



THE AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

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The Hon. Dr Anne Aly, MP,
Minister for Multicultural Affairs,
Parliament House,
Canberra.
ACT 2600.

1 September, 2026.

Dear Minister,

**RE: Reform of the Adult Migrant English Program (AMEP), including amendments to
the *Immigration Education Act 1971***

I write on behalf of the Australian Council of TESOL Associations (ACTA) and specifically as co-convenor of ACTA's Consultancy Group concerned with the teaching of English to adults. As you are aware from previous meetings with our representatives, including myself (18/08/2025; 22/11/2022), ACTA is the peak Council for State/Territory professional associations of educators concerned with teaching English to speakers of other languages (TESOL) in all educational sectors.

Our request is that you meet urgently with ACTA representatives in regard to forthcoming amendments to the *Immigration Education Act 1971* regarding eligibility for the Adult Migrant English Program (AMEP). As the responsible Minister, we assume you will be introducing these amendments and, further, that this will be in the October sitting of Parliament.

ACTA is grateful to have been included at the online briefing on 25th May 2026 regarding the reform of the AMEP. Although we welcome aspects of the proposed reform, we are deeply concerned about two key features, first, restrictions on eligibility and, second, changes to childcare arrangements. Both are clearly intended to reduce costs by restricting access to the AMEP.

Undermining migrants' and refugees' access to quality English language tuition will assist Pauline Hanson in her attacks on those who, as she puts it, don't speak English. Both the eligibility and childcare changes will have particularly adverse impacts on migrant and refugee women, which the Government's gender equity assessment, as promised by Minister Gallagher in 2022, will show – if, of course, it has been undertaken.

ACTA is mystified as to why the Albanese Government would seek to restrict access to a Program that so directly targets social cohesion in Australia – demonstrably more effectively than any other. Your expertise and earlier professional life mean that you certainly understand the foundational role of providing adult migrants with English and orientation to Australian life, including its core values.

Consultation

We do not understand why officials in the Department of Home Affairs Migrant English and Language Services Branch are currently refusing to consult with us and other stakeholders. The list of consultations on the Home Affairs website, on which the Department has said it is relying, all occurred in the context of the previous Coalition Government's extraordinarily misguided attempts to restructure the AMEP by paying providers for assessment results. Those consultations belong to another time – paradoxically when your opponents in Government sought to blame the AMEP for migrants' low levels of English.

Since Labor took office in May 2022, the ACTA Group that I co-convene has had productive meetings with your officials. On this basis, following the May stakeholder meeting we requested a "listening session" with the incoming Assistant Secretary, Ms Carmen Saunders, the purpose of which, we wrote, "would be simply and solely to provide space for you to hear from this group of committed and experienced AMEP educators about both problems and possible

solutions related to changes that may or may not have already been decided.” We undertook that the meeting would be “constructive and utterly committed to furthering the AMEP’s effectiveness” and simply aimed at alerting the Department to “undesirable, unforeseen consequences [that] seem inevitable but could be prevented.” The reasons given by Ms Saunders for refusing this meeting were “probity” and “the need for cost reductions to be urgently progressed in the 26-27 Budget context and future legislative time frames.”

We suspect this refusal to listen is not of these officials’ choosing. The “probity” reason is also implausible, given the precedent set in the consultations in 2022-23 (at which I represented ACTA) regarding reform of the Skills for Employment and Education (SEE) Program. A higher level requirement for cost savings is the more likely imperative.

ACTA accepts the need for cost reductions in the current economic climate. We have suggestions to make regarding cost efficiencies that would not impair the AMEP’s effectiveness or restrict access to the Program in counter-productive ways. More broadly, in every submission we have made over at least the last 10 years, we have argued for substantive reform to the AMEP, which would be either cost-neutral or cost-saving.

Childcare

In regard to childcare, this measure will, in effect, restrict migrant families’ access to childcare. If this is not the cruel intention, it is a cost-shifting move, not real cost saving.

From your former Early Childhood portfolio, you will know well that mainstream childcare places are failing to meet existing demand, particularly in inner city, rural and regional areas. Aside from the savings that will no doubt benefit the Department of Home Affairs’ own bottom line, it is hard to see how increasing demand for mainstream places by adding AMEP client's children will serve anyone's interests.

ACTA recognises that the provision of childcare within the AMEP attracts problems and cost inefficiencies, and that improving efficiency is complex. We are aware that some AMEP providers currently manage the payment of external childcare centres from within their contracted funding. We believe that you understand how and why embedded childcare is a key driver of women’s participation and success in this Program. Given this understanding, we respectfully request that you authorise your officials to engage in genuinely collaborative, in-depth consultation with existing providers, ACTA and other stakeholders towards developing an optimal solution to the effective and efficient provision of childcare to prospective AMEP students.

Eligibility

As with childcare, restricting AMEP eligibility will assist Home Affairs’ bottom line by shifting at least some costs to another portfolio, when those excluded from the AMEP continue the pattern of seeking English classes in the Skills for Employment and Education (SEE) Program administered by the Department of Employment and Workplace Relations.

ACTA accepts that changes to eligibility are needed. We have proposals as to what these should be. However, prior to your presenting amendments to the Parliament, clarification, consultation and careful thought are required as to what is intended by restricting eligibility to “migrants with the greatest need for structured English tuition” (as per the transcript of the 25th May meeting).

The **current** structuring of the AMEP curriculum does not serve migrants who would benefit most from skilled, professionally informed, settlement-focussed English tuition. It prioritises assessment, reporting and compliance over and above actual ***teaching directed to adult migrants’ English language learning needs***. At the end of this letter, I’ll provide testimony from the record of recent meeting with AMEP teachers, also attended by ACTA representatives, about some of the many problems afflicting the Program, including its currently “structured tuition”.

If the new eligibility requirements exclude those unsuited to its current structure, those excluded will include humanitarian entrants with minimal/no previous formal education, women with young children, others with caring responsibilities, those suffering from trauma and torture and those who cannot attend classes (especially in the daytime or weekdays) on a regular basis. These migrants are precisely those for whom the AMEP was originally designed with its needs-based curriculum and flexibility. This unique and previously world-leading settlement Program will simply duplicate other labour market programs.

The irony is that the current structures which govern AMEP providers as Registered Training Organisations (RTOs), and which are one significant contributor to the problems documented at the end of this letter, have been recognised as

unsatisfactory by the regulatory body, the Australian Qualifications Authority (ASQA), which is in process of reforming them.

The cost of urgency

We respectfully ask you to consider the danger of prioritising urgency above the need for genuine and effective reform that may also address the goal of cost savings.

The urgency with which the Government is proceeding is in danger of significantly undermining the very outcomes that the AMEP is intended to achieve. The short-term gains made by rushing through significant restrictions on eligibility and disrupting childcare will have undesirable long-term consequences, including for social cohesion, when people with insufficient English are encountered in other sectors, for example, health, education, employment and the justice system.

These counter-productive consequences could be avoided, or at least mitigated, if you and your officials were to engage in careful and genuinely collaborative consultation with stakeholders and those most deeply committed to and most involved in delivering the AMEP, including ACTA.

The AMEP once was acknowledged as a world-leading high-quality language and settlement program. Despite many setbacks – most recently those inflicted by the previous Coalition Government – the AMEP continues to be an initiative about which Australia can be proud. Delivered by hugely committed educators, it transforms the lives of people who have come here – helping them to find their place, and giving them tools to participate and contribute socially, culturally and economically. In ACTA's many submissions to Governments on both sides, we have consistently called for reform. However, for ACTA that means considered reform, including space for stakeholder views – not another destructive move, as appears to be facing us now.

We very much hope that you can respond positively to our request to meet prior to bringing the proposed amendments to Parliament. I can be contacted by email: helenmoore@tpg.com.au or phone: 0410 708 975.

Yours sincerely,



Helen Moore AM, PhD

Co-convenor

ACTA Adult Consultancy group on Adult ESOL (English for Speakers of other Languages).

cc. The Hon. Steve Georganas, Chair of Joint Standing Committee on Migration

Professor Chris Davison, ACTA President

Gillian Edmiston, Co-convenor, ACTA Adult ESOL Consultancy Group.

TEACHER TESTIMONY RE SOME OF WHAT NEEDS REFORMING IN THE AMEP

“Structured tuition”: curriculum, assessment and compliance with RTO requirements

- I have to teach to the test. It's a huge waste of printed resources and the instruments do not actually reflect what the students have learnt and are capable of doing in English.
- I have no issues with delivering recognised qualifications however, the current EAL Curriculum is not fit for purpose. ... It feels like a cobbled together curriculum and to assess 8 units in 400-500 nominal hours means teachers are teaching to assessment. We have had more students fail in this curriculum than any other curriculum due to the poor structure.
- I feel it is actually difficult to teach to what the students need because I am constantly teaching to the assessment requirements. The teaching can get repetitive, because many of the units have the same knowledge evidence and as there are a mix of old and new students, I constantly need to review, so new students know what they need for the assessment.
- Assessments are required to meet ASQA compliance requirements and therefore it has been hugely challenging to assess in authentic, life like and purposeful ways. If we could create engaging, authentic assessment tasks - that we could use to scaffold learning towards, students would be more motivated and engaged in the process. Some of the assessments do do this (however it is very dispiriting because students are required to demonstrate so many knowledge elements in every assessment task, failing if they leave just one element out - this is a VET thing, not an AMEP or EAL framework thing). If the curriculum were framed in recognising this, and specified that learners are required to incorporate knowledge 'such as' or 'for example'... or 'at least four of'... then TAFE quality teams could be less obsessed with students having to include at least two

different tenses and a phrasal verb and an adjectival and adverbial clause, and at least one modal verb and an idiom etc etc. None of us write or speak trying to keep in mind that in this task we MUST incorporate every one of these elements. Frankly it is ridiculous - and counterproductive to the task which has to become stilted and formulaic rather than fluent and natural - which is the real aim of the curriculum and assessment tasks.

- Teams of TESOL assessment design experts should design the assessments. A curriculum that better meets language needs of the students is needed. TAFE should do an audit of the skills and abilities existing among educators and utilise those people to help bring up the quality of delivery. TAFE should value the skills and capabilities educators have and pay them accordingly, so that staff can actually use their skills and abilities to enhance the curriculum, assessments and general TESOL teaching skills of teaching teams.
- The TAFE providers have warped the delivery of the AMEP and sucked the soul out of it to ensure compliance. It would help if more trust was placed in people with TESOL expertise and that starts with recognising quals. And recognising that delivering AMEP is a whole different ballgame to delivering industry training.
- Students need English language but they also need a lot of support and settlement classes. I try and add useful things into the class like community visits and incursions that will benefit the students but then I begin to run out of time for the students to complete their assessments.

Time-wasting compliance

- I have 27 Cert II students (19 - 20 each day). In the conversation and transaction unit, they each have to participate in 2 social conversations and 1 transaction of 3 - 5 minutes each. This is easily managed within the teaching week doing 3-5 each day over 4 - 5 weeks. I am able to listen back to each conversation (recorded) and mark each of the 19 criteria on the observation checklist in about 8 minutes - and let the students know the following day whether they achieved competency or if they left something out, what it was, and plan a retest. However, I am also required to type 'evidence' next to each criteria - either by creating a transcript, correcting it, and copying and pasting into the observation record - or by listening to a little section and typing relevant phrases, words, comments etc next to every criteria. This has to be done - despite my having ticked that the evidence is there, and saving the recording in the student's file - in case it gets audited - to save the auditor from having to listen to the conversation.

Having worked in schools for 20+ years prior to my 8 years in AMEP - I never had to document/justify every assessment decision I made. I was treated as a qualified professional, and selected evidence/examples for the purpose of providing feedback to the student (useful and educationally sound practice). I recently timed myself completing 8 assessment observation records for this speaking task, and averaging the time. 23 minutes per conversation. (plus the time spent in class actually conducting the assessment). That means about 15 minutes, per students of unnecessary paperwork, x 3 conversations x 27 students - for one Unit (oh yes + any retesting)!

Lack of flexibility

- Many students have health issues and hospital/ doctor appointments that make it very difficult to maintain 80% attendance at times. Students are being removed from class if they have 79.5 % attendance. One student was so worried about losing her place that she reluctantly left her nine year old child alone at home and had to be told that this was illegal.
- The 5 year cap has really affected regional women. Students in regional areas often study once a week as there is not capacity to study more. These students then only get a fraction of what their urban cohort are getting. Women who leave to have a child basically forgo at least 2 years of their five year cap and if they have two in that space, they will not be able to study for free at all.
- Long wait times on waitlists force students to find employment then when there is a place available in a class they often get 24-48 hours notice to change their lives around and make time for study. Then they don't meet the 80% attendance requirement and get withdrawn from their class that they have been waiting for so long for and go back on the waitlist. It's a revolving door.
- I also think that five hours a day of classes are too long for many students who are newly acquiring a language. There needs to be more flexibility with hours of delivery.
- Flexibility and less specific assessments, so that the assessments can be specific to what the cohort need in a contextualised manner. Students need English language but they also need a lot of support and settlement classes. I try and add useful things into the class like community visits and incursions that will benefit the students but then I begin to run out of time for the students to complete their assessments.
- Include one multi-level AMEP day per week per campus that is for excursions/incursions that is purely based on settlement outcomes with no EAL assessments attached to it. These sessions can provide practice and themed stimulus for the language units & more readily achieve settlement outcomes for students to integrate into the Australian culture and way of life.
- ...my Australian Masters in TESOL is not on the list of accepted qualifications. Therefore, my experience and qualifications are not taken into account and I have been told I need to start on step 1 of the 10 step payscale and to stay indefinitely at step 4. I am perfectly qualified and experienced to be an educator in AMEP. I feel that I cannot utilize the skills or capabilities I have to better student outcomes because I am unable to get beyond level 4 of the pay barrier, and yet I feel I have so much to offer.