3 November, 2026.

The Committee Secretariat
House of Representatives Standing Committee on Education
Inquiry into Factors Driving Educational Attainment

Dear Committee,

Re: Late submission – Australian Council of TESOL Associations (ACTA)

The Australian Council of TESOL Associations (ACTA) welcomes the opportunity to make a late submission to the Inquiry into the factors driving educational attainment. ACTA is the national peak body representing teachers, teacher educators and researchers through our state and territory member TESOL associations (TESOL = teaching English to speakers of other languages). In addition to supporting educators professionally, we advocate for quality provision for First Nations, migrant- and refuge-background students learning English as an additional language or dialect (EAL/D) in all educational sectors. In Australian schools, we calculate that EAL/D learners constitute in the order of three quarters of a million students.

Over the past twelve months, we have been closely considering the issues arising from Commonwealth's Government's 2025–2034 *Better and Fairer Schools Agreement*, which has made a specific approach to teaching literacy – known as Systematic Synthetic Phonics (SSP) – a central feature in Australian early literacy policy. The substantive claims made for this approach rests on the evidence claimed to support its contribution to educational attainment.

Commonwealth school funding is now tied to jurisdictions administering Year 1 Phonics Checks based on synthetic phonics principles. The online Australian Literacy and Numeracy Hub promotes this approach. State and Territory education authorities have mandated phonics checks and teaching using synthetic phonics principles. Funded intervention initiatives use commercially developed synthetic phonics programs and resources. These developments follow trends in the past ten years or so in England and the USA, and the Commonwealth approved Phonics Check is copyrighted to the UK Department for Education.[1]

Attached please find ACTA's position paper *Synthetic Phonics – Issues for Learners and Teachers of English as an additional Language or Dialect* (19/10/2026). We submit it to the Committee with the intention of alerting you to significant problems in these policy and pedagogic directions as they apply to teaching EAL/D learners to read English. Our evidence rests on:

- a comprehensive review of well-established theoretical principles, research and pedagogy relating to learning English as an additional language or dialect (see Sections 2 - 4 and our reference list)
- a detailed examination of six widely used commercial resources from the perspective of what is known from this research (see Section 5), and
- a sample Phonics Check from the National Literacy Hub (Section 6).

[1] https://www.literacyhub.edu.au/search/phonics-check-student-materials/

ACTA supports evidence-informed pedagogy, systematic and explicit teaching, and the teaching of English phonics as an important component of literacy instruction (see Section 3). However, there are significant problems with the specific *approaches* to teaching phonics currently promoted by educational authorities.

The underlying problem in the current policy and pedagogic promotion of synthetic phonics is the assumption that this approach is appropriate for teaching *all* learners how to read English, including EAL/D learners. This assumption is aligned with the false notion that equity means treating all people in the same way. If concessions are made to those who lie outside a pre-supposed "mainstream" by failing to meet attainment benchmarks, post-hoc "interventions" prescribe more of the same (see the 2025–2034 *Better and Fairer Schools Agreement*; also ACTA Position paper Section 4.3.3*)*.

A pedagogic approach cannot be considered evidence-based if it excludes relevant evidence – in this case, regarding how Standard Australian English is learned as an additional language or dialect. Nor can an approach be assumed suitable for all learners simply because additional support is available.

Educational research has long established the importance of taking learners' starting points into account. Learning to read in English as additional language or dialect is not the same as learning literacy. EAL/D learners' starting points differ fundamentally from those of young English-speaking children learning literacy in their mother tongue. EAL/D learners come to reading English with a different linguistic system, including established age-related phonology, vocabulary, grammar, semantics and pragmatics, all of which are tied to cultural and local knowledge and understandings. EAL/D learners begin learning English at various ages and across *all* Australian school levels, with corresponding differences in maturity, cognitive development, interests, experience and educational needs. Their prior experience of literacy and formal schooling varies considerably. These are not incidental differences to be accommodated separately from teaching English phonics. They are central to determining how reading English, including its phonics, should be taught.

The analysis of six widely used synthetic phonics resources and the sample Phonics Check in the ACTA position paper demonstrates the consequences of failing to consider diversity as foundational to policymaking. Designed primarily for young children who speak English as their mother tongue and entering formal schooling, the resources generally assume familiarity with English sounds, words and language structures (see Section 4.2). If the need to develop speaking and listening in English is addressed, it is treated separately from learning English sound-symbol relationships (see Section 5.5). These resources do not draw on what learners know from their first or other languages – much less support this knowledge – and in many cases do not acknowledge the existence of other languages (see Sections 4.2.2 and 5.2). They assume the English sound system is phonologically neutral and therefore do not account for the potential effects of the learner's phonological system (see Sections 2.1, 4.1, 5.3). In the case of the Phonics Check, this failure comprehensively invalidates its use as a diagnostic tool (see Sections 6 and Appendix M). "Decoding" is interpreted in ways which divorce learning, teaching and assessing phonics from any meaningful use of English – the assumption is that understanding and making meaning happens elsewhere (see Section 4.3). The resources pay no attention to the implications of learners' prior schooling (or lack thereof), and whether the learner has literacy in another language (see Section 4.2.3, 4.2.4 and 5.4). Their content assumes an urban, middle class, white language ecology and in some cases, the British English climate and way of life (see Sections 5.7 and 7). In short, these resources and the Phonics check are underpinned by a monolingual English perspective. They position those who do not match up as disadvantaged, vulnerable or in deficit (see Sections 5.1 and 6).

These limitations cannot be resolved simply by tweaking resources designed for young mother tongue English literacy learners or by providing "additional support" for those who do not fit this profile.

Teaching EAL/D learners to read English, including mastering English phonics, requires a systematic, comprehensive and integrated EAL/D-informed approach. Such teaching must recognise the linguistic resources learners bring to reading English, and respond to their ages, prior schooling, literacy experiences and cultural contexts. Teachers need the knowledge, resources and professional support to do this, not teaching scripts (see Table 4).

These problems identified in the ACTA position paper must also be understood in the commercial context within which literacy resources are marketed and adopted. Current policy mandates are supporting the promise that a one-size-fits-all approach packaged in an attractive, comprehensive, all-in-one program is a ready-made solution to complex educational challenges. This lucrative market has incentivised publishers to add components to their packages that are claimed to accommodate those who do not fit the original "mainstream" design. They do not address their fundamental mismatches.

The issue is, therefore, not simply whether individual resources can be improved. It is whether a system driven by mandates and packaged solutions can deliver equitable teaching while marginalising and failing to develop the expertise required to understand how diverse learners learn. Ignoring the needs of over three quarters of a million Australian is inequitable (see Section 2.2). This is not a failure of individual teachers and schools to provide enough additional support. It is a failure to make EAL/D learning an intrinsic consideration in policy, programs, resources, teacher education and professional development. More broadly, it is a failure to accept the fundamental principle that responding to and valuing the linguistically, culturally, socially, cognitively physically and gender diverse school population in Australia is central to policy development.

These concerns have important implications for First Nations students. A single linguistic starting point cannot be assumed for Aboriginal and Torres Strait Islander learners. Policy and pedagogy must be responsive to the *language ecologies* of these learners' various communities – the particular configuration of languages spoken there – and learners' different language repertoires. These may include any combination of traditional languages, new languages (including creoles), Aboriginal English, Torres Strait English and Standard Australian English. In remote communities, where English is largely encountered as a foreign language and almost entirely at school, equity principles demand that EAL/D learners be offered the same advantages as English mother-tongue literacy learners, namely, the opportunity to learn initial literacy in the language they speak and understand (see Sections 2.2.1 and 4.2.2). In complex multilingual settings for both First Nations and migrant-/refugee background learners, professional development in the pedagogy known as "translanguaging" should be standard practice (see supplementary reference list).

ACTA submits that promoting literacy attainment for *all* students must be situated within a broad, linguistically informed approach to teaching. Our position paper and its recommendations address the specifics of this approach as it applies to EAL/D learners. We hope that, in tackling the Inquiry's demanding task, the Committee can utilise the evidence and fundamental principles we have advanced here.

Yours sincerely,

[redacted]

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President

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Lead author ACTA Position Paper on Synthetic Phonics

Australian Council of TESOL Associations (ACTA)