



Australian Council of TESOL Associations

Submission

on

First Nations Education Policy

24/02/2026

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Abbreviations and acronyms

ACARA	Australian Curriculum, Assessment and Reporting Authority
ACT	Australian Capital Territory
ACTA	Australian Council of TESOL Associations
AGDE	Australian Government Department of Education
AITSL	Australian Institute for Teaching and School Leadership
ANAO	Australian National Audit Office
AERO	Australian Education Research Organisation
ASQA	Australian Skills Quality Authority
EAL	English as an additional language
EAL/D	English as an additional language or dialect
ESL	English as a second language
FLA	First Languages Australia
IECM	Indigenous Education Consultative Meeting
ITE	Initial teacher education
LBOTE	Language background other than English
LEP	Low-English proficiency (loading)
LPC	Literacy Production Centre
MCEETYA	Ministerial Council on Education, Employment, Training and Youth Affairs
NAPLAN	National Assessment Program – Literacy and Numeracy
NCVER	National Centre for Vocational Education Research
NSW	New South Wales
NT	Northern Territory
RATE	Remote Aboriginal Teacher Education
RPL	Recognition of prior learning
SAE	Standard Australian English
SNB	Student needs-based (funding)
SRS	Schooling Resource Standard
SRM	School Resourcing Model
TAFE	Technical and Further Education
TESOL	Teaching English to Speakers of Other Languages
UK	United Kingdom
VET	Vocational education and training

Recommendations

1. Development of the Policy should include:
 - an in-depth review of the Winhangarra project: its contribution and achievements, progress in implementing its recommendations and utilising its resources, and
 - a "next steps" plan of action.

LANGUAGE: KEY CONCEPTS AND TERMINOLOGY

2. Systematic attention should be given to the role of First Nations languages and Standard Australian English in all dimensions and focus areas of the Policy.
3. The Policy should use authoritative and recognised terminology in its references to languages, language use and the role of languages in the education of First Nations students.
4. The Policy should be directed to strengthening and extending English language learners' linguistic repertoires, building and leveraging their proficiency in all their languages, and working to foster the richness of Australian language ecologies.

FOCUS AREA 1: CURRICULUM AND TEACHING – TEACHER PREPARATION AND PROFESSIONAL DEVELOPMENT

First Nations Educators

5. The Policy should prioritise support for the culturally and linguistically appropriate training, recruitment and on-going professional development of Indigenous teachers, Assistant Teachers and other education workers, both on-site locally in schools and in more formal campus situations.
6. This support should include support to jurisdictions in planning, resourcing, improving, upgrading and evaluating one or more purpose-designed Remote Aboriginal Teacher Education programs that build on the experience of the Northern Territory RATE trial. These programs should:
 - contain appropriate content for experienced Assistant Teachers in remote schools, which respects and builds on their knowledge as speakers of Aboriginal languages and their status as cultural custodians in their communities
 - offer qualifications at levels that are directly tied to jurisdictions' salary scales
 - ensure adequate support for enrolled Assistant Teachers to develop their academic English skills
 - be delivered by teacher educators who are employed onsite in the remote schools participating in the program and who are qualified, experienced and competent in EAL/D and bilingual pedagogy in remote contexts
 - be progressively extended to other communities with relatively large populations, designated as "hubs" for more comprehensive coverage
 - include the following stakeholders in developing and accrediting the Program(s): employing authorities; training providers (e.g. Charles Darwin University and Batchelor Institute); accreditation authorities (AITSL, ASQA, and State/Territory Teachers Registration Boards).
7. The Policy should include provision for requiring jurisdictions to maintain and publish an annual record of the total number of Aboriginal and Torres Strait Islander Teachers and Assistant Teachers employed in their schools.
8. The Policy should be based on an in-depth analysis and review of work by First Languages Australia, including Yalbilinya: National First Languages Education Workforce Strategy.

EAL/D-Informed Teachers

9. To ensure all teachers have the necessary knowledge and skills for effectively teaching EAL/D learners, all Initial Teacher Education (ITE) candidates should be required to complete at least one mandatory unit on EAL/D teaching and learning in their initial teacher education program.
10. AITSL's Australian Professional Teaching Standards should encompass supplementary standards frameworks for teaching EAL/D learners, drawing on ACTA's *EAL/D Standards Elaborations* and AITSL's *Capability Framework for Teaching Aboriginal and Torres Strait Islander EAL/D Learners*. ITE core content should draw from the multi-disciplinary knowledge that underpins teacher education, curriculum and pedagogy, and recognise this knowledge as informing core content for ITE.

EAL/D Specialist Teachers

11. The Policy should explicitly recognise EAL/D specialist teachers as essential to achieving equitable educational outcomes for First Nations learners who speak traditional Indigenous languages, new or emerging languages, and Indigenous Englishes.
12. The Policy should recommend the reinstatement and expansion of specialist pre-service and postgraduate qualifications in EAL/D, including coursework that explicitly addresses First Nations languages, multilingualism, bilingual education and Indigenous Englishes.
13. The Policy should require that AITSL accreditation standards and professional frameworks explicitly recognise EAL/D specialist expertise, including advanced knowledge of language, linguistics and multilingual pedagogy, as a valued and necessary component of teacher professionalism.
14. The Policy should mandate the collection and public reporting of data on the provision of EAL/D specialist teachers across jurisdictions, including qualifications held, deployment models and access for First Nations learners.

EAL/D Area Consultants for Schools

15. The Policy should explicitly recognise the need for area-based consultants as essential system-level support for First Nations speakers of traditional Indigenous languages, new or emerging languages, and Indigenous Englishes, including English language learners.
16. The Policy should provide clear guidance on defining language consultant roles that combine expertise in supporting First Nations languages and English language learning; these roles should not be subsumed within mother-tongue English literacy, cultural inclusion, wellbeing or equity functions where language and linguistics knowledge is incidental, optional or absent.
17. The Policy should recommend the reinstatement and adequate resourcing of designated language consultant positions, with manageable workloads that enable sustained, context-specific support to schools, particularly in remote, regional and high-need contexts.
18. The Policy should recommend that the Schooling Resource Standard (SRS) Aboriginal and Torres Strait Islander student loading explicitly recognise English language learning needs. Alternatively, the low-English proficiency (LEP) loading should include First Nations English language learners.

Post-School Pathways into teaching and other employment/professions

19. The Policy should explicitly recognise English language learning as a core access, participation and student success issue within VET and higher education pathways for First Nations learners.
20. The Policy should support cross-portfolio collaboration with post-school systems to ensure that English language learning needs are visible within post-school reform agendas, including through guidance, funding levers and capability-building initiatives that encourage providers to embed course-specific English language and academic literacy support aligned to vocational competencies and disciplinary assessment practices.
21. The Policy should support targeted professional development for lecturers, trainers and assessors to build capability in teaching and assessing First Nations EAL/D learners within reformed VET and higher education frameworks.

22. The Policy should promote informed transition and learner support models that include EAL/D knowledgeable Study Skills staff and pathway advisors, ensuring First Nations learners can successfully enter, navigate and complete post-school pathways.

FOCUS AREA 1 (CONT.) CURRICULUM AND TEACHING – PROGRAMS

Bilingual Two-Way Programs

23 The Policy must:

- recognise the educational needs of communities where English functions as a second or foreign language and require instructional models that provide first-language-medium teaching alongside explicit English as an Additional Language or Dialect (EAL/D) instruction, rather than assuming English as the default medium of learning
- specify bilingual and two-way programs as a normal mode of provision in Indigenous language-speaking contexts, rather than as discretionary, supplementary or transitional initiatives
- provide stable, recurrent and protected funding for bilingual and two-way programs, ensuring that allocated funding cannot be diverted, diluted or discontinued through local administrative decisions without community agreement
- require staffing models for bilingual and two-way programs to include both:
 - i. First Nations teachers who are speakers of the local language, and
 - ii. teachers with recognised specialist training in EAL/D and bilingual pedagogy, with clearly defined and complementary roles in curriculum delivery.
- ensure continuity and sustainability of bilingual provision by requiring jurisdictions to plan for staffing succession, professional learning and program continuity when personnel change, rather than allowing programs to collapse due to workforce turnover
- support nationally recognised training, employment and career pathways for both First Nations language teachers and EAL/D specialist teachers
- embed safeguards for community authority so that decisions about the establishment, continuation or modification of bilingual and two-way programs are made with, and not merely for, the relevant First Nations communities.

Translanguaging

24 The Policy should:

- align translanguaging with other commitments to sustaining Indigenous languages and supporting learners to extend their linguistic repertoires in all domains
- provide professional learning for teachers in schools and VET settings to develop the linguistic and pedagogical knowledge required to use translanguaging strategically, avoiding deficit framings of multilingual learners and strengthening continuity between home and school language practices
- promote the use of translanguaging in contexts where bilingual provision is constrained by high levels of linguistic diversity, limited staffing or the absence of a single dominant community language, as a means of enabling curriculum access without denying or marginalising students' home languages
- outline best practice in implementing translanguaging practices deliberately and systematically, informed by knowledge of and respect for students' language repertoires.

Current Approaches to Teaching Basic Literacy and Phonics

25 The Policy should recommend that it be standard, routine practice for jurisdictions to provide and update teachers with:

- accurate advice on the nature of phonemic systems in general and, wherever possible, relevant features of the phonological systems of the First Nations EAL/D learners they currently teach

- face-to-face professional development in: understanding these resources; how to investigate why a First Nations student is challenged in interpreting and producing particular English phonemes, and distinguishing between them; appropriate and enjoyable listening activities in distinguishing English phonemes in meaningful contexts; and strategies for teaching English pronunciation, stress, rhythm and intonation.
- 26 The Policy should require Commonwealth funding that supports phonics teaching and assessment, including the Australian Literacy and Numeracy Hub, to:
- explicitly recognise First Nations languages (traditional languages, Kriols and emerging languages, and Aboriginal Englishes) as systematic linguistic systems
 - include explicit and differentiated guidance on First Nations learner profiles and linguistic ecologies as they relate to the implications for English literacy learning
 - include resources for teachers with First Nations speakers of traditional Aboriginal languages, Kriols and Aboriginal Englishes, including guidance in teaching basic literacy.
- 27 The Policy should specify that First Nations EAL/D learners who are assessed as in the Beginning, Emerging and Developing Phases on the ACARA English as an Additional Language/Dialect (EAL/D) Learning Progression (or other State assessments used for EAL learners) should not be assessed against Phonics Checks based on synthetic phonics principles. Their reading proficiency should be documented against EAL/D-specific assessment tools.
- 28 The Policy should state that the use of pseudo-words and decodable texts has no place in teaching reading to First Nations students, irrespective of the languages they speak, including English. It should strongly recommend that the explicit, systematic teaching of grapheme/phoneme relationships to First Nations students occurs in the context of multiple exposure and practice opportunities in oral English and the English sound system, vocabulary development and Standard Australian English grammatical structures, spoken and written genres, and pragmatic and sociocultural knowledge and skills. Reading material should be selected in line with the learner's overall proficiency in English on a recognised proficiency measure.

NAPLAN

- 29 The Policy should recommend the development of a nationally consistent measure of English language learners' proficiency, including First Nations learners, as a matter of urgency, and that it be used to inform interpretations of NAPLAN results and guide EAL/D provision.
- 30 The Policy should include explicit recognition that well-established research shows that most English language learners:
- can take up to two years to develop social interaction skills in English
 - can take up to seven years to achieve English proficiency that will support real academic achievement (Lu et al. 2025)
 - depend on rigorous, professional EAL/D teaching and support to achieve these timelines.
- 31 The Policy should require that schools exclude from NAPLAN testing First Nations students who are in the Beginning Phase of learning to read and write in English according to the ACARA EAL/D Progressions (or equivalent).
- 32 The Policy should recommend that the Commonwealth Department of Education require State and Territory Governments to report on — and make publicly available — data from assessments of EAL/D learning as well as NAPLAN assessments.
- 33 The Policy should include provision for assessments of EAL/D learning to be regionally or centrally moderated to promote accuracy of EAL/D data before lodging these data in State and Territory data caches.
- 34 The Policy should require educational institutions and State and Territory governments in receipt of Policy funding and resources to report on outcomes using their recognised EAL/D assessment procedures.

Competency-Based Training and Assessment in the VET Sector

Curriculum and Teaching

- 35 The Policy should promote assessment approaches in Foundation Skills provision that align with the developmental nature of language learning for First Nations EAL/D learners. This includes encouraging assessment practices that recognise staged demonstration of competence, partial achievement and cumulative learning over time, rather than reliance on binary competent/not yet competent judgements that obscure genuine progress.
- 36 The Policy should recommend that assessment design and moderation for EAL/D learners be informed by recognised EAL/D expertise and frameworks. This includes the use of English language learning progressions and other linguistically informed tools to ensure that assessment practices reflect how language and literacy actually develop in multilingual contexts.

Access

- 37 The Policy should provide clear guidance that linguistically responsive assessment practices are legitimate and necessary conditions of access for First Nations EAL/D learners. This includes recognising differentiated evidence types, extended assessment timelines, and oral, visual and multimodal demonstrations of learning as valid expressions of competence in Foundation Skills programs.
- 38 The Policy should encourage education systems and providers to address assessment-based barriers to participation and completion. Informed by NCVET evidence, this includes discouraging assessment practices that function as gatekeeping mechanisms by conflating English proficiency with vocational capability.

Employment and Working Conditions

- 39 The Policy should recognise assessor capability in EAL/D as central to fair and valid assessment practice for First Nations learners. This includes signalling the importance of professional knowledge of language development, multilingualism and Indigenous Englishes in assessment design, judgement and moderation.
- 40 The Policy should encourage jurisdictions and training authorities to consider the workforce implications of linguistically responsive assessment. This includes recognising EAL/D expertise within professional roles, workloads and professional learning, rather than treating such expertise as incidental or optional.

Accreditation and Assessment

- 41 The Policy should recommend that the Commonwealth and State and Territory governments require accreditation authorities to review the suitability of rigid units of competency structures for Foundation Skills provision for First Nations and other EAL/D learners. Alternative models — such as modular, portfolio-based or non-linear approaches — should be explored where these better capture cumulative language, literacy and numeracy development.
- 42 The Policy should provide direction to accreditation and regulatory bodies that fairness and flexibility in assessment include accommodation of emerging English proficiency. This includes supporting assessment practices that recognise multilingual meaning-making and do not privilege narrow demonstrations of Standard Australian English.
- 43 The Policy should require that assessment and accreditation reforms be evaluated for their impact on First Nations participation, engagement and identity. In particular, reforms should be assessed for whether they reduce reliance on English-only norms and instead support pathways that recognise multilingualism as an educational and economic asset.

FOCUS AREA 4: INSTITUTIONS, STRUCTURES AND POLICIES

- 44 The Policy should ensure the development and use of nationally consistent data on proficiency levels in both First Nations languages and Standard Australian English, so that language use and language learning are made visible and supported within education systems, progress can be meaningfully monitored over time, and decisions about curriculum, teaching, resourcing and accountability are informed by accurate evidence.

Abstract

This submission to the First Nations Education Policy team is presented by the Australian Council of TESOL Associations (ACTA). Its central argument is that the Discussion Paper's silence on language must be reversed to avoid a critical policy failure. An estimated 26,600 First Nations school-aged students speak traditional Indigenous languages, new and emerging contact languages, or Indigenous Englishes and are learning Standard Australian English as an additional language or dialect. When policy fails to name these learners, their linguistic identities, educational needs and right to equitable participation in schooling are rendered invisible.

The submission argues that language must be explicitly addressed in all aspects of the Policy – not as a peripheral cultural consideration, but as a foundational element in all four focus areas. Drawing on the National Indigenous Languages Report, the submission begins by establishing a conceptual framework that distinguishes between traditional languages, new and emerging languages, and First Nations Englishes. It introduces the concepts of linguistic repertoire, language ecology and contexts for language use. Within this framework, learning Standard Australian English is understood as an extension of learners' existing multilingual repertoires. These concepts provide a basis for each focus area that is linguistically explicit, informed and responsive.

The submission focuses directly on **Focus Area 1 (Curriculum and Teaching)** and interprets **Focus Area 4 (Organisations and Accountability)** to include structures and policies. It also explores the implications of its recommendation for **Focus Areas 2 (access) and 3 (learning and working environments)**.

In addressing Focus Area 1 (curriculum and teaching), the submission first outlines the workforce capabilities required to deliver effective curriculum and teaching for First Nations EAL/D learners. It identifies four interconnected roles – for First Nations educators, EAL/D-informed classroom teachers, EAL/D specialist teachers, and area-based EAL/D consultants – and sets out the policy conditions needed to support each. It requests the forthcoming Policy to provide for mandatory EAL/D content in initial teacher education, recognition of specialist expertise within professional standards, and system-level staffing and professional learning structures that treat language expertise as essential educational infrastructure rather than optional support. It then examines how curriculum, pedagogy and assessment shape learners' access to schooling and post-school pathways. It argues for the recognition and resourcing of bilingual and two-way programs as a normal mode of provision in Indigenous language-speaking communities, and for the strategic use of translanguaging pedagogy to support learning in linguistically diverse settings. It further demonstrates the need for assessment approaches that are valid for English language learners, including the appropriate use of EAL/D learning progressions and reforms to mandated assessments, so that English language development is made visible and progress can be accurately recognised in schooling and the VET sector.

The final section addresses the institutional and policy context within which the proposed Policy sits (Focus Area 4). It traces the shift from program-directed Commonwealth funding to needs-based, school-level allocations. This shift has progressively dismantled EAL/D and bilingual provision, deskilled the teaching workforce, collapsed specialist teacher education, and created accountability arrangements in which expenditure on First Nations language learners is effectively unmonitored and unreported. Without structural intervention across all four of the Paper's focus areas – culturally responsive curriculum and teaching, access and transitions, culturally safe environments, and institutional accountability – this Policy will be residualised alongside its many predecessors. It will be overridden by the mainstream funding, staffing and assessment structures that it has failed to reform. The submission's forty-four recommendations seeks to support the Policy in delivering coherent, system-wide reform. By making language structurally visible and operationally protected, the Policy has the opportunity to move beyond aspiration and to address the long-standing inequities experienced by speakers of First Nations languages across schooling and post-school pathways.

I grew up living on my mother's country and my father's country. My education began through a Yolŋu education system. I was taught by my kin and learned about the world from my Yolŋu perspective.

When I went to school, I did not understand any English. I was moved back to Year 1, and the teachers explained concepts in my language. As an intelligent child, I quickly mastered the concepts because they were explained in my first language.

There are two important reasons why I achieved at school. First, I had a Yolŋu education until I was intellectually capable of understanding another world view and was strong in my Yolŋu identity. Second, I succeeded because Western concepts were clearly explained in my first language.

NT MLA Yingiya Mark Guyula (2018, October 2).

1. Introduction

The Australian Council of TESOL Associations (ACTA) welcomes the opportunity to contribute to the development of a First Nations Education Policy (henceforth the Policy).¹

ACTA is the peak professional body for educators in the field of English as an Additional Language or Dialect (EAL/D). The Council consists of representatives from state and territory TESOL associations, whose members include teachers, consultants and curriculum developers and researchers. Our mission is to advocate for the educational interests of First Nations, refugee, migrant background and international students in all sectors (Early Childhood Education, schools, adult, community and tertiary education) who are learning English as their second or additional language, and for all those who teach EAL/D learners in specialist and mainstream classrooms.

This submission is based on input from the ACTA Consultancy Group on English as an Additional Language or Dialect (EAL/D) for Aboriginal and Torres Strait Islanders (henceforth the ACTA Indigenous EAL/D CG). This Group consists of teachers, school consultants, and TAFE and University educators.

Our main concern with the *First Nations Education Policy Discussion Paper* (henceforth the Discussion Paper) is its total silence on the crucial role of languages in the education of First Nations students. An estimated 26,600 First Nations school students speak Australian Indigenous languages (Angelo et al., 2019). These include traditional languages, new languages and English-based dialects (see section 2 below). Most of these speakers live in remote areas with minimal contact with English and are learning Standard Australian English as their second or additional language or dialect at school (ACTA, 2021). The foundational place of their languages in their lives and communities – and therefore their engagement with school, the curriculum and post-school pathways – has been consistently ignored in policy, plans and reviews of Indigenous education.

The silence about languages in the Paper continues a long-standing trend in educational policy-making in all sectors. ACTA has advocated in this space for decades, as our website attests. This submission uses material – with the assistance of Microsoft Copilot – from multiple recent submissions, which, we regret to say, have largely been ignored.

In line with the Paper's failure to reference language as a central issue, ACTA notes with disappointment that First Languages Australia is not mentioned as a partner in the development of this Policy. Comprehensive work on possibly every aspect of the Paper has been done under the auspices of the *Winhangarra* project: a major review of best practice in implementing the *Framework for Aboriginal Languages and Torres Strait Islander Languages*, high-quality training resources and materials to support the ongoing development of skills of Indigenous language workers, and

¹ TESOL = Teaching English to Speakers of Other Languages.
<https://tesol.org.au/>

development of a culturally appropriate national workforce strategy for Aboriginal and Torres Strait Islander language educators, including community language teachers/assistants working in schools; teachers in the school classroom, and linguists (university trained and community based).²

Our first recommendation is therefore:

Recommendation

1. Development of the Policy should include:
 - an in-depth review of the *Winhangarra* project: its contribution and achievements, progress in implementing its recommendations and utilising its resources, and
 - a “next steps” plan of action.

This submission begins by outlining a framework for thinking about both First Nations languages and the place of English. We commend this framework to you in guiding the Policy.

Our submission directly addresses two of the focus areas outlined in the Discussion Paper, which we interpret as follows:

Focus Area 1: Curriculum and teaching.

Focus Area 4: Accountability, systems and policies.

Discussions of both have implications for focus areas 2 (access) and 3 (employment and working conditions). Following our recommendations in each section, we will outline these implications. We reference mainly school education but also include some discussion of the Vocational Education sector. Much of what we present applies in many ways to Early Childhood education.

2. Language: key concepts and terminology

The outline below draws extensively from the National Indigenous Languages Report (Dinku et al., 2020; see also Angelo, 2021; Shnukal, 1985). We recommend that linguistically and culturally authoritative concepts and terminology, such as those below, be applied in developing the Policy.

These concepts demonstrate clearly why references to “culture”, “cultural responsiveness” and “cultural safety”, such as those in the Discussion Paper, comprehensively fail to capture key concepts that the future Policy should utilise. “Cultural safety” is a weak and misleading description of pedagogy and assessment in which students are constantly corrected, misunderstood and evaluated only through Standard Australian English and with no support for English language learning or respect for the way they speak.

In contrast to these weak and patronising notions, First Nations bodies emphasise that Indigenous languages are sources of authority, agency and self-determination, not markers of vulnerability. Within this understanding, learning Standard Australian English is not a corrective response to linguistic deficit but an extension of an existing and often complex linguistic repertoire, enabling First Nations learners to exercise power across educational, civic and economic domains. Policy approaches that frame language primarily through generic notions of “culture” or “cultural safety” risk obscuring the central role of languages – both Indigenous languages and English – as resources through which First Nations peoples participate, act and govern.

2.1 First Nations languages

In referring to First Nations languages, the Policy should distinguish between – but also include consideration of – three main language groups/types:

² <https://www.firstlanguages.org.au/yalbilinya>

Traditional languages: These are Australian languages spoken by Aboriginal and Torres Strait Islander people prior to colonisation, and the directly descended language varieties spoken today. Some are strong languages still spoken by children; others are being learned or renewed.

New /emerging languages: These Australian languages have formed since 1788 from language contact between speakers of traditional languages with speakers of English and/or other languages. New languages have historical influences from their source languages, including English, but they are not automatically understood by Standard Australian English speakers.

First Nations Englishes: Across Australia there are Aboriginal and Torres Strait Islander ways of speaking English which differ somewhat from Standard Australian English, but which Standard Australian English speakers can more or less understand. These are varieties of English just as American English is a variety of English.

In what follows, reference to “First Nations languages”, “Indigenous languages” and “Aboriginal and Torres Strait Islander languages” refers to these three language groups.

2.2 Standard Australian English

The Policy should recognise the role of Standard Australian English (SAE) in education and should deploy the term accurately to refer to the range of formal varieties of English used in the public domain, in formal speech and most published documents, for example, by government authorities, universities, schools, etc.

Standard Australian English is both the medium and mediator of formal education at all levels. It is the pathway to employment, broad civic participation and expanded personal wellbeing.

2.3 Patterns of language use

The Policy should reflect a clear understanding of patterns in how First Nations’ languages and English are used:

1. For some First Nations students, a traditional Indigenous language is their first language *and* English is their additional language.
2. For some First Nations students, a new Indigenous language (a contact language, for example, a creole) is their first language *and* their additional language(s) is/are one or more traditional Indigenous language(s) and/or English.
3. For some First Nations students, English is their first language *and* a traditional Indigenous language and/or a new Indigenous language is/are their additional languages.

Students whose language use matches 1 or 2 above are **learners of English as an additional language or dialect (EAL/D)**.

2.4 Linguistic repertoire and language ecologies

A useful concept that we recommend the Policy adopt is **linguistic repertoire**. This term refers to how individuals use their languages, including their level of proficiency in each.

A second and related concept is **language ecology**. This refers to the socially governed configurations of use in specific communities and social groups – “the languages used in a particular place”.

2.5 Contexts for language use

Like everyone else, First Nations people are diverse. First Nations peoples have different language repertoires, depending on where in Australia they come from and/or are located, their families’

histories and their individual life experiences. The Policy must find a way to delineate how the education system can respect, support and strengthen both Indigenous languages and English according to the existing and potential roles languages play in the lives of First Nations people. A useful concept to describe the roles languages play in people's lives is **contexts for language use**.

Dinku et al. (2020) identify three main Aboriginal and Torres Strait Islander contexts of language(s) use (see also Angelo et, 2019):

- 1) Language(s) for **being**
- 2) Language(s) for **engagement and access**
- 3) Language(s) to earn a **livelihood**.

The same or different languages may play a role in these different contexts and serve different purposes for First Nations students of any age.

Languages for being can be traditional, new languages or Aboriginal Englishes. They can be learned by Aboriginal and Torres Strait Islanders as the home or second/additional language. *Languages for being* link an individual with a group, a shared history and an area of country. Having this identification, shared history and group/land link acknowledged by others strengthens both the individual's and group's sense of identity (Berry & Hudson, 1997). Traditional Indigenous languages provide enduring links to country and culture, a sense of identity and community, and a potential means of healing and redress (Merlan, 2007).

Languages for being are therefore the language(s) whose use(s) is/are important in fostering self-worth, mental health and a sense of belonging to a safe, supportive, distinctive and vigorous community.

Languages for engagement and access can be traditional and new Indigenous languages, Aboriginal Englishes and SAE. They can be spoken and learned as first/home languages or as additional languages. They may be the same language(s) as those for 'being' but the contexts and ways in which they are used are more instrumental.

Languages for engagement and access are languages that give access to networks, opportunities and services. In most situations and communities, and especially in formal education, SAE is a crucial language for engagement and access.

Languages to earn a livelihood involves both traditional languages and new languages learned as first languages, and also traditional languages that are learned as an additional language. Indigenous language proficiency can be an asset in gaining employment. It may be an explicit selection criterion for jobs or required for effective communication in a community. Economic benefits and opportunities can follow from speaking Indigenous languages, particularly but not exclusively in the domains of art and culture, land care, tourism, education and training, broadcasting and interpreting and translating.³

The role of SAE in gaining employment and economic advancement is clear. However, proficiency in traditional and new Indigenous languages is a potential strength in gaining employment.

Within this conceptual framework, learning Standard Australian English (SAE) is seen – at the individual level – as *extending a person's linguistic repertoire*. At the societal level, SAE must be understood in relation to *contexts in which it plays a role for individuals and groups*, that is, its place in the linguistic ecology of a community and the broader society.

³ See also Table 2.2 (p. 27) in [National Indigenous Languages Report | Office for the Arts, Department of Infrastructure, Transport, Regional Development, Communications and the Arts](#)

Recommendations

2. Systematic attention should be given to the role of First Nations languages and Standard Australian English in all dimensions and focus areas of the Policy.
3. The Policy should use authoritative and recognised terminology in its references to languages, language use and the role of languages in the education of First Nations students.
4. The Policy should be directed to strengthening and extending English language learners' linguistic repertoires, building and leveraging their proficiency in *all* their languages, and working to foster the richness of Australian language ecologies.

These recommendations point to the fact that meaningful access for First Nations students in all sectors and “safe”, non-racist working and learning environments depend on policy frameworks that name, recognise and systematise thinking about language and multilingualism. Relying on broad reference to culture will fail to address how language operates as a structural determinant of participation and success.

3. Focus Area 1: Curriculum & teaching – Teacher preparation and on-going professional development

The foundation of culturally and linguistically responsive curriculum and teaching practices for First Nations students is a qualified, knowledgeable and skilled teaching workforce.

Research consistently shows that teacher qualifications and ongoing professional learning are among the strongest predictors of student achievement. Teachers with strong content knowledge, qualifications in their field and relevant experience consistently produce higher outcomes, regardless of student background (Darling-Hammond, 2000; Boyd, Lankford, Loeb, & Wyckoff, 2006; Clotfelter, Ladd, & Vigdor, 2007; Betts, Rueben, & Danenberg, 2000).

The Policy must recognise and address the fact that curriculum reform and culturally responsive teaching depend on investing in teacher knowledge, skills, and professional expertise. In this section, we consider the role and associated training needs of:

- 1) First Nations educators
- 2) EAL/D-informed teachers
- 3) EAL/D specialist teachers
- 4) EAL/D area consultants

3.1 First Nations educators

Current national teacher-education policy settings place significant emphasis on increasing the participation of Aboriginal and Torres Strait Islander people in the teaching workforce, primarily through workforce and access mechanisms rather than curriculum reform. The Australian Government's *National Teacher Workforce Action Plan* prioritises alternative entry pathways, grow-your-own programs in rural and remote communities, and recognition of community-based educational experience in order to expand the First Nations teacher pipeline (Australian Government Department of Education [AGDE], 2025). Complementing this, the revised *Accreditation of Initial Teacher Education Programs in Australia: Standards and Procedures* issued by Australian Institute for Teaching and School Leadership introduces flexibility in admission requirements and supports Recognition of Prior Learning so that Aboriginal Education Workers, language workers and community educators can enter accredited programs without being excluded solely by conventional academic or English-testing barriers (Australian Institute for Teaching and School Leadership [AITSL], 2023). Together these measures acknowledge cultural and linguistic authority as a form of

professional capability and aim to localise the workforce in communities experiencing chronic teacher shortages.

The Policy should recognise that Aboriginal and Torres Strait Islander teachers, often employed as Aboriginal Education Workers or Teacher Assistants and Assistant Teachers⁴, occupy a structurally unique and irreplaceable role in Australian schooling. They should not be regarded as support staff; but as educators, cultural brokers and community representatives who are important in facilitating learning, building trust and maintaining strong school-community connections. AITSL (2023, para. 2) highlights that Indigenous educators' cultural knowledge is "integral to the development of culturally responsive pedagogy and inclusive school environments."

In bilingual and two-way programs, as authentic speakers of First Nations languages, these teachers are crucial in enabling students to develop both their first language and English. They are the bridge to curriculum content in both languages. Their mature linguistic knowledge is the foundation for conveying lesson content meaningfully, supporting literacy and learning across languages, and fostering students' strong linguistic and cultural identities. With appropriate professional development, they can gain unique bicultural and bilingual professional skills to teach and integrate curriculum requirements effectively, and use pedagogical strategies appropriate to learners.

Indigenous educators who speak local languages and belong to the community are uniquely placed to promote student engagement, achievement and wellbeing. Beyond their classroom expertise, these teachers carry recognized authority in their communities and can strengthen connections between school, family and local culture. In remote schools and other schools where the majority of students are First Nations, their presence fosters engagement, maintains cultural continuity and can facilitate learning that is relevant and respectful. In urban or mixed-population schools, they serve as role models and authoritative cultural resources, supporting First Nations students in maintaining identity and language, and other students in developing respect and cross-cultural understanding. Their dual authority – as educators and respected community members – enhance both student learning outcomes and the broader cultural and social environment of the school.

Research shows that Aboriginal and Torres Strait Islander teachers influence school-wide strategies for engagement, attendance and identity affirmation. Parish (2015, p. 12) notes that they "contribute meaningfully to instructional work and curriculum development, not merely administrative or classroom support tasks." They co-design curriculum, embed Indigenous knowledge and guide other teachers in effective approaches to First Nations students (Armour & Miller, 2024, p. 7; AITSL, 2023, para. 4). Armour and Miller (2024, p. 7) report that their work positions them "at the intersection of pedagogy, culture, and community," challenging deficit-based notions of schooling for First Nations students.

While the value of Aboriginal staffing is well recognised, their presence in schools has reduced following the loss of targeted programs (see section 5 below). The Indigenous Education Consultative Meeting (IECM) Submission to the Review of the National School Reform Agreement noted:

... with concern the tendency to place a large cultural load on these staff e.g. they are turned to for expertise in relation to curriculum planning and delivery relating to Aboriginal and Torres Strait Islander histories and cultures, and for support in recognising days of significance (such as NAIDOC and Reconciliation weeks). While it is absolutely important to value Aboriginal and Torres Strait Islander employees' lived experience and community connections, schools and teachers must take ownership of their roles and ensure they are not unfairly shifting the responsibility to these positions that have less formal authority. It is also important to ensure that these staff receive appropriate training to support their ongoing development. (Indigenous Education Consultative Meeting [IECM], n.d., p. 6)

⁴ In NT bilingual schools, Aboriginal staff performing crucial support roles in classrooms are referred to as "Assistant Teachers" to acknowledge the central role they play in supporting student learning.

A teacher member of our Consultancy Group described his lived experience as follows:

First Nations teachers are over-burdened when they are the only First Nations person on staff and are automatically allocated to lead the Indigenous program in a school, even, as in my case, when employed as a relief teacher and/or from a completely other locality. Local knowledge, cultural competence and cultural nuance in local contexts are extremely important. Often the pressure is too great and is a major cause of stress and teacher resignations.

The loss of Indigenous staffing positions in schools has also deprived adults in remote communities of a pathway and incentive to further study and to develop their literacy skills. This loss also sends a message to communities that their languages and culture lack value.

The Policy should recommend dedicated investment in expanding the recruitment, employment and professional development of Indigenous teachers, Assistant Teachers and other education workers, both in remote community schools and mainstream campuses. Pathways into formal qualifications should include on-site English language and study skills support, culturally appropriate assessment and professional growth that respects and builds on their unique knowledge, skills and potential contribution. Wilkinson (2019, p. 55) stresses that pathways should ensure “Indigenous Education Workers can access career progression without losing their community authority or pedagogical knowledge.” Properly supported, these teachers strengthen First Nations education outcomes and advance culturally grounded, equitable schooling for all students (AITSL, 2023, para. 6).

For a comprehensive analysis of issues relating to pathways and employment of First Nations teachers, see *Yalbilinya: National First Languages Education Workforce Strategy* (First Languages Australia [FLA], 2021).

Recommendations

5. The Policy should prioritise support for the culturally and linguistically appropriate training, recruitment and on-going professional development of Indigenous teachers, Assistant Teachers and other education workers, both on-site locally in schools and in more formal campus situations.
6. This support should include support to jurisdictions in planning, resourcing, improving, upgrading and evaluating one or more purpose-designed Remote Aboriginal Teacher Education programs that build on the experience of the Northern Territory RATE trial (which ran from Feb-June 2021 in 4 communities).

These programs should:

- contain appropriate content for experienced Assistant Teachers in remote schools, which respects and builds on their knowledge as speakers of Aboriginal languages and their status as cultural custodians in their communities
- offer qualifications at levels that are directly tied to jurisdictions’ salary scales
- ensure adequate support for enrolled Assistant Teachers to develop their academic English skills
- be delivered by teacher educators who are:
 - employed onsite in the remote schools participating in the program
 - qualified, experienced and competent in EAL/D and bilingual pedagogy in remote contexts
- be progressively extended to other communities with relatively large populations; these communities could be designated as “hubs” for more comprehensive coverage

- include the following stakeholders in developing and accrediting the Program(s):
 - employing authorities or training providers (e.g. Charles Darwin University and Batchelor Institute)
 - accreditation authorities (the Australian Institute of Teaching and School Leadership/AITSL, the Australian Qualifications Authority/ASQA, and State/Territory Teachers Registration Boards).
- 7. The Policy should include provision for requiring jurisdictions to maintain and publish an annual record of the total number of Aboriginal and Torres Strait Islander Teachers and Assistant Teachers employed in their schools.
- 8. The Policy should be based on an in-depth analysis and review of work by First Languages Australia, including *Yalbilinya: National First Languages Education Workforce Strategy*.⁵

These recommendations are crucial to ensuring appropriate curriculum and teaching for speakers of First Nations languages, by explicitly recognising language use and multilingual development as foundational to learning rather than as peripheral cultural considerations. They are also fundamental to improving access to education and to sustaining a multiracial education workforce that reflects, strengthens and enhances its communities, by supporting educational environments and system settings that are responsive to First Nations peoples' educational needs, linguistic realities and rights.

3.2 EAL/D-informed teachers

The policy documents that govern the preparation of classroom teachers and their on-going professional practice, including gaining promotion, are the *National Teacher Workforce Action Plan* and the *Accreditation of Initial Teacher Education Programs in Australia: Standards and Procedures*.

These crucial documents are silent on the need to equip pre-service teachers to meet the needs of English language learners, including First Nations learners. They contain no recommendations – much less requirements – that teachers understand second-language acquisition, multilingualism, or the culturally and linguistically diverse speech varieties spoken by Aboriginal and Torres Strait Islander students. Both foreground literacy, especially phonics instruction, and favour one-size-fits-all literacy practices that assume students are mother tongue English speakers. Despite stated commitments to evidence-based instruction, they ignore evidence that pertains to EAL/D learners and learning (ACTA, 2023). We return to this issue in section 4.3 below.

ACTA has long advocated for embedding mandatory EAL/D-informed content in Initial Teacher Education (ITE) programs. The *ACTA submission on the Teacher Education Expert Panel Discussion Paper* argues for compulsory ITE units on EAL/D pedagogy, the inclusion of language and linguistics knowledge in core content, and the expansion of professional standards to encompass capability in teaching EAL/D and Indigenous language learners, which would better align ITE with the realities of schools and support both First Nations and other EAL/D students (ACTA, 2023). The *ACTA EAL/D Elaborations of the Australian Professional Standards for Teachers* (ACTA, 2015) illustrate the detailed knowledge and skills that should be expected of teachers working with EAL/D learners.

The Policy should address the issue of including EAL/D-informed content in Initial Teacher Education programs and in the AITSL Standards for Teachers.

Recommendations

9. To ensure all teachers have the necessary knowledge and skills for effectively teaching EAL/D learners, all Initial Teacher Education (ITE) candidates should be required to

⁵ <https://www.firstlanguages.org.au/yalbilinya>

complete at least one mandatory unit on EAL/D teaching and learning in their initial teacher education program.

10. AITSL's Australian Professional Teaching Standards should encompass supplementary standards frameworks for teaching EAL/D learners, drawing on ACTA's *EAL/D Standards Elaborations* and *AITSL's Capability Framework for Teaching Aboriginal and Torres Strait Islander EAL/D Learners*. ITE core content should draw from the multi-disciplinary knowledge that underpins teacher education, curriculum and pedagogy, and recognize this knowledge as informing core content for ITE.

Effective access to the curriculum and to the opportunities that formal schooling provides for First Nations English language learners requires school leadership and system responsibility. In employing teachers, systems must support school principals to build working environments in which all teachers are EAL/D-informed. Meeting AITSL Standards 1.3 and 1.4 requires staffing models, professional learning structures and conditions of work that embed EAL/D expertise as core infrastructure – just as systems do for Mathematics and Science – rather than treating language expertise as optional, peripheral or culturally implicit.⁶

3.3 EAL/D specialist teachers

Specialist teachers of English as an Additional Language or Dialect (EAL/D) play a critical role in supporting First Nations learners whose first language is a traditional Indigenous language, a new or emerging contact language, or an Indigenous variety of English. Standard Australian English is a key language for both engagement and employment (see section 2.5 above), and is needed to access curriculum, succeed in assessments and gain credentials, often in contexts where English is not the dominant language of the home or community. EAL/D specialist teachers provide the linguistic, pedagogical and advocacy expertise required to ensure that learning SAE extends learners' linguistic repertoires rather than positioning their languages as obstacles to achievement (ACTA, 2022; Angelo et al., 2019).

What EAL/D specialist teachers do

EAL/D specialist teachers must be capable of working across a range of educational settings and delivery models, including bilingual and two-way programs, withdrawal and in-class support programs, and team-teaching with mainstream teachers. In schools serving speakers of First Nations languages, they support students to develop proficiency in SAE while explicitly valuing, maintaining and building on students' existing linguistic knowledge in their first languages and Indigenous Englishes (Angelo, 2021; Shnukal, 1985). This includes designing and implementing explicit language teaching that makes visible the linguistic demands of curriculum texts, classroom interaction and assessment tasks, and supporting the development of oral language, literacy and academic registers across learning areas (ACTA, 2015; ACTA, 2022).

Beyond direct teaching, EAL/D specialist teachers provide expert advice and resources to classroom teachers, school leaders and education systems. They support accurate identification of EAL/D learners, interpret English language proficiency data and assist teachers to differentiate curriculum, pedagogy and assessment so that First Nations English language learners can demonstrate curriculum learning rather than being positioned as “vulnerable” or “failing” (ACTA, 2015; ACTA, 2023). In contexts where traditional and new Indigenous languages are spoken, EAL/D specialists also contribute to the development of bilingual and multilingual resources, support translanguaging pedagogies, and work collaboratively with Indigenous educators and community language speakers to align classroom practice with local language ecologies (Angelo et al., 2019).

⁶ **AITSL Standard 1.3** requires teachers to “demonstrate knowledge of teaching strategies that are responsive to the learning strengths and needs of students from diverse linguistic, cultural, religious and socioeconomic backgrounds”.

Standard 1.4 requires “knowledge and understanding of the impact of culture, cultural identity and linguistic background on the education of students from Aboriginal and Torres Strait Islander backgrounds.”

Specialist knowledge and skills required

Effective EAL/D specialist teachers require deep and explicit knowledge of the English language, including phonology, grammar, vocabulary, discourse and pragmatics across spoken and written modes as appropriate to different levels of schooling and beyond. This knowledge enables teachers to analyse the linguistic demands of curriculum content and to teach English explicitly in ways that are responsive to learners' language backgrounds (ACTA, 2015).

In addition, EAL/D specialist teachers require informed knowledge of First Nations languages and Englishes, including patterns of multilingualism, language contact, language shift and maintenance, and the social meanings attached to language use in different communities (Angelo et al., 2019). Intercultural knowledge and skills are central to this role, including the capacity to work respectfully and collaboratively with Indigenous educators, families and communities, and to understand the linguistic ecologies of the communities in which they teach. EAL/D specialists must also be able to interpret and mediate mainstream curriculum and policy requirements in ways that recognise First Nations learners as EAL/D learners rather than as deficient English speakers, and to advocate for appropriate provision within schools, systems and tertiary institutions (ACTA, 2022; ACTA, 2023).

Erosion of specialist preparation and qualifications

Despite the critical importance of EAL/D specialist expertise, opportunities for specialist pre-service education and higher-level qualifications in EAL/D have significantly diminished across Australian universities. Research indicates that relatively few Initial Teacher Education programs offer dedicated units focused on preparing teachers to work with EAL/D learners, and even fewer address the specific linguistic and educational needs of First Nations English language learners (De Courcy et al., 2021). As ACTA has consistently documented, specialist EAL/D pathways that once existed have been progressively eroded, resulting in a shrinking pipeline of teachers with advanced expertise in EAL/D pedagogy (ACTA, 2019; ACTA, 2022). We return to this point in section 5.

Why this has occurred

The erosion of specialist EAL/D preparation reflects structural policy settings rather than a lack of need. The loss of targeted EAL/D and bilingual program funding has reduced demand for specialist teachers and undermined the sustainability of specialist teacher education programs (ACTA, 2019). At the same time, the Australian Professional Standards for Teachers and national teacher-education policy settings do not require specialist knowledge of second language acquisition, multilingualism or Indigenous language contexts, rendering EAL/D expertise effectively invisible (ACTA, 2015; ACTA, 2023). This broader policy silence on language is mirrored in the First Nations Education Policy Discussion Paper, creating a substantial risk that First Nations English language learners will continue to be underserved unless EAL/D specialist roles are explicitly recognised, mandated and resourced.

Recommendations

11. The Policy should explicitly recognise EAL/D specialist teachers as essential to achieving equitable educational outcomes for First Nations learners who speak traditional Indigenous languages, new or emerging languages, and Indigenous Englishes.
12. The Policy should recommend the reinstatement and expansion of specialist pre-service and postgraduate qualifications in EAL/D, including coursework that explicitly addresses First Nations languages, multilingualism, bilingual education and Indigenous Englishes.
13. The Policy should require that AITSL accreditation standards and professional frameworks explicitly recognise EAL/D specialist expertise, including advanced knowledge of language, linguistics and multilingual pedagogy as a valued and necessary component of teacher professionalism.

14. The Policy should mandate the collection and public reporting of data on the provision of EAL/D specialist teachers across jurisdictions, including qualifications held, deployment models and access for First Nations learners.

Effective access to the curriculum for First Nations English language learners requires schools staffed with specialist EAL/D teachers, who – like those with expert knowledge in Maths and Science – are an integral part of the teaching force. EAL/D specialist teachers contribute to building a productive and well-balanced teaching staff in their special role of supporting and informing colleagues across the curriculum. Staffing decisions are now the responsibility of principals, but consistent provision of specialist EAL/D teachers requires systems and policy support (see section 5).

3.4 EAL/D area consultants for schools

Area-based EAL/D consultants have historically played an important system-level role in supporting schools to meet the needs of English language learners. However, even before the loss of designated EAL/D consultant positions, the Aboriginal and Torres Strait Islander loading did (and does) not explicitly recognise English language learning needs (ACTA, 2019). EAL/D consultants were constrained in extending specialist guidance to schools and teachers on identifying First Nations EAL/D learners, interpreting English language proficiency data, supporting curriculum and assessment differentiation, advising on bilingual and multilingual pedagogies, and building teachers' linguistic knowledge and capability (ACTA, 2015; ACTA, 2022).

The loss of dedicated EAL/D funding has further weakened this support. EAL/D consultant positions have been largely reduced, merged with general literacy coaching for mother-tongue English speakers, or reframed under broad headings such as “cultural inclusion”, “equity” or “wellbeing”. The specialist EAL/D knowledge (outlined above in section 3.4) has become incidental or entirely absent from many consultant roles (ACTA, 2019; ACTA, 2023). Where EAL/D consultants continue to exist, they are often responsible for large geographic regions and large numbers of schools, making sustained, comprehensive, context-specific and linguistically informed support impossible (ACTA, 2022).

The Policy must address the silence on how the Aboriginal and Torres Strait Islander loading is conceptualised and used and the systemic under-provision of specialist EAL/D consultancy to support schools in meeting the needs of First Nations English language learners (ACTA, 2023; De Courcy et al., 2021).

Recommendations

15. The Policy should explicitly recognise the need for area-based consultants as essential system-level support for First Nations speakers of traditional Indigenous languages, new or emerging languages, and Indigenous Englishes, including English language learners.
16. The Policy should provide clear guidance on defining language consultant roles that combine expertise in supporting First Nations languages and English language learning; these roles should not be subsumed within mother tongue English literacy, cultural inclusion, wellbeing or equity functions where language and linguistics knowledge is incidental, optional or absent.
17. The Policy should recommend the reinstatement and adequate resourcing of designated language consultant positions, with manageable workloads that enable sustained, context-specific support to schools, particularly in remote, regional and high-need contexts.
18. The Policy should recommend that the Schooling Resource Standard (SRS) Aboriginal and Torres Strait Islander student loading explicitly recognise English language learning needs. Alternatively, the low- English proficiency (LEP) loading should include First Nations English language learners.

Area-based consultants with expertise in First Nations languages and EAL/D play a critical role in supporting schools and teachers to program and teach in ways that enhance access to the curriculum for First Nations English language learners, by providing informed guidance on language-responsive pedagogy, assessment and curriculum design. Their work supports coherent whole-school approaches, enabling schools to move beyond isolated classroom responses and to build shared understandings and practices that recognise multilingual learners and strengthen equitable access across the school.

3.5 Post-school pathways into teaching and other employment/professions

The issues identified above in relation to language, multilingualism and the erosion of EAL/D expertise apply equally to post-school pathways, including vocational education and training (VET), higher education and other tertiary and employment-linked programs. Current VET and higher-education reform agendas emphasise improved access, participation, retention and completion for First Nations learners. However, these objectives cannot be achieved without explicit recognition of English language learning needs for students who speak traditional Indigenous languages, new or emerging languages, or Indigenous Englishes. In post-school systems that operate almost exclusively through Standard Australian English, the absence of linguistically informed support results in First Nations learners being framed as “under-prepared” or “at risk”, rather than as multilingual learners navigating new academic, technical and institutional language demands.

Effective post-school pathways therefore require a shift from generic or remedial learner-support models to embedded, course-specific English language support that aligns with disciplinary, vocational and professional language demands. This includes contextualised academic language and literacy support linked to VET competencies and higher-education assessment practices; professional development for mainstream lecturers, trainers and assessors to build capability in teaching and assessing EAL/D learners; and the employment of Study Skills and learning-support staff with explicit knowledge of second-language development, Indigenous Englishes and First Nations language ecologies.

In addition, strengthened transition support is required to assist First Nations learners to navigate entry, progression and completion within post-school systems, including enrolment processes, assessment expectations, digital platforms and institutional cultures that are often linguistically complex and opaque. Without explicit policy attention to language, multilingualism and EAL/D expertise in post-school education – mirroring the silence identified in the First Nations Education Policy Discussion Paper – current reforms risk reproducing structural barriers to student success rather than delivering the equitable outcomes they seek to achieve.

Recommendations

19. The Policy should explicitly recognise English language learning as a core access, participation and student-success issue within VET and higher-education pathways for First Nations learners.
20. The Policy should support cross-portfolio collaboration with post-school systems to ensure that English language learning needs are visible within post-school reform agendas, including through guidance, funding levers and capability-building initiatives that encourage providers to embed course-specific English language and academic literacy support aligned to vocational competencies and disciplinary assessment practices.
21. The Policy should support targeted professional development for lecturers, trainers and assessors to build capability in teaching and assessing First Nations EAL/D learners within reformed VET and higher-education frameworks.

22. The Policy should promote informed transition and learner-support models that include EAL/D-knowledgeable Study Skills staff and pathway advisors, ensuring First Nations learners can successfully enter, navigate and complete post-school pathways.

Successful transition to post-school education – and the opportunity for First Nations peoples to return to or access education at later points – depend on explicit recognition of English language barriers that shape both entry requirements and learners' ability to remain engaged and succeed once enrolled. Without targeted, First Nations language and EAL/D-informed support to navigate application processes, institutional language demands and ongoing course requirements, post-school pathways risk functioning as exclusionary gateways rather than as genuine opportunities for participation and completion.

4. Focus Area 1 (cont.): Curriculum, Teaching and Assessment – Programs

The focus areas outlined in the Discussion Paper do not reference assessment. Assessment has a profound effect on what is taught and how, and never more so than currently. If the Policy is to have any substantive effect, it must address the issue of assessment in both the school and VET sectors.

In this section, we consider two effective approaches to curriculum and teaching that centre First Nations languages and knowledges. The Policy must prioritise strengthening and extending:

- 1) bilingual, two-way programs
- 2) translanguaging approaches.

We then turn to two mandated aspects of curriculum and teaching in Australian schools. Here assessment is central. Neither are culturally or linguistically responsive to speakers of First Nations traditional and emerging languages or varieties of English:

- 3) Current approaches to teaching basic literacy and phonics in schools
- 4) NAPLAN testing.

Finally, we turn to curriculum and assessment in the VET sector, where the rigid, competency-based approach is distinguished by its lack of responsiveness to learners across the board, and not least First Nations students.

4.1 Bilingual two-way programs

The estimated 26,600 First Nations school-aged students who speak traditional or emerging Indigenous languages mostly live in remote communities where these languages are the primary language of daily life. They encounter SAE largely through schooling and, from the beginning of formal schooling, most are expected to learn curriculum content through Standard Australian English.

International and Australian evidence consistently identifies the language of instruction as a central condition of access to learning. The following illustrates the effect of English-only instruction for First Nations students in remote communities:

“We don’t retain information – we hear teaching, especially in English and feel that we don’t grasp what is being taught, and so it disappears. We go to school, hear something, go home, and the teaching is gone. We feel hopeless. Is there something wrong with our heads because this English just does not work for us? In the end, we smoke marijuana to make us feel better about ourselves. But that then has a bad effect on us. We want to learn English words but the teachers cannot communicate with us to teach us. It is like we are aliens to each other. We need radio programs in [traditional Indigenous] language that can also teach us English. That way we will understand what we learn.” (Australian Human Rights Commission, 2011, p. 61)

Bilingual/two-way programs support conceptual learning and participation through the first language while English is developed explicitly as an additional language. They strengthen students' overall linguistic repertoires rather than treating their languages as obstacles.

Nationally, bilingual and two-way programs remain unevenly available and weakly embedded in system provision, with access varying widely across jurisdictions and typically reliant on discretionary, even corporate, short-term funding rather than guaranteed policy settings (First Languages Australia, 2021; ACTA, 2022). Bilingual provision is typically framed as optional or supplementary rather than as a core response to learners' language ecologies. For example, in the Northern Territory – where Indigenous-language-speaking communities are most concentrated – only nine government schools are currently funded as bilingual schools. Evidence from parliamentary proceedings suggests that several operate with reduced scope and are comprehensively bilingual (Northern Territory Legislative Assembly, 2025).

Effective bilingual and two-way programs depend on the collaborative work of First Nations educators who are speakers of the local language, teachers with specialist knowledge of EAL/D and bilingual pedagogy. As outlined earlier in section 3, First Nations teachers bring linguistic authority, cultural knowledge and continuity, while trained EAL/D teachers contribute explicit expertise in language development, curriculum language demands and multilingual pedagogy. Resource centres develop materials, support teaching and professional learning, and sustain program quality over time. Where one of these components is absent, bilingual programs are weakened.

The Policy must move well beyond notions of “culture responsiveness” and attend to the concrete conditions required for bilingual and two-way programs to function effectively.

Recommendation

23. The Policy must:

- recognise the educational needs of communities where English functions as a second or foreign language and require instructional models that provide first-language-medium teaching alongside explicit English as an Additional Language or Dialect (EAL/D) instruction, rather than assuming English as the default medium of learning
- specify bilingual and two-way programs as a normal mode of provision in Indigenous language-speaking contexts, rather than as discretionary, supplementary or transitional initiatives
- provide stable, recurrent and protected funding for bilingual and two-way programs, ensuring that allocated funding cannot be diverted, diluted or discontinued through local administrative decisions without community agreement
- require staffing models for bilingual and two-way programs to include both:
 - i. First Nations teachers who are speakers of the local language, and
 - ii. teachers with recognised specialist training in EAL/D and bilingual pedagogy, with clearly defined and complementary roles in curriculum delivery.
- ensure continuity and sustainability of bilingual provision by requiring jurisdictions to plan for staffing succession, professional learning and program continuity when personnel change, rather than allowing programs to collapse due to workforce turnover
- support nationally recognised training, employment and career pathways for both First Nations language teachers and EAL/D specialist teachers

- embed safeguards for community authority so that decisions about the establishment, continuation or modification of bilingual and two-way programs are made with, and not merely for, the relevant First Nations communities.

High-quality, well-supported bilingual, two-way programs are essential to all four focus areas outlined in the Paper. They provide genuine access to the curriculum for First Nations students in remote communities where English functions as a second or foreign language. They strengthen identity and demonstrably value First Nations knowledge through sustained, productive relationships between schools, community elders and families. They create and support employment, working conditions and post-school pathways through recognised educational and career pathways for local Teacher Assistants and language advisors, embedding First Nations languages, authority and expertise within schools, systems and policies.

4.2 Translanguaging

Translanguaging is an important complement to bilingual and two-way programs. It involves teachers encouraging and structuring students' use of all their languages to support comprehension and concept development, for example, discussing ideas in a first language or creole, reading or viewing texts in one language, and explaining, writing or presenting learning in another. This may include students moving flexibly between traditional languages, contact languages, Aboriginal Englishes and Standard Australian English within lessons, with teachers drawing attention to meaning, concepts and language differences rather than enforcing rigid language separation (Wigglesworth, 2020; Oliver et al., 2024).

Indigenous students in remote and regional Australia are commonly multilingual, speaking two or more Indigenous languages or a creole alongside limited or no English on school entry. Within such ecologies, translanguaging practices make visible the linguistic work students are already doing, allowing teachers to support meaning-making, conceptual understanding and participation, without artificially separating languages in ways that do not reflect lived communicative practice (Wigglesworth, 2020; García & Wei, 2014). Translanguaging can extend bilingual programs by enabling students to draw flexibly on their full linguistic repertoires in classroom interactions. It is particularly relevant in contexts where formal bilingual programs are constrained by high levels of linguistic diversity, limited staffing, or the absence of locally dominant first languages. In these settings, strategic translanguaging allows teachers to acknowledge and leverage students' existing linguistic resources while still working systematically towards increased proficiency in Standard Australian English as the language of schooling. Rather than positioning Indigenous languages or contact varieties as interference, translanguaging reframes them as cognitive and pedagogical resources that support access to curriculum content.

Importantly, translanguaging does not remove the need for explicit English language teaching or specialist EAL/D expertise. Australian research consistently emphasises that translanguaging is most effective when used deliberately and knowledgeably, informed by an understanding of students' language repertoires and the structural differences between Indigenous languages, creoles, Aboriginal Englishes and Standard Australian English (Wigglesworth, 2020; Oliver et al., 2024). Used in this way, translanguaging supports continuity between home and school language practices, mitigates deficit framings of multilingual learners, and provides a pedagogical bridge in contexts where full bilingual provision is not currently achievable – while remaining aligned with longer-term goals of strengthening Indigenous languages and English within coherent language ecologies.

Recommendation

24. The Policy should:

- align translanguaging with other commitments to sustaining Indigenous languages and supporting learners to extend their linguistic repertoires in all domains

- provide professional learning for teachers in schools and VET settings to develop the linguistic and pedagogical knowledge required to use translanguaging strategically, avoiding deficit framings of multilingual learners and strengthening continuity between home and school language practices
- promote the use of translanguaging in contexts where bilingual provision is constrained by high levels of linguistic diversity, limited staffing or the absence of a single dominant community language, as a means of enabling curriculum access without denying or marginalising students' home languages.
- outline best practice in implementing translanguaging practices deliberately and systematically, informed by knowledge of and respect for students' language repertoires.

Translanguaging approaches support First Nations students' knowledge of and pride in their diverse linguistic repertoires by legitimising the full range of languages they use for meaning-making, situating these within the wider linguistic ecology of the community. In doing so, they strengthen students', teachers' and schools' connections with, and appreciation of, the community's languages, knowledge and practices. Translanguaging approaches open up curriculum and teaching in a dynamic and culturally expansive way (Focus Area 1), deepen and enhance student access to the curriculum and learning (Focus Area 2), and build respectful, inclusive classrooms and whole-school environments (Focus Area 3).

4.3 Current approaches to teaching basic literacy and phonics in schools

Recent Australian education policy has strongly endorsed synthetic phonics as the primary foundation for early reading instruction and basic literacy learning. The *Better and Fairer Schools Agreement (2024)* links Commonwealth funding for schools to the administration of a Year 1 Phonics Check and is supporting implementation of synthetic phonics approaches through the Australian Literacy and Numeracy Hub. This policy closely follows directions set by authorities in England, where synthetic phonics has dominated for over a decade. Synthetic phonics approaches have become the dominant organising concept in early literacy.

Along with other EAL/D learners, this policy positioning raises significant concerns for mother tongue speakers of First Nations languages. Synthetic phonics programs are built on an implicit English mother-tongue learner model. They focus on “decoding” (i.e. sounding out) that is divorced from contextual or meaning-based strategies, that is, comprehension. This focus assumes learners already control English phonology, vocabulary and grammar and can map print onto known spoken words. It fundamentally misrepresents the starting points of First Nations EAL/D learners, positioning the mother tongue simply and solely as a source of deficit and vulnerability, and potentially triggering misplaced diagnoses and interventions that undermine learners' linguistic identities and strengths.

The mandatory Year 1 Phonics Check, based on synthetic phonics approaches and assumptions, requires students to read aloud 40 isolated “real” and pseudo-words. It is comprehensively invalid and unreliable for EAL/D populations, including mother tongue speakers of Indigenous languages because those administering and interpreting the Check cannot determine whether and how EAL/D learners are drawing on other phonological systems. Normal cross-linguistic transfer is routinely misinterpreted as decoding failure.

ACTA is currently finalising a position paper on the Issues created by synthetic phonics approaches for EAL/D learners & teachers, which will be available on our website.⁷ ACTA does not oppose phonics instruction. We unequivocally support systematic and explicit teaching of English sound–

⁷ <https://tesol.org.au/>

symbol relationships, including for First Nations learners. However, a fundamental principle is that phonics must be embedded within EAL/D-informed literacy pedagogy that builds strong oral English foundations, values learners' existing linguistic knowledge, integrates phonics with meaning-making, and teaches multiple decoding strategies. For First Nations EAL/D learners, this requires teachers with specialist EAL/D expertise, access to bilingual and two-way programs, and assessment practices that locate reading English within the broader challenge of learning English.

Recommendations

25. The Policy should recommend that it be standard, routine practice for jurisdictions to provide and update teachers with:
- accurate advice on the nature of phonemic systems in general and, wherever possible, relevant features of the phonological systems of the First Nations EAL/D learners they currently teach,
 - face-to-face professional development in:
 - i. understanding these resources
 - ii. how to investigate why a First Nations student is challenged in interpreting and producing particular English phonemes, and distinguishing between them
 - iii. appropriate and enjoyable listening activities in distinguishing English phonemes in meaningful contexts (e.g. age-appropriate games and rhymes)
 - iv. strategies for teaching English pronunciation, stress, rhythm and intonation.
26. The Policy should require Commonwealth funded supports for phonics teaching and assessment, including the Australian Literacy and Numeracy Hub, to:
- explicitly recognise First Nations languages (traditional languages, Kriols and emerging languages, and Aboriginal Englishes) as systematic linguistic systems
 - include explicit and differentiated guidance on First Nations learner profiles and linguistic ecologies (i.e. role of traditional languages, Kriols and emerging languages, and Aboriginal Englishes – see section 2.5) as they relate to the implications for English literacy learning
 - include resources for teachers with First Nations speakers of traditional Aboriginal languages, Kriols and Aboriginal Englishes Aboriginal Englishes.
27. The Policy should specify that First Nations EAL/D learners who are assessed as in the *Beginning, Emerging and Developing Phases* on the ACARA English as an Additional Language/Dialect (EAL/D) Learning Progression (or other State assessments used for EAL learners) should not be assessed against Phonics Checks based on synthetic phonics principles. Their reading proficiency should be documented against EAL/D-specific assessment tools.
28. The Policy should state that the use of pseudo-words and decodable texts has no place in teaching reading to First Nations students, irrespective of the languages they speak, including English. It should strongly recommend that the explicit, systematic teaching of grapheme/phoneme relationships to First Nations students occurs in the context of multiple exposure and practice opportunities in oral English and the English sound system (its phonology, intonation and stress patterns), vocabulary development and Standard

Australian English grammatical structures, spoken and written genres, and pragmatic and sociocultural knowledge and skills. Reading material should be selected in line with the learner's overall proficiency in English on a recognised proficiency measure.

As currently framed and mandated, synthetic phonics approaches run counter to the aspirations of Focus Areas 1 - 4: they position First Nations languages and English language learning as impediments rather than resources for capability-building (Focus Area 1), expose First Nations English language learners to misplaced intervention and remediation rather than appropriate EAL/D pedagogies (Focus Area 2), and operate through inherently deficit and marginalising assumptions about multilingual learners (Focus Area 3). The embedding of these assumptions in current policy settings, resourcing decisions and the mandatory Phonics Check entrenches these effects at system level (Focus Area 4). The Policy must urgently address how early literacy and assessment priorities and resources can be aligned with language-responsive, non-deficit approaches to First Nations and other English language learners.

4.4 NAPLAN

NAPLAN benchmarks are normed on mother-tongue English speakers in urban Australian contexts. As such, NAPLAN cannot validly assess the academic performance of First Nations learners who are acquiring Standard Australian English as an additional language or dialect. The data generated for these students is misleading because it takes no account of English proficiency levels. The accompanying Language Background Other Than English (LBOTE) identifier is an inaccurate and unreliable proxy for English language proficiency because it includes monolingual mother tongue English speakers, one of whose parents/caregivers speaks a language other than English in the home.

For many of the approximately 26,600 Indigenous students in remote communities where English is a foreign language, NAPLAN benchmarks are unreachable. Requiring all students to sit NAPLAN effectively mandates failure for First Nations English language learners, who are in the Beginning or Emerging phases of learning to read and write in English and cannot meaningfully engage with assessments pitched well beyond their English proficiency. ACTA has reports of students being instructed to sit quietly and colour in bubbles on test pages. Being assessed in a language they are still acquiring is demoralising and alienating.

NAPLAN failure does not occur in isolation. Students are also routinely awarded "E" grades on school reports because their learning is assessed against the Australian Curriculum rather than against recognised EAL/D learning progressions. This double positioning as failing – through both national testing and school-based reporting – is a significant driver of disengagement and early school withdrawal for First Nations EAL/D learners.

High-stakes reliance on NAPLAN has narrowed curriculum and pedagogy through intense pressure on schools to improve test results. In many settings, this has resulted in "teaching to the test", with increased time devoted to test-taking strategies. For First Nations EAL/D learners, this is particularly damaging, as it displaces the structured, expert EAL/D teaching required to develop the oral and written academic language necessary for curriculum access across learning areas.

Since 2008, NAPLAN has functioned as a central accountability measure under Closing the Gap. Despite substantial expenditure, outcomes for First Nations students have shown minimal improvement – not because of limited ability or aspiration, but because the assessment instrument is inappropriate for English language learners. Because English language proficiency is not disaggregated within the broader First Nations cohort, NAPLAN cannot track EAL/D learning trajectories or progress. Teaching, funding and resourcing decisions are therefore made on faulty data, while genuine English language learning remains invisible, unrecognised, unsupported and unacknowledged. Persistently poor results reinforce public and political deficit narratives about Indigenous literacy, rather than prompting critical scrutiny of the tool itself.

NAPLAN's national status has entrenched the false assumption that learning literacy is equivalent to learning English. Policy, funding and intervention strategies are routinely directed through a NAPLAN lens, while EAL/D assessment data is sidelined. Panic over NAPLAN scores drove the replacement of bilingual programs and specialist EAL/D teaching with English-only instruction and the major expenditure on inappropriate commercial remedial literacy programs. In the Northern Territory, for example, poor NAPLAN results triggered the adoption of Direct Instruction, a costly American scripted program designed for remedial English-speaking students, which in some communities prevented students from reading or writing for extended periods. Its subsequent replacement by Read Write Inc – a synthetic phonics program designed for English contexts in the UK – has continued this pattern, in some cases teaching students to “read” English before they can speak or understand it, with minimal transfer to broader curriculum learning (see section 4.3 above).

Ironically, evidence presented by ATESOL NT to the 2021 *Parliamentary Inquiry into Adult Literacy and Its Importance* included an analysis of NAPLAN data from 2015 and 2019 demonstrating that schools implementing genuine bilingual-biliterate pedagogy outperformed English-only schools across the majority of NAPLAN test categories. Data also showed how attendance collapsed in at least two Northern Territory schools following the shift to English-only instruction.

The sustained focus on NAPLAN has progressively deskilled the teaching workforce by displacing knowledge of the ACARA EAL/D Learning Progression and other linguistically informed pedagogy and assessment. EAL/D-specific professional learning has been displaced by training to deliver commercial programs for failing mother tongue English speakers (Creagh et al. 20023). NAPLAN has also been used to set policy targets that are impossible for EAL/D learners assessed against mother-tongue norms, creating a culture of institutional evasion and a damaging disconnect between system-level expectations and classroom realities.

In short, NAPLAN is not merely an inadequate assessment instrument for First Nations EAL/D learners. It actively drives harmful policy choices, erodes the specialist teaching infrastructure these learners require, and sustains a self-reinforcing cycle of failure, disengagement and institutional dysfunction.

Recommendations

29. The Program should recommend the development of a nationally consistent measure of English language learners' proficiency, including First Nations learners, as a matter of urgency, and that this be used to inform interpretations of NAPLAN results and guide EAL/D provision.
30. The Program should include explicit recognition that well-established research shows that most English language learners:
 - can take up to two years to develop social interaction skills in English.
 - can take up to seven years to achieve English proficiency that will support real academic achievement (Lu et al. 2025).
 - depend on rigorous, professional EAL/D teaching and support to achieve these timelines.
31. The Program should require that schools exclude from NAPLAN testing First Nations students who are in the Beginning Phase of learning to read and write in English according to the ACARA EAL/D Progressions (or equivalent).
32. The Program should recommend that the Commonwealth Department of Education require State and Territory Governments report on – and make publicly available – data from assessments of EAL/D learning as well as NAPLAN assessments.

33. The Program should include provision for assessments of EAL/D learning be regionally or centrally moderated to promote accuracy of EAL/D data before lodging these data in State and Territory data caches.
34. The Program should require educational institutions schools and State and Territory governments in receipt of Program funding and resources to report on outcomes using their recognised EAL/D assessment procedures.

Like the current endorsement of synthetic phonics and the mandatory Phonics Check, NAPLAN undermines the Policy's aspirations across Focus Areas 1 - 4. Grounded in mother-tongue English norms, it fails to recognise First Nations EAL/D learning trajectories and language development as capability-building (Focus Area 1), is a documented source of alienation and withdrawal from schooling (Focus Area 2), positions learners and communities through a deficit lens of failure (Focus Area 3), and at system level renders English language learning progress and needs largely invisible (Focus Area 4). The Policy must counter reliance on NAPLAN as a raw accountability measure and prioritise the disaggregation of student data by English language proficiency, so that First Nations EAL/D learners' progress is recognised, valued and further supported.

4.5 Competency-based training & assessment in the VET sector: Evidence from recent NCVER research

Recent NCVER research provides strong empirical evidence that current competency-based training and assessment frameworks in the VET sector systematically disadvantage EAL/D learners, including many First Nations young people. NCVER's national studies of Foundation Skills provision demonstrate that the difficulties experienced by these learners are not incidental or attributable to individual deficits, but are structural consequences of assessment and accreditation systems built on monolingual Standard Australian English norms.

NCVER's 2025 research documents that many First Nations students enter Foundation Skills courses as EAL/D learners, often speaking traditional Aboriginal languages, Kriol or Aboriginal English as their primary language(s). Despite this, course design and assessment practices routinely assume students already possess sufficient spoken and written English to demonstrate competence through prescribed written and oral evidence in Standard Australian English. NCVER reports that learners experience this misalignment as being judged on English proficiency rather than on vocational understanding, problem-solving or workplace capability.

NCVER evidence of systemic misrecognition, not learner failure

A central finding of NCVER's research is that disengagement from Foundation Skills courses is not driven by lack of motivation or aspiration, but by assessment structures that fail to accommodate learners' linguistic starting points, cultural obligations and learning trajectories. Learners reported high commitment to education and strong aspirations for employment and further training, yet withdrew when assessment practices repeatedly misrecognised what they knew and could do.

This evidence directly reinforces the broader argument of this submission: where assessment systems conflate English language development with competence, EAL/D learners are positioned as underperforming regardless of genuine learning progress. NCVER shows that binary "competent / not yet competent" judgements are particularly ill-suited to language-mediated foundation learning, where progress is cumulative, recursive and meaning-based rather than immediately observable through fixed assessment artefacts.

Competency-based assessment as a structural barrier for EAL/D learners

NCVER's findings highlight a fundamental tension between the developmental nature of language and literacy learning and the rigid architecture of competency-based assessment. While ASQA standards emphasise fairness and flexibility, NCVER documents that, in practice, assessment

requirements privilege decontextualised demonstrations of competence in Standard Australian English, leaving little room for staged achievement, partial demonstration or multilingual meaning-making.

For First Nations EAL/D learners – particularly those acquiring spoken English, literacy and vocational knowledge simultaneously – this rigidity results in repeated assessment failure despite observable learning gains. NCVER’s research shows that assessment timelines and evidence requirements are misaligned with how English actually develops as an additional language or dialect, leading learners to be excluded from successful completion even where teaching is supportive and culturally respectful.

Reinforcement of English-only norms across the education continuum

Importantly, NCVER situates these problems within a broader pattern that mirrors schooling experiences described earlier in this submission. Foundation Skills courses frequently operate in isolation from commitments to First Nations language maintenance, bilingual education and EAL/D-informed pedagogy. The absence of explicit recognition of First Nations languages within accredited VET provision sends a clear message that these languages have no value in formal learning or employment pathways.

NCVER’s evidence confirms that this continuity of English-only assessment norms from schooling into post-school education reproduces the same barriers that earlier bilingual and EAL/D approaches seek to address. Rather than representing a fresh start, Foundation Skills courses often re-expose First Nations learners to assessment regimes that again misrecognise multilingual repertoires and ongoing English language development.

Implications for policy and accreditation reform

Taken together, NCVER’s recent research provides authoritative, system-level confirmation that current VET assessment and accreditation frameworks are not neutral but actively shape patterns of exclusion for First Nations EAL/D learners. The findings underscore the urgency of reforming competency-based assessment models so that they can validly recognise learning achieved through emerging English, First Nations languages, Aboriginal Englishes and translanguaging practices, rather than privileging narrow demonstrations of Standard Australian English proficiency.

The NCVER research on Foundation Skills provision provides a concrete illustration of a wider systemic problem: the First Nations Education Policy must move beyond generic appeals to “cultural responsiveness” to address the mainstream structural arrangements across curriculum and teaching, access, employment and working conditions, and systems and policies, in which unexamined assumptions about language, English proficiency and assessment are embedded and continue to produce inequitable outcomes for First Nations learners.

Curriculum and assessment reform has implications for each of the Paper’s four focus areas, as indicated in our Recommendations below.

Recommendations

Curriculum and teaching.

35. The Policy should promote assessment approaches in Foundation Skills provision that align with the developmental nature of language learning for First Nations EAL/D learners. This includes encouraging assessment practices that recognise staged demonstration of competence, partial achievement and cumulative learning over time, rather than reliance on binary competent/not-yet-competent judgements that obscure genuine progress.
36. The Policy should recommend that assessment design and moderation for EAL/D learners be informed by recognised EAL/D expertise and frameworks. This includes the use of

English language learning progressions and other linguistically informed tools to ensure that assessment practices reflect how language and literacy actually develop in multilingual contexts.

Access

37. The Policy should provide clear guidance that linguistically responsive assessment practices are legitimate and necessary conditions of access for First Nations EAL/D learners. This includes recognising differentiated evidence types, extended assessment timelines, and oral, visual and multimodal demonstrations of learning as valid expressions of competence in Foundation Skills programs.
38. The Policy should encourage education systems and providers to address assessment-based barriers to participation and completion. Informed by the NCVER evidence, this includes discouraging assessment practices that function as gatekeeping mechanisms by conflating English proficiency with vocational capability.

Employment, working conditions and industrial relations

39. The Policy should recognise assessor capability in EAL/D as central to fair and valid assessment practice for First Nations learners. This includes signalling the importance of professional knowledge of language development, multilingualism and Indigenous Englishes in assessment design, judgement and moderation.
40. The Policy should encourage jurisdictions and training authorities to consider the workforce implications of linguistically responsive assessment. This includes recognising EAL/D expertise within professional roles, workloads and professional learning, rather than treating such expertise as incidental or optional.

Accreditation and Assessment

41. The Policy should recommend that the Commonwealth and State and Territory governments require accreditation authorities to review the suitability of rigid units-of-competency structures for Foundation Skills provision for First Nations and other EAL/D learners. Alternative models – such as modular, portfolio-based or non-linear approaches – should be explored where these better capture cumulative language, literacy and numeracy development.
42. The Policy should provide direction to accreditation and regulatory bodies that fairness and flexibility in assessment include accommodation of emerging English proficiency. This includes supporting assessment practices that recognise multilingual meaning-making and do not rest on right/wrong answers.
43. The Policy should require that assessment and accreditation reforms be evaluated for their impact on First Nations participation, engagement and identity. In particular, reforms should be assessed for whether they reduce reliance on English-only norms and instead support pathways that recognise multilingualism as an educational and economic asset.

5. Focus Area 4: Institutions, structures and policies

Focus Area 4 asks how education systems can be accountable and responsive to First Nations peoples. Answers to these questions require an understanding of the significant shift from program-directed policies to current “needs-based” settings. The development of a First Nations Education Policy essentially flies in the face of this shift.

Across the three decades from the 1980s to the 2010s, Australian policy for English language learners shifted decisively away from dedicated, program-targeted funding toward a model that claimed to allow schools to be more responsive to the needs of their student populations and

communities. In practice, this shift eroded specialist provision rather than strengthening it. The earlier model rested on Commonwealth Specific Purpose Payments: earmarked, tied funding that flowed directly to programs, including for English as a second language, underpinning specialist staffing and curriculum, and permitting accountability for outcomes (Michell, 2025a). From the 1990s onward, this model was progressively dismantled. First, "broadbanding," for English language provision pooled designated ESL funding into general grants and loosened the conditions that had protected program integrity. Finally in 2008, the national ESL program was disbanded, leaving provision entirely to the discretion of states, territories, and individual schools (Michell, 2025a).

The Gonski reforms of 2011, though framed as "needs-based" and equity-driven, compounded this dismantling by pairing school funding with school autonomy reforms that devolved resourcing and staffing decisions to principals (Michell, 2025b). Rather than restoring a protected funding stream for English language learners, needs-based funding was absorbed into flexible school budgets where EAL/D provision had to compete with other priorities. Specialist roles and programs were no longer guaranteed by policy design but became contingent on the priorities of individual school leaders and the pressures of micro-political contests in schools (Michell, 2025b). Neither broadbanding nor needs-based funding represented a neutral administrative shift. Both were intentional policy designs that displaced programs in favour of generic, deregulated funding arrangements.

Under the current Schooling Resource Standard (SRS), Commonwealth funding is allocated to systems and schools through a base per-student amount supplemented by loadings for identified forms of disadvantage. Decisions about staffing, programs and service delivery is devolved to school principals. In principle, this model is intended to enable local responsiveness. The loadings that underpin needs-based funding are calculated using census data. The Aboriginal and Torres Strait Islander loading is triggered by identification, while the low English language proficiency loading relies on the inaccurate proxy of Language Background Other Than English (LBOTE). Neither loading enables the identification of First Nations English language learners nor is it directed to their specific needs for expert EAL/D tuition or for the maintenance and development of their languages. As a result, the educational needs of speakers of First Nations languages systematically fall between categories and remain structurally unaddressed (Michell, 2025a; Michell, 2025b; ACTA, 2023a).

The consequences of this shift have been well documented. The move from tied, program-specific funding to untied school-level allocations has produced a massive loss of designated First Nations language programs, bilingual education and EAL/D provision across jurisdictions. With staffing decisions devolved to schools that must make choices in response to pressures across the entire curriculum, principals are frequently forced to treat EAL/D specialist teachers, First Nations teachers and Assistant Teachers as expendable positions rather than as essential infrastructure. These pressures are compounded by the national teacher recruitment and retention crisis, with the effects most acute in remote and regional schools where workforce instability is greatest. Even where schools nominally retain EAL/D positions, these teachers are now routinely redeployed as relief staff to cover absences, further eroding sustained language support for First Nations English language learners (Michell, 2025a; ACTA, 2023b).

As demand for EAL/D expertise has been suppressed within schools, its effects have flowed upstream into the higher education sector. The progressive disappearance of designated EAL/D roles in schools has led to a corresponding collapse in EAL/D teacher education pathways, from initial teacher education through to postgraduate qualifications. Australian universities now offer few dedicated programs preparing teachers to work with EAL/D learners, and even fewer that address the linguistic realities of First Nations students. This has resulted in a significant loss of high-level professional and institutional expertise in language learning -- encompassing First Nations languages, English as an additional language, and multilingual education -- further weakening system capacity to respond to linguistic diversity in schools (Michell, 2025b; ACTA, 2023a).

Taken together, these developments amount to the rapid erosion of a professional knowledge base in which Australia once led internationally, particularly in bilingual and multilingual education.

Research documenting successful bilingual programs in remote Indigenous communities demonstrates that this expertise was not only educationally effective but globally significant (Devlin, Disbray & Devlin, 2017). What is being lost is not simply a set of programs or positions, but an entire ecology of curriculum knowledge, assessment expertise, professional learning and community-based practice. The pace of this loss has accelerated under needs-based funding arrangements that assume local discretion can substitute for system responsibility in sustaining specialist knowledge (Michell, 2025a).

These outcomes are reinforced by the weak accountability mechanisms that attach to needs-based funding. National audits have repeatedly found that governments do not adequately monitor whether funds allocated for disadvantage are used for their intended purposes, nor whether they improve outcomes for targeted learners. The 2017 Australian National Audit Office (ANAO) audit, its 2021 follow-up, and state-level audits in NSW all point to a systemic failure of transparency and accountability in school funding. The last national review of English as a Second Language (ESL) funding occurred in 2006. Australia still lacks a nationally consistent measure of English language proficiency.⁸ Recent reforms under the Better and Fairer Schools agreements prioritise early literacy and phonics (see section 4.3 above).

Without addressing these structural conditions, the Policy risks following down the path of its predecessors. That is, it will be overridden by mainstream funding, staffing and accountability systems that continue to marginalise First Nations language learners. Unless the Policy finds ways to intervene in these institutional arrangements, its aspirations will remain subordinate to the very structures that have produced the current inequities.

Recommendation

44. The Policy should ensure the development and use of nationally consistent data on proficiency levels in both First Nations languages and Standard Australian English, so that language use and language learning are made visible and supported within education systems, progress can be meaningfully monitored over time, and decisions about curriculum, teaching, resourcing and accountability are informed by accurate evidence.

6. Conclusion

This submission has argued that language should not be a peripheral consideration in a First Nations Education Policy – it is central. The Discussion Paper's silence on language is not a minor omission. It reflects and reproduces a pattern of policy-making that has consistently failed speakers of traditional Indigenous languages, new and emerging languages, and Indigenous Englishes, including the estimated 26,600 school-aged students for whom Standard Australian English is an additional language or dialect. Unless language is explicitly named systematically addressed across every dimension of the Policy, these students will remain invisible – not because they lack ability, aspiration or presence, but because the structures designed to educate them have been built without acknowledging a fundamental pillar in their agency and the learning needs that follow.

To have effect, the Policy must address the way in which language issues have dropped from policy agendas, including for First Nations peoples. Bilingual and two-way programs that demonstrably support both Indigenous language maintenance and English language development have been defunded, narrowed or dismantled. EAL/D specialist teachers – the professionals with the expertise to teach English explicitly and responsively to First Nations language learners – have been rendered expendable by funding arrangements that do not recognise or protect their roles. Mandatory phonics instruction and NAPLAN testing, designed for mother-tongue English speakers in urban settings, have been mandated, including for children in remote communities where English is a foreign language, producing not only the discourse of failure but also systemic category errors. In the VET

⁸ <https://www.smh.com.au/politics/federal/government-rejects-bipartisan-call-for-more-scrutiny-of-school-funding-20191205-p53h63.html>;

sector, one-size-fits-all competency-based assessment frameworks have continued the same pattern. Across every sector and every stage, the structural consequence is the same: First Nations EAL/D learners are labelled, assessed, taught and funded as though their languages do not exist.

The shift from program-directed to needs-based funding, documented in detail in section 5, has compounded these harms by dismantling the institutional and professional infrastructure that once, however imperfectly, gave language provision a place in the system. Specialist EAL/D roles, bilingual program funding, language consultant positions and dedicated teacher education pathways have all contracted or disappeared under funding arrangements that route resources through school-level discretion rather than system-level responsibility. The loadings that nominally recognise Aboriginal and Torres Strait Islander students and English language learners neither identify First Nations EAL/D learners accurately nor direct funding toward their specific educational needs. Accountability for how these funds are used and whether they improve outcomes for English language learners is, as successive audits have found, effectively absent. The professional knowledge base Australia once held in multilingual and bilingual education – knowledge of global significance -- is eroding rapidly, with consequences for schools, teacher education institutions and communities alike.

If the First Nations Education Policy proceeds without explicitly addressing language issues, it will follow the trajectory of the policies that have preceded it. General commitments to "cultural responsiveness," "cultural safety" and "closing the gap" have been made before and the outcomes for speakers of First Nations languages have not improved because the structural arrangements that govern funding, staffing, curriculum and assessment were undermined. Mainstream institutional authority consistently overrides specific policy initiatives that do not embed their requirements in those same structures. A policy that does not mandate attention to language within funding loadings, accreditation standards, workforce frameworks, assessment systems and accountability mechanisms will be absorbed and neutralised by the very structures the policy seeks to implement.

What is required is not goodwill but architecture. That architecture must be built into each of the Policy's four focus areas if its aspirations are to be realised. Embedding culturally responsive curriculum and teaching practices (Focus Area 1) is impossible without mandatory EAL/D content in initial teacher education, protected funding for bilingual and two-way programs, and specialist teachers who understand how traditional languages, creoles and Indigenous Englishes interact with the acquisition of Standard Australian English. As the young person explained in section 4.1 above, until we not only "hear" teaching but can "grasp" it, we will go away to "smoke marijuana to make us feel better". Improving access to education services and transitions (Focus Area 2) requires assessment tools calibrated to English language learners' actual proficiency and learning trajectories, not NAPLAN benchmarks normed on mother-tongue English speakers that guarantee failure and drive disengagement. Creating culturally safe learning and working environments (Focus Area 3) demands far more than the language of safety and inclusion: it requires classrooms and institutions that explicitly value students' full linguistic repertoires, employ First Nations teachers and EAL/D specialists as essential rather than expendable staff, and refuse to position multilingualism as deficit. Transforming education organisations to be genuinely accountable and responsive to First Nations peoples (Focus Area 4) means embedding language and English language learning visibly within funding loadings, workforce frameworks, accreditation standards and public reporting requirements – so that the educational progress of First Nations EAL/D learners is measurable, reported and acted upon.

Each of these focus areas, as currently framed, risks remaining at the level of aspiration unless the structural arrangements that govern funding, staffing, curriculum and assessment are addressed. A policy that does not intervene in those arrangements will be absorbed and neutralised by them. Along with ACTA and other advocates, the speakers of traditional Indigenous languages, new and emerging languages, and Indigenous Englishes at the centre of this Policy have watched predecessor policies make similar commitments and deliver similar silences. This Policy will be residualised alongside them unless it has the structural reach to make language – and the people who speak languages other than English – finally, unambiguously visible.

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