Progression levels in these schools
 - c. the number of full-time equivalent teachers in designated EAL/D teaching positions in these schools.
2. schools with students at the different ACARA EAL/D Progression levels but no designated EAL/D teaching positions.
3. schools with designated EAL/D positions whose teachers:
 - a. hold specialist TESOL qualifications
 - b. do not hold specialist TESOL qualifications.
4. EAL/D tuition provided for students according to:
 - a. their ACARA EAL/D Progression levels
 - b. type and hours of EAL/D tuition (e.g. Intensive English Centre provision; timetabled & parallel EAL-specific classes in schools; small group EAL withdrawal classes; EAL/D support in mainstream classes; teaching by mainstream EAL/D- aware teachers)
5. the number of TESOL-qualified teachers in ACT schools who are *not* in EAL/D designated positions

²⁴ Angelo, D and Hudson, C. (2018). *Dangerous Conversations: Teacher-Student Interactions with Unidentified English Language Learners*. In Wigglesworth, G and Simpson, J. (eds.). *Language Practices of Indigenous Children and Youth*. Palgrave Studies in Minority Languages and Communities.

²⁵ For example, confusion can reign when a literacy teacher diagnoses and treats a learner as hearing impaired when the learner’s language does not distinguish between /p/ as in *pig* and /b/ as in *big* and, conversely, makes phonemic distinctions that show up in spelling that the teacher cannot hear.

6. requirements for schools and the Directorate to report any of the above in the public domain, to Parliament or internally.

We have been told anecdotally (and have no means of verifying this) that the Directorate does not exercise its authority to collect these data.

The following comment is from an experienced EAL/D teacher who responded to a request to the ATESOL ACT mailing list for input to assist this submission.²⁶

CP Q. 19.

Q 19: What are the best approaches to evaluation and monitoring of schools to ensure appropriate support and accountability in relation to literacy and numeracy outcomes?

- **Ensure accountability for use of EAL/D funding.**
- **Ensuring EAL/D support is in line with recommendations in the EAL/D Procedures.**
- **An audit of EAL/D Needs Based Funding would confirm if children who receive funding actually receive targeted Specialist EAL/D support.**

The Consultation Paper points out that the ACT “is the only jurisdiction to fund its public education system to the Schooling Resource Standard”. It fails to mention that data is not available in the public domain that allows scrutiny of how needs-based funding is directed, much less the learning outcomes achieved in specific domains.

Relying on anecdotal accounts and our members’ experience, we believe that the following characterises EAL/D provision in ACT government schools. EAL/D designated teachers commonly have no TESOL qualifications. They are generally employed as casuals or on short term contracts. They often work as itinerants on different days and hours in one or more schools. They are almost always the sole EAL/D teacher in the school(s) in which they are employed.²⁷ They are frequently used as relief teachers in their school(s). EAL/D designated roles are often not teaching but administrative (e.g. managing international students, providing census data, assessing students against the ACARA EAL/D Learning Progression). While advocacy on behalf of EAL/D learners is supposedly included in EAL/D teachers’ duties, this is impossible given the conditions under which they work. There are no promotion pathways that recognise EAL/D expertise.

The Consultation Paper asks:

Q 9. What is the most effective way for schools to communicate student learning progress to students and their families to ensure a shared understanding of outcomes in relation to literacy and numeracy? Are there any effective approaches that are efficient and minimise impacts on teacher workload?

Our answer is in Recommendation 2.

²⁶ Bolding and underlining are in the original.

²⁷ One of our Committee members is employed as the sole EAL teacher in a secondary school of approximately 600 students. Her teaching load includes teaching a language other than English and mainstream English.

RECOMMENDATION 2

The Education Directorate should create a standardised template for schools' annual reports that is transparent regarding use of the Schooling Resource Standard, needs-based loadings and further resourcing by the ACT Government.

Data from these reports should be collated by the Directorate in a detailed annual report to Parliament and summarised in a clearly accessible, standardised form on the Directorate's publicly accessible website.

The website should also include the data sets listed in sections 3.1 and 3.2 above.

3.3 Support for teachers to meet EAL/D learning needs

This section is our response to CP Qs. 16 & 17.

The ACT Education Directorate operates as a "closed shop" behind a password protected digital wall. No information is publicly available on:

1. the number and type of professional development sessions by the Education Directorate on EAL/D learning needs and pedagogies offered to:
 - a. EAL/D designated teachers
 - b. other teachers with EAL/D learners in their classes
 - c. school leadership.
2. the amount and type of support for teachers to gain TESOL qualifications (e.g. scholarships, time release, promotion opportunities).

In the absence of information on support for teacher development that is directly accessible to ATESOL ACT, we cite comments verbatim from the experienced EAL/D teacher above, most of which relate to professional development.

Q 6: How can school leaders and the Education Directorate be confident or what is being taught and the effectiveness of how it is being taught?

COMMENT:

The effectiveness of teaching is a concern for EAL/D students because they are learning English, learning *about* English and learning *in* English at the same time. This increases the cognitive load for these students who do not always have their point of need addressed/understood:

- There is a lack of teacher understanding of how to assess needs and then differentiate for EAL/D language learning.
- The number of EAL/D students in ACT continues to grow but the fact that EAL/D is now a mainstream concern is not receiving enough attention through PL opportunities for mainstream teachers.
- Many teachers have inconsistent understanding of traditional and functional grammar terms that are in the Australian Curriculum and this aspect of English, essential for EAL/D, is not always taught effectively. While some teachers are very skilled, they are not in the majority. This lack of consistency in teaching curriculum grammar across ACT schools impacts on all children's literacy learning.

- **Many educators do not understand the difference between it taking 1-2 years to develop oral proficiency but 5-7 years for academic proficiency. This extends through to executive and leadership.**

Q7: What approaches to assessment and screening would provide the most useful data to support educators and school leaders in understanding student progress, identifying need and ensuring consistent improvement in literacy and numeracy outcomes?

COMMENT:

- EAL/D teachers have access to whole-system assessment material and are competent in identifying EAL/D status and English language needs.
- EAL/D data should be studied alongside other school data to inform instruction.
- There is a need for school leadership teams to be able to interrogate EAL/D data effectively and to note improvement in language growth that may not yet be reflected in other literacy data.
- **There is a need for more consistent use of EAL/D Guides that both assess EAL/D student literacy performance and indicate next teaching steps.**

Q11: What evidence based supports and interventions are most effective for supporting students who have not yet reached expected proficiency in literacy and numeracy? Are there any particular supports that are more effective for students from specific equity cohorts. (e.g. EALD, Aboriginal and Torres Strait Islander Students)?

- **For EAL/D students, proficiency should be considered with the understanding that it can take 5-7 years for a student to achieve academic proficiency.**
- Literacy and numeracy planning needs to have the language demands that underpin activities identified to enable and inform appropriate support.
- Particular supports that are effective include explicit and consistent English language teaching by skilled specialist teachers.
- More EAL/D specialist teachers are needed so there is at least one in every school and in line with EAL/D needs-based funding allocation.
- Upskilling of mainstream teachers is urgently required.
- Teacher PL in how to teach curriculum grammar within appropriate contexts - not as stand-alone lessons. This includes explicit instruction on how to construct a range of text types, and an understanding of text cohesion which impacts EAL/D reading comprehension and writing clarity.

Q 15: What system-wide and school based professional learning and coaching best support educators with literacy and numeracy instruction and improvement? Are there any that best support early career teachers as they commence, or middle leaders with literacy and numeracy instructional leadership?

- There is a misunderstanding that more ‘literacy’ teaching is needed for EAL/D, when explicit *language* support and teaching is required. School based professional learning should focus on how to unpack and address curriculum language demands.
- **The EAL/D team in the Directorate have excellent EAL/D PL programs available to upskill all teachers.**

- Teacher education in general needs to be examined to ascertain there is balance between theory and practice. The link between theory and practice is observation (of students, not data).

The ATESOL ACT Committee sees our main role as providing professional learning events for teachers.²⁸ Participation is boosted if these events are TQI accredited. Our institutional membership offers schools members' rates (half price) at events for two teachers. So far this year (2024), this has been taken up by one government primary and one Catholic school, which is discouraging and reflects the picture painted above.²⁹

Our Committee members have cordial relations with the Education Directorate EAL/D team. We meet occasionally where we inform them about our activities. We would welcome the opportunity to co-ordinate or complement each other in planning professional learning events but this seems off the table. Our advocacy is politely noted.

Unlike our sister TESOL associations in Victoria and the Northern Territory (and possibly other states), ATESOL ACT receives no financial support. We work entirely as volunteers.

Overall, it is our impression that the Directorate's stance towards us is defensive and that substantive collaboration, co-operation, support or even a genuine exchange of ideas are impossible. The prime concern of senior management appears to us to be control of lower order staff and teachers, and maintaining and policing its closed shop.³⁰ We are not included as stakeholders in ACT Education policy discussions or curriculum development as it impacts on EAL/D learners and their teachers. The Education Minister appears to us to have no interest in EAL/D learners or their teachers.³¹ Conversation with other professional associations for teachers in the ACT suggest that our impression is shared.

3.4 Implications – Building and Fostering a Quality Teaching Force

The data vacuum on EAL/D learners and how their needs is part of the bigger picture exemplified in the Consultation Paper. The preoccupation with “approaches”, “supports” and “interventions” deflects attention from the ACT Education Directorate's responsibility to address the fundamental driver of a quality education system, namely the teachers it employs, the work they do, and the conditions that support their work, including employment security.

It appears to ATESOL ACT that the Directorate has no interest in building EAL/D expertise in the teaching force. For example, in 2022, we invited the Directorate to participate in a professional learning event entitled “So you'd like to teach English language learners?”. Our aim was to provide information to prospective teachers on pathways into EAL/D teaching. Several phone calls and emails later, the Directorate declined this invitation on the grounds that such aspirations are irrelevant to their recruitment procedures.

The Directorate's lack of interest in employing specialist TESOL teachers has had catastrophic effects on the supply of these teachers. The University of Canberra (UC) advertises itself as offering TESOL qualifications that will equip prospective teachers and upskill practising teachers to teach EAL/D learners

²⁸ See our website for events planned for 2024: [ATESOL ACT | Association of Teachers of English to Speakers of Other Languages in the Australian Capital Territory](#)

²⁹ Last year, we had 4 institutional members. Total membership in all categories for 2024 so far is 50.

³⁰ Several years ago, ATESOL ACT held an open forum on EAL provision to which politicians from all sides of politics and senior officials were invited. The night before the forum ACT government teachers received emails from the Directorate reminding them of their statutory obligations.

³¹ For example, letters to her have been passed down the line, where the response is a polite phone call expressing gratitude but nothing else.

in Australian schools.³² In reality, the TESOL program is clearly directed to the lucrative international market for TESOL qualifications. Course content is highly generic and, last we had sight of it, silent on resources (and their underlying principles) that are central to EAL/D teaching in the ACT, notably, the Australian Curriculum, the ACARA Learning Progression, the ACARA EAL/D Resource and other Australian curriculum and assessment resources. When this issue was raised in UC Course Advisory meetings in the past, the response was that there is “no demand” for Australian content and that it holds no interest for international students. To our knowledge, the Directorate has no representation in these meetings.

We suggest that the Panel seek information regarding UC’s TESOL offerings and develop recommendations specifically regarding:

- core content on EAL/D pedagogy for all students in pre-service programs
- a TESOL method/specialism option in the pre-service program
- Australian-oriented content in the specialist TESOL program
- opportunities and requirements in the pre-service Education and specialist TESOL program for students to undertake EAL/D teaching practica in schools
- the length and quality of EAL/D-related supervision in both the pre-service and specialist TESOL program.

Clearly, universities, including UC, cannot and will not offer Australian-oriented TESOL programs and core units in undergraduate programs if there is no employer demand. The power to determine the type and quality of UC teaching qualifications lies squarely with the ACT Education Directorate and its employment requirements.

Rather than seeking to end the vicious circle in which the Directorate’s lack of demand for EAL/D expertise leads to a lack of supply, the Directorate seems to us to consider that its in-house professional learning sessions are sufficient to support EAL/D teaching. However, reliance on *ad hoc* professional development sessions – no matter how excellent – reflects its closed shop culture. It allows the Directorate’s commitment to teacher quality to escape scrutiny, supports its control over teachers and avoids accountability for, among other things, the use of needs-based loadings.

The Consultation Paper is correct in stating that school autonomy “presents challenges in terms of how ACT public schools operate as a system” (p. 11). However, the core issue in lifting literacy and numeracy outcomes is not the question of whether “teaching approaches” should be mandated (Consultation Question 4). Rather, the fundamental driver is the staffing decisions made by school principals. Without direction, support and incentives from the Directorate (notably, regarding use of the English Proficiency loading), it is difficult for principals to change the staffing status quo in their school and/or resist powerful constituencies and the loudest voices, including those identified in section 1.3 above. Like their teachers, EAL/D learners and their parents/carers cannot exert this kind of pressure. Hence their needs and aspirations continue to be marginalised as “non-mainstream” as in the list in section 4 of the Consultation Paper.

This Paper gives every indication that the Directorate will meet the challenge of school autonomy by the easy route of mandating a pedagogic approach to literacy (and numeracy). Schools will be required, and maybe partly supported, to purchase expensive literacy packages that claim to meet all learning needs.³³

³² See: [Teaching English to Speakers of Other Languages and Foreign Language Teaching - University of Canberra](#). It seems to us that the claims made on this website regarding TESOL offerings, and the absence of relevant information, come close to misleading.

³³ See Consultation Paper Questions 4 and 5, p 27.

The overwhelming evidence that the level, type and quality of teacher qualifications are decisive in achieving educational outcomes would appear to have no place in the Directorate's thinking.

4. Conclusion

In recommending improvements to literacy and numeracy education in the ACT, the Expert Panel should direct its attention to the policies and procedures that are currently holding back the development of a more skilled and knowledgeable teaching force in this jurisdiction.

Our final recommendations, which is also our partial answer to Consultation Question 1, are as follows.

RECOMMENDATION 3

The Expert Panel's recommendations should focus on:

- staffing ACT government schools with teachers whose initial qualifications have provided them with the knowledge and skills required to teach literacy to both mother tongue English speakers and English language learners
- leveraging the University of Canberra to provide:
 - substantive core units on EAL/D pedagogy initial qualifications
 - options for substantive EAL/D content that relates to the Australian context within the specialist TESOL program
- incentivising prospective teachers with these qualifications from other universities to teach in ACT government schools
- ensuring that, commensurate with data on EAL/D learning levels and needs, teachers with specialist qualifications in teaching speakers of English as an additional language or dialect are employed in ACT schools¹
- equipping school principals with the knowledge, authority and resources to employ and support specialist EAL/D teachers and other EAL/D-informed teachers
- instituting accountability requirements that require detailed reporting on use of the English Proficiency loading in relation to teacher employment, EAL/D-specific programming and EAL/D learner proficiency on the ACARA EAL/D Learning Progression
- providing transparent and consistent reporting on EAL/D learners and provision in the public domain, including the ACT Parliament and the Directorate's public website
- providing teachers with rich pedagogic resources and on-going informal and formal professional development, including in assessing EAL/D learning needs and evaluating and adapting different approaches to meet these needs
- using teachers designated as EALD teachers to (i) actually *teach* these learners and (ii) promote EALD-informed teaching across the whole school
- remedying the structures and procedures that are currently preventing teachers from utilising their pedagogic knowledge and skills in their classrooms
- improving collaboration with and support for professional associations for teachers in the ACT, including but not only ATESOL ACT, and treating them as genuine stakeholders in regard to curriculum and provision in their particular professional domain.

ATESOL ACT is pleased to have had the opportunity to make this submission. We hope the Expert Panel finds it useful. We would welcome further opportunities to support the Panel's work.