Request for Feedback – Adult Migrant English Program future settings – Submission Form

AMES Australia's response to the Department of Home Affairs' request for feedback – Adult Migrant English Program future settings | December 2022

Overview

AMES welcomes this opportunity to provide input to AMEP future settings. This is informed by our long history of AMEP delivery, and more importantly by our commitment and operational experience of working closely with individual refugees and migrants.

The future setting for the AMEP would see the program reinstated as the government's flagship settlement program and would place it firmly in the settlement sector with other settlement programs. Positioning the AMEP in that settlement journey will re-orientate the program from its current position on the periphery of the VET system back to the broader settlement system with its dedicated focus on building skills and knowledge to enable new arrivals to navigate and thrive in Australia.

The AMEP supports the underpinning need to build English language skills being the lingua franca of Australia. The program model traditionally provides important wrap-around services that are recognised and valued – pathway guidance, volunteer support and childcare as examples. These components are important to remain in a future program setting.

The gaining of settlement-focused English language skills is greatest when learning is concrete and practical, with students having access to tuition outside the traditional classroom setting. It does not align well to the formal VET system. A future AMEP program setting does not need to be linked to prescriptive curriculum and the compliance regime of the VET sector. This misalignment has been a persistent issue for many learners who resist and fail to understand the relevance of a largely de-contextualised and heavily assessed curriculum.

There are operational models outside of the VET system that support English language development and its application across speaking, listening, reading, writing, and numeracy. These are progressively measured and demonstrate positive outcomes. These non-accredited programs are attractive to new arrivals as the focus is on applied learning methodologies to develop practical language skills that a new arrival needs, rather than what the accredited curriculum defines and assesses. The education provider has control of the evidence of achievement through progressive assessments in a range of contexts that are accessible, applicable and useful for the newly arrived learner. This may include evidence gathered through engaging in the community; family and friends; media (online, TV, radio); formal English classes; and employment.

For learners with higher levels of English competence and work or further study aspirations the AMEP can facilitate their progressive pathways into the vocational system by supporting concurrent enrolments, i.e. allowing AMEP students to enrol in accredited VET units as electives while completing their English program. Many students exit the AMEP only to find themselves unable to pass the entry requirements for VET courses. A future AMEP should focus on closing this gap and facilitate seamless entry into the further education and training system as a pathway destination for its learners.

Setting the context: The AMEP is a settlement program

The re-affirmation of the AMEP as a settlement program provides clarity to both the purpose and intended outcomes for participants in the program and acknowledges:

- English language skills are a key enabler of social and economic participation for migrant, refugee and humanitarian entrants to Victoria.
- The AMEP co-creates pathways with new arrivals that give control of the settlement journey to the learner to define and realize their vocational goals and aspirations, gain access to universal services and the means for active social and civic participation in the wider community.

- An appropriately configured AMEP program should contextualize its delivery in the goals and aspirations of the learner as defined by their identified settlement pathway and provide applied learning opportunities consistent with the settlement journey and processes.
- The AMEP can be customised to address needs of specific cohorts, some currently under represented, such as professional or semi-professional spouses with skills and experience in areas of high demand or those needing to change and transition into new career pathways.
- The co-creation of settlement pathways should not conflate the AMEP into a narrower and specific vocational education and training (VET) context or framework.

A: Optimising flexible delivery

1. **How should tuition delivery in the AMEP be structured and funded to best support flexible learning?**
2. **How can AMEP program settings better facilitate delivery of English language tuition in work settings?**
3. **How can AMEP program settings better facilitate delivery of English language tuition in community settings?**
4. **How can AMEP program settings better facilitate small class sizes, and which cohorts would benefit most from small classes?**
5. **How can AMEP program settings better support clients with a disability?**

The following principles of flexible delivery/flexible learning apply equally to education, work and community settings. They also apply to consideration of class sizes, working with specific cohorts and supporting clients with a disability.

What is flexible delivery? Flexible learning?

Flexible delivery is any one or any combination of the following, including tuition:

- through a digital medium or any combination of online, App-based, in-person, distance learning
- through workbooks/paper-based medium, where technology access is limited or as per client preference
- that is place-based (including in the workplace, community setting, at home)
- that accommodates family/personal responsibilities, work, and other training in terms of times and length of sessions/courses
- that is delivered when learners are available and can access tuition
- where the learning content is not solely defined (and constrained) by formal, accredited curriculum requirements, but responds to a learner's expressed needs and purposes, i.e. the communication tasks they need to achieve.

The flip side of 'flexible delivery' is 'flexible learning'. From a learner's perspective this means:

- learner choice, i.e. options around how, how much, when, where and what to learn
- where digital tuition/learning resources are involved, this means having access to equipment (laptops/tablets), data and digital skills training. Specialist equipment and learning resources to support learners with disability can be sourced in collaboration with NDIS and their case managers.

How should tuition delivery in the AMEP be structured?

All those eligible for the AMEP require opportunities to participate, for whatever length of time and through whatever medium they can, and not be disenfranchised due to disability, work, caring or other commitments.

The delivery of tuition in the AMEP should be structured and funded to optimise flexibility and choice for learners. Aspects of flexible delivery include:

- *Mix of delivery modes:* any mix of face-to-face, online, distance, App-delivered tuition that accommodates learners, their learning styles, preferences and availability. Delivery mode needs to accommodate learners' readiness and disposition to directing their own learning. Some cohorts (for example those with low/no LLND skills) will need more teacher direction until they gain skills and confidence.
- *Flexible delivery settings*: applied learning is often most effective where learners can observe and use language in real life communication contexts, such as at work and in the community
- *Flexible hours of attendance:* flexibility of course design and 'drop-in' opportunities within the AMEP that can accommodate irregular attendance (e.g. due to casual/seasonal work, caring responsibilities).
- *Flexible modes of attendance:* redefine 'attendance' to include variable forms of learner engagement, e.g. supported/directed by a teacher from the learner's home, at work, in community settings, independent study mode, online or via an App. Modes of attendance/engagement generally reflect the type of learning, for example hands-on applied learning activities would require physical attendance.
- *Co-design:* the structure of a learning program (content, where, how, how often and when) is best determined in collaboration with the learner/s and, where relevant, other stakeholders, such as employers or host community groups. Pathway guidance/IPG discussions can empower learners to structure their learning. This is particularly important for learners with special needs. In agribusiness work settings, for instance, employers have a say in how best to support their workers build their skills.
- *Competency vs curriculum:* focus of AMEP delivery should be to enable and assess learners to speak, read and write English to meet their practical settlement. AMES argues that the AMEP of the future should sit outside the VET sector and, therefore, not be tied to a national VET Training Package with its attendant formal assessment processes. The AMEP should be guided by an English as a Second Language (ESL) competency framework that uses agreed language progression measures that are practical and link meaningfully to a learner's life. Feedback from learners indicate that formal assessments are a disincentive for particular groups (e.g. traumatized clients, the elderly, those with low formal education) to attend AMEP because they cause anxiety or embarrassment for no perceived benefit to themselves.
- *Teacher/tutor options:* introducing flexibility to employ a mix of teachers, teacher-aides and/or tutors along with trained and supported volunteers can assist with managing the complex and multifaceted tasks to implement learner-led flexible learning programs.

AMEP in workplace settings

For AMEP delivery to be viable in work settings it needs to support and fund variable forms of tuition that conform with stringent demands of the workplace in terms of skills content, timing and resources available (including digital resources). Programs need to be negotiated with both employers and workers to ensure it meets the needs of both parties.

In the Wimmera Mallee, for instance, the general preference on farms is for a maximum of one hour of teaching time supported by anytime/anywhere learner access to DL/online/mobile resources. Where accommodation is provided for workers on large farms, for instance, employers are delighted with the availability of workbooks that mitigate the need for online connectivity. Whereas in a different work setting such as Melba Support Services aged care in Gippsland, access to practical work placement supported by web-based training modules, and the MyAMES learner platform combined to successfully deliver a workplace based AMEP.

AMEP in community settings

For the AMEP the community is the classroom and, reflecting this, the AMEP has been delivered in a variety of settings including libraries, schools, community venues and workplaces.

This mode of delivery is possible but not necessarily easy as it involves costs to cover a teacher working with small groups of clients; negotiating and funding the support and involvement of other local/community stakeholders; customised child care as/if required; insurance and legal considerations; transport to access community venue and/or excursions.

A tested example involved AMES, with the support of the City of Mildura Council delivering an AMEP class at a community venue to cater for women with young children who were not able, or not confident, to access regular mainstream child care.
Two child care educators from a local long day care providers attended and worked with the children while the women were engaged in English language learning contextualised to their daily lives, e.g. healthy routines and nutrition for their children; and built community connections though interacting with the other women.

How should tuition delivery in the AMEP be funded?

Measuring impact
The AMEP should implement an ESL competency framework that addresses the reasons migrants and refugees have for learning English. The framework should emphasise provision of practical learning and 'learning-in-context'. Measuring its impact should focus on the engagement of learners and their success in applying and using language in the context of their lives.

- *Language competency achievement:* language assessments should measure macro-skill progression within the ESL framework. Competency achievements should be based on a demonstration/evidence of what learners can do in the context of their goals and everyday lives in Australia. Such assessments will provide more meaningful and immediate feedback to learners than current measures focused solely on context-free unit/course completions.
- *Engagement and progression:* outcome measurement (aligned to accountability and funding) needs to shift from hours of attendance to learner engagement and progression along pathways to community, social and/or economic participation. Evidence of learner engagement may include online/App activity tracking, submission of workbooks, self-paced tasks and assessments, third party observations, journal entries.

Funding
In order to ensure the viability of learner-led and learner-responsive flexible delivery, funding will need to recognise and give full value to its many iterations. Providers will likewise need to re-conceptualise how best to deploy teaching and learning resources to meet flexibility demands.

- The funding model should include inputs that support engagement, for instance, recognising that the work a teacher does in the background to ensure learners are able to engage with online learning/assessments and work 'independently' in their own time is fully funded and not a discounted or un-resourced input.
- Funding needs to recognise and respect that the role of the teacher in managing flexible delivery becomes multifaceted and increasingly complex. Program requirements and funding need to reflect this complexity and not be tightly proscriptive about teachers' roles and/or in how 'teacher-led' activity is understood.
- *Applied learning* matches the way significant cohorts in the AMEP, particularly those with low levels of English and formal education, learn. Funding for these types of programs, whether in workplace or community settings, need to be part of the core payment model and not relegated as a discretionary fund component.
- *Volunteer tutors* are highly valued by learners and provide critical support for flexible learning. They are part of an organisation's workforce and require on-going management, support, training and professional development.
- Consideration should be given to the additional demands for enhanced technologies needed to support expanded forms of hybrid/online/distance learning delivery, mobile Apps, Learner Management Systems.

B: Teaching profession

6. How can the AMEP better support teachers to meet qualification requirements?

There are increasing teacher shortages across the education sector, especially in regional Australia. The specialist nature of qualified and experienced ESL teachers is included in this shortage.

Scholarships and incentives are strategies to support teachers to meet AMEP qualification requirements and include:

- providing scholarships for teachers to become qualified ESL teachers
- providing targeted scholarships for experienced overseas teachers who speak AMEP client First Languages but whose qualifications are not recognised in Australia
- incentives to teach in regional areas

The Teach Australia and Victoria's Teach Tomorrow approaches provide accelerated teacher training to graduates who then commence teaching in an educational setting, receive on-the-job training and become qualified at the same time. These programs could be adopted with a focus on attracting graduates to teach in the AMEP in regional areas.

A future AMEP could address teacher shortages by recognizing other professional roles additional to teachers, such as tutors, teacher-aides and trainers that provide support for small groups, First Language learners, learners with a disability, community-based learning and other flexible learning modes. Quality oversight could be maintained through mentoring, supervision and ongoing professional development provided by experienced ESL teachers.

7. How can the AMEP better support teachers to upskill and to remain in the profession?

AMEP should continue to provide external conferences and seminars, relevant courses, training programs and development opportunities that expand a teacher's abilities and minimise skill gaps. Focus should be on increasing their capacity to respond to rapidly shifting and dynamic needs of new and emerging cohorts, cohorts at risk, industry sectors and the broader community. Teachers can nominate to attend.

In addition, collaborative applied research projects are a practical means for generating insights into quality teaching. These projects embed professional development, improve institution culture and increase efficiency among teacher participants. Supporting time release to attend seminars and workshops regularly should be mainstreamed across AMEP providers, professional development time built into teachers' workload allocations; and attendance embedded in performance management practices.

The future AMEP can proactively support:
- teacher attendance at and teacher-led PD sessions
- opportunities for teachers to undertake action research which can be published
- scholarships or grants for teachers to develop/expand their digital skills

These opportunities not only encourage staff across providers to share good practice but also promote a shared commitment to quality across the entire AMEP.

C: Key Performance Indicators (KPIs)

KPIs play a key role in program governance and measuring program outcomes. KPIs also inform contract management and continuous improvement practices.

Final KPIs for inclusion in any request for tender documents will be determined based on final program settings, however the below high level KPIs are some suggested measures.

AMES agrees that final KPIs need to reflect final program settings of the AMEP of the Future. It has nevertheless provided comments regarding the KPI measurement statements in the table below based on its proposed flexible delivery model and its AMEP delivery experience.

Table 1.

Provider KPI	Measurement
KPI 1: Participation	percentage of clients who complete an Initial Assessment and commence in the program within six months. *Alternative KPI: percentage of clients who complete an Initial Assessment in the program within six months and initial engagement within one year* *Comment: Settlement issues e.g. housing, child care and necessity to work are delaying people from commencing in the program within 6 months of arrival. It is more realistic to expect initial engagement within one year.*
KPI 2: Language Progression	percentage of clients who receive at least one language outcome against the AMEP national curriculum in a semester. *Alternative KPI: percentage of clients who receive at least one language outcome against the AMEP agreed progression framework* *Comment: As a settlement program the AMEP should be guided by an ESL competency framework that uses agreed language progression measures rather than unit completions of a national curriculum.*
KPI 3: Retention	percentage of clients who remain in the program for 10 weeks or more. *Alternative KPI: percentage of clients who remain actively engaged in the program for 10 weeks or more. (see 'flexible modes of attendance' in Section A)* *Comment: Withdrawal reasons should be taken into consideration when analysing the retention rate. There should be a flexible arrangement for those clients who are affected by adverse circumstances e.g. allowing flexible delivery, flexible mode, flexible schedule.*
KPI 4: Pathway Guidance	percentage of clients who have a pathway guidance plan in place within the required timeframes *Comment: The detail and intensity of pathway guidance is variable for learners, increasing for those with a focus on employment, skills training or further study. A quality service should be fully funded to ensure it is not a tick-and-flick exercise; and there is learner engagement and evidence of understanding of the purpose and benefit of a documented pathway plan.*
KPI 5: Data Timeliness	percentage of reportable data, as set out in service provider instructions, that is submitted within the required timeframes *Comment: Ensure that reporting timelines align with relevant program milestones, e.g. the teaching and assessment cycle.*
KPI 6: Annual Audit	percentage of requirements that are met in the Department's annual audit of each provider *Comment: AMES queries the necessity of annual audits for*

Provider KPI	Measurement
	providers found to be fully compliant. Audits should focus on providers identified to have areas of non-compliance.
National Program KPI	**Measurement**
KPI 7: Client Satisfaction	percentage of surveyed clients who report they are satisfied with the program
	Comment: Client surveys are only useful if questions are in plain English and available in all client languages. First language support is essential for no/low literacy clients.

8. Do you think the proposed KPIs outlined in Table 1 are appropriate? If yes, why? If no, why not?

No. The KPIs as listed in Table 1 are premature as they reflect the previously proposed outcomes-based model. While providing some comments to the list above, AMES supports that, going forward, KPIs will be determined based on the final AMEP program settings.

In addition, it is important to note that any KPIs established once the final AMEP program settings are decided must reflect the core intention of the AMEP which it to assist new arrivals develop the English language skills they need to live their lives in Australia.

As a settlement program, any KPI established for the AMEP needs to be consistent with and support the overall outcomes of other settlement programs – this includes but is not limited to the HSP and SETS.

9. Do you think a client satisfaction KPI should be applied at the provider level? If yes, why? If no, why not?

This is only useful if the survey is in plain English and available in **all** client languages. First language support will be required for clients with no/low literacy.

10. Are there other KPIs that should be considered?

This needs to be determined once the final program is determined.

D: Child care

11. Child care in the AMEP is currently funded on an hourly basis. Do you have an alternative suggestion of how child care in the AMEP should be funded, that is cost and administratively efficient?

The current AMEP model of free child care does not align with the half-day or full-day rate provided by the mainstream child care sector. Issues identified in the Discussion Paper reflect the experiences of providers.

There is a gap between what service providers pay for child care and what they can recover through the Program.

Alternative examples for consideration: The 'Mums and Bubs' onsite model utilising informal child care arrangements similar to playgroups may be appropriate for some classes delivered in less formal community settings. The National Community Hubs Program model provides another example of what informal child-minding looks like in practice. The Hubs approach, where children can remain in the room, has introduced a more informal English language learning approach for women with low literacy who may not be comfortable to leave children in child care. Costs

associated with alternative models need to address safety considerations and be modelled on a realistic, equitable and sustainable basis.

12. Do you think clients should access AMEP related child care via the mainstream Child Care Subsidy (CCS) system? If yes, why? If no, why not?

Yes, where possible. The current system – where some AMEP clients use CCS and others do not - creates on-going confusion for parents/carers of children and child care providers alike. It would be clearer to all, and possibly more equitable, if everyone were to use the same system of accessing and paying for child care.

13. If CCS is applied, how do you think this should operate and how should the client co-payment be managed?

- New approaches to child care are needed to support client access to the AMEP, and to relieve providers of the cost burden. A way of continuing to provide this service could be as follows: Clients needing child care pay a minimal amount (this could be means tested)
- They are then eligible to claim the Child Care Subsidy
- The AMEP provides a 'gap payment'
- Providers are paid a fee to administer the service.

E: Information Management System

The Department is developing a new information management system to support future delivery of the AMEP. AMEP service providers have previously raised concerns about the administrative effort involved in entering duplicate data into the current AMEP information management system and their own student management systems (SMS). For example, AMEP service providers enter duplicate details of classes, learning activities and individual student attendance in both their SMS and the Department's current AMEP IT system. Recommendation 16 of the 2019 Evaluation of the AMEP New Business Model recommended that a model be implemented that reduces administrative burden.

14. To streamline data management in the future information management system, which option(s) would be preferred?

☒ an Application Programming Interface solution sending/receiving data between provider systems and the AMEP information management system in real time
☐ data download/upload into the AMEP information management system using pre-defined file download/upload processes, such as monthly uploads of all attendance and activity data
☐ data entry by AMEP provider staff into the new IT system using a web interface

Select all that apply

Why do you prefer these options?

The first option is preferable as it eliminates the onerous and costly need for double entry of data, plus possible time delays and transmission errors.

F: Complementing other government programs

15. How can the AMEP better link with other settlement programs?

16. How can the AMEP better link with the Skills for Education and Employment program and Workforce Australia?

17. How can the AMEP better link with other state and territory programs?

As noted above, the AMEP is part of the government's suite of settlement programs, and therefore any KPI established for the AMEP needs to be consistent with and support the overall outcomes of other settlement programs. It is critical that KPIs do not create unintended consequences in terms

of other settlement programs. For example: this could include situations where the KPIs of one program value certain outcomes, e.g. employment, while the KPIs of another program privilege retention in that program.

As noted in Section A above, the AMEP is a settlement pathway into other programs primarily for new arrivals. As a settlement program, its intention and history have been to support access to social and economic participation, of newly arrived migrants and refugees.

The AMEP works specifically with the other Settlement Services, i.e. the Humanitarian Settlement Program (HSP) and Settlement Engagement and Transition Support (SETS) programs to support the comprehensive settlement needs of their shared client cohorts of new and recent arrivals.

While acknowledging that eligibility for the AMEP has been extended through the removal of the time limits on the registration, commencement and completion of tuition for clients who were in Australia on or before 1 October 2020, the focus of the AMEP should continue to be the settlement of new/recent arrivals.

Migrants and refugees residing in Australia for longer periods may still benefit from English language tuition, and there are circumstances where people should be able to continue or commence the AMEP beyond the original 5-year eligibility criteria. However, this should not impact on the primary purpose of the AMEP of supporting settlement and providing pathways for new arrivals.

In the majority of cases the needs of longer-term migrants and refugees differ from those of new arrivals in that they are no longer in the settlement phase of their time in Australia – but may need assistance with other aspects of their lives – including improved English language literacy. There are other Australian and State government funded programs designed for cohorts resident in Australia for many years.

People who arrived in Australia as migrants and/or refugees should not be forever directed to/placed in settlement programs.
Mainstream foundation skills programs are intended for all Australians and should be accessible to people who arrived as migrants or refugees, and have been resident in Australia for longer periods.

Some of these other programs, which should offer the same level of support as the AMEP, for example volunteer tutors, pathway planning, assistance with caring responsibilities, include:
•   NDIS for people with disability
•   Workforce Australia for people needing language skills development to gain employment
•   Skills for Education and Employment (SEE) Program (noting that the SEE Program is only available to registered job seekers when it could benefit all Australians with language, literacy, numeracy and digital skills gaps.)

The re-alignment of the AMEP with the broader settlement service sector promotes integration and enhanced service support for clients in the undertaking of their wider settlement journeys and pathways. This position is not readily achieved through an alignment with a much narrower Vocational Education and Training context.

The AMEP should, however, facilitate the seamless transition into the accredited vocational training system by allowing learners who elect these pathways to concurrently enrol in VET units as electives while completing their language study. Many AMEP students who have left the AMEP with the intention of enrolling in a VET course find that they are unable to meet the entry requirements for these courses. Undertaking electives within the supportive AMEP environment will prepare them for the demands of the VET system.

G: Other Feedback

18. Is there anything else you would like to provide feedback on?

Supporting an agreed language competency progression framework vs an accredited (VET) curriculum

Positioning the AMEP in alignment with the adult Education ecosystem (contextualised for different States/Territories/regions) is required to support and inform client pathways based on their community engagement, educational and employment goals.

However, while aligning the AMEP within the broader education ecosystem, it is important to recognise that teaching and learning a new language is a discipline in its own right and is not the same as teaching/learning vocational skills or theoretical concepts. This is particularly relevant in the context of the recent AMEP eligibility changes and the potential conflict between providing a settlement program versus vocational training.

Quality and Compliance Framework

Mandating that a Registered Training Organisation (RTO) deliver the AMEP will ensure quality and compliance without the need to mandate a national accredited curriculum. There are existing models (such as Higher Education) that give responsibility to accredited providers/RTOs to design and approve courses through quality processes such as a Board of Study or Teaching and Learning Committee. Adapting these models would support outcomes that demonstrated rigour, relevance and appropriateness for each RTOs AMEP client cohort.

Respect for the integrity of providers will reduce compliance management for the Department. Providers (RTOs) selected through the Department's rigorous tender process should be trusted as sufficiently skilled and experienced to design and deliver specific programs to achieve language outcomes, with flexibility to adapt to changing client profiles and the external social and economic environment.