Reform of the AMEP Discussion Paper

AMES Australia AMEP Consortium response

9th July 2021

Background

AMES Australia and its AMEP Consortium Subcontractors welcome this opportunity to contribute to the discussion informing the reform of the Adult Migrant English Program (AMEP).

While no longer the major AMEP provider in Victoria, AMES has been continuously involved in delivery of the AMEP over the more than 70 years since the program was established and has a deep commitment to the program and the successful settlement of the migrants and refugees it supports.

AMES strongly supports the purpose of the AMEP as stated in the Discussion Paper – *'Through language tuition, the program seeks to advance social participation, economic wellbeing, independence, and personal wellbeing; all contributing to enabling the full participation of migrants in Australian life.'*

Considering the proposed AMEP Reform model in the context of this purpose statement AMES vision is for an AMEP that provides a framework to support a dynamic model which is driven by, and responds to, different individual and cohort needs, empowers communities to determine what works best for them and for groups of 'like individuals' within those communities. A cohort-based approach could, for example, provide formal, academic classroom-based tuition for clients with further study goals; offer community-based tuition in established community settings for clients wanting language-for-life skills; deliver employment-focused LLND combined with vocational units for those with employment aspirations and career goals; connect young people with activities and groups where they can gain LLND skills in real life contexts relevant to them; support LLND skill development in social enterprise/small business development contexts.

This response is founded on a set of core principles informing what the AMEP is best placed to deliver for its participants, to government and to the Australian community.

1. **The AMEP is a settlement program.**
    The AMEP is core to the successful settlement and ongoing inclusion of eligible migrants and humanitarian entrants. Realising settlement outcomes is often a protracted and non-linear experience. The AMEP is much more than English language training and progression through accredited units of competency and achievement of Foundation Skills certificates. English language is a tool to support social and economic participation – not an outcome per se. English facilitates a broad range of participation and activities, which together and/or separately, can constitute (settlement) outcomes for migrants and refugees. For the AMEP the community is the classroom and, reflecting this, in the past the AMEP has been delivered in a variety of settings which have include, for example, libraries, schools, community venues and workplaces. (*Ref: Appendix 1, Case Studies*)

2. **The client is at the centre of the AMEP.**
    The AMEP must be sufficiently flexible to meet the needs of diverse client cohorts eligible for and accessing the program. Understanding the breadth and depth of diversity within those cohorts is critical. New arrivals commencing their settlement journey arrive with vastly different backgrounds, capabilities, confidence, aspirations and goals. The extended timeframe and hours available in the AMEP will draw in more diverse cohorts – including refugees and migrants who have been in Australia for several to many years with the potential for barriers to be entrenched and confidence for acquiring English language and establishing goals at low levels. Their needs, goals and aspirations will be very different. The revised AMEP needs to cater for all. Learning English needs to be relatable to the lived experience and aspirations of each client.

3. **The AMEP is a service; the funding model must support effective delivery of this service.**
   The funding model needs to be responsive to AMEP design and not create barriers to flexible, relevant and targeted delivery. In effect the funding model drives the operational model and needs to be: sufficient, transparent and provide resources where the effort is greatest ie teaching and supporting client needs; reward evidence of quality teaching and learning to adult Foundation Skills cohorts; and seek measures of learner progress (that may be underpinned by accredited curriculum only when relevant) applied in a lived experience context. Within these parameters there is the potential for funding models beyond the traditional VET model to be considered.

4. **The AMEP must be aligned with the broader adult Education ecosystem.**
   Positioning the AMEP in alignment with the contemporary 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. 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 for conflicting and confusing information as to best fit choices for clients.

Discussion Paper response

The following presents a holistic approach in responding to the significant themes in the paper. Each theme commences with a context reflecting the position in the paper followed by AMES Australia's rationale and suggestions for consideration by the Department.
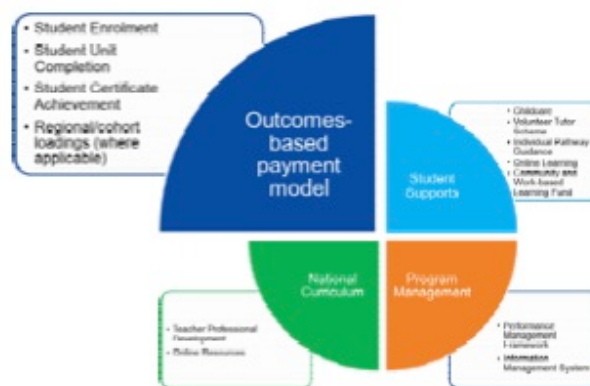
Outcomes Payment Model

Enrolment, Unit completion, Certificate achievement

The proposed reform of the AMEP model is focused on English language proficiency as the sole outcome of the program supported through a funding model designed to *'incentivis(e) service providers to deliver improved English language outcomes through the introduction of outcomes based payments based tied to student language skill/proficiency progression'*.

This *language skill/proficiency progression* is to be measured in terms of module completion (outputs) at EAL Certificate I and above and EAL Certificate achievement (outcomes).

AMES would suggest that, in not acknowledging and rewarding other social, vocational and/or employment outcomes, this approach:

- is in conflict with the stated purpose of the AMEP as primarily a settlement program that teaches English language as a tool to support the social and economic participation of migrants and refugees
- ties payment to outputs which may not reflect language or other skill progression – if those outputs are measured in terms of module/unit <u>completion</u>, rather than in terms of what a student is able to do in applying their English language skills
- fails to understand that for many of the target cohort completion of a unit of competency or attainment of an EAL Certificate is not necessarily highly prized. Acquiring English language and understanding of the Australian context for the purposes of making a new and a good life here for themselves and their families, are the incentives (eg being able to engage with the broader community; manage housing, health, family, schools; engage with training/education; secure employment)
- fails to respond to the complexity of the AMEP cohort, many of whom arrive with pre-Certificate levels of English and other complex life circumstances. Non-accredited curriculum may be most suitable for these learners

Cohort loadings

Cohort loadings need to acknowledge the complexity of the pre- and post-arrival experiences of migrants and, in particular, refugees and Humanitarian Entrants. While low levels of schooling can impact negatively on an individual's ability to learn a new language, there are other less measurable factors that have an equal or greater impact.

- People who resettle as refugees have been uprooted, not only from their physical home and environment, but also from their socio-cultural ecosystem.
- Many refugees are managing shock and trauma arising from their pre-migration experiences.
- Resettlement requires adults to integrate social and cultural knowledge and conditioning -which locals have acquired over decades - in a compressed period of time.
- Successful settlement is not just about the acquisition of obvious skills such as language and employability, but, critically, it depends on the degree to which an individual can integrate or at the very least navigate, the host country's complex social and cultural understanding and behaviours.

Assisting AMEP clients to manage these, and other challenges, so that they can concentrate on learning a new language, is an integral part of what providers do in delivering the AMEP service. It is important that the payment model acknowledges and supports this work.

The AMEP is a service; the payment model should reflect this.

The payment model needs to cover what it costs to deliver the service. This could be achieved through:

- a base rate payment to cover a minimum group of students that makes it viable for providers to deliver classes, with a second tier of payments for additional enrolments over the minimum number
- funding delivery of pre-Certificate I EAL and non-accredited curriculum to accommodate the AMEP client cohort (many low-level, non-academic learners, managing settlement needs and therefore in and out of the program, and are very different from the VET student cohort)
- recognition of social, vocational and/or employment outcomes in addition to EAL module completion
- loadings that recognise the complex barriers to learning English faced by many sub-groups within the broader AMEP cohort.
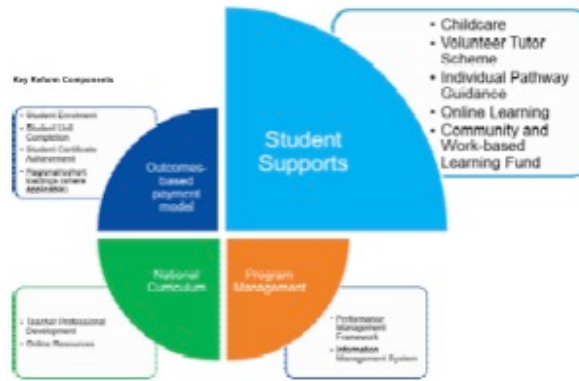
Student Supports

Childcare

AMES agrees that providing a childcare service is vital to enable parents and primary carers, particularly women, to attend classes, and that free childcare is beneficial for AMEP student learning and retention. And that the current AMEP model of free childcare does not align with the half-day or full-day rate provided by the mainstream childcare sector. Issues identified in the Discussion Paper reflect the experiences of providers.

- Some students are experiencing delays in accessing childcare and therefore AMEP tuition because of the difficulties involved in sourcing and negotiating affordable childcare.
- There is a gap between what service providers pay for childcare and what they can recover through the Program.
- Service providers are spending additional time (at their own cost) in trying to source childcare placements that fit within the hourly fee paid by the AMEP.
- In addition, as AMEP clients receive free childcare through their service provider they are currently unable to receive a childcare subsidy (CCS).

Cost to providers:

As free childcare is advertised as being available for AMEP students, students have the expectation that this will be available – and providers respond by attempting to honour this expectation. This means many providers are picking up the short-fall and incurring substantial costs to ensure that as many students as possible have access to childcare.

New approaches to childcare are needed to support student access to the AMEP, and to relieve providers of the cost burden.

A way of continuing to provide this service could be as follows:
- Students needing childcare pay a minimal amount (this could be means tested)
- They are then eligible to claim the Childcare Subsidy
- The AMEP provides a 'gap payment'
- Providers are paid a fee to administer the service.

The 'Mums and Bubs' onsite model may be appropriate in some classes delivered in less formal community settings. Costs associated with this model need to be modelled on a realistic, equitable and sustainable basis.

Volunteer Tutor Scheme (VTS)

AMES agrees that the VTS is highly valued by providers and students alike and is concerned that the new model which proposes the introduction of a payment to providers for the costs of recruiting, matching and training tutors will undermine this program.

- Volunteers are part of an organisation's workforce, require on-going management, support, training and professional development and are therefore the same cost to an organisation as other staff – with the exception of salary.

- Best practice is following the National Standards of Volunteering in Australia. This includes ensuring adequate training, ongoing support and resources for volunteers, providing coordination of matches, and having a dedicated coordinator to a set ratio of volunteers to manage the program and the people.
- If payment is limited to initial recruitment, training and matching and does not cover on-going support, there is potential for a very high turn-over of volunteers and ensuing additional costs to the provider.

The VTS should be resourced in a way that providers do not bear the cost of volunteer coordination and on-going support

The payment model needs to:

- recognise volunteers as part of the provider workforce, with the associated costs
- fund providers to manage and coordinate their volunteers through on-going and sustainable support. This could be through payment based on volunteer matches – a successfully applied option in the past - or other models that provide funding to manage and support the VTS.
- ensure volunteers are equipped to work with students through adequate training, resources and professional support ie as part of a team with AMEP teachers.

Individual Pathway Guidance

AMES supports a strengthening of pathway guidance in the AMEP while noting that:

- pathway guidance and personal issues/wellbeing counselling are two distinct and different areas and service providers should be funded accordingly if required to offer both services
- while the personal issues/wellbeing counselling role might be covered by the Humanitarian Settlement Program and SETS in the early stages of settlement, less than 30% of the current AMEP cohort are refugees or humanitarian entrants and therefore in a position to access these services. Further, the expansion of the program will likely attract many more clients not eligible for these other settlement programs.
- if the role is to be broadened beyond pathway guidance and if the Counsellor is expected to do more than provide a referral service (eg to organisations that provide specific supports – DV, mental health, etc) the position would require a formal counselling qualification.

The future AMEP business model needs to recognise the distinct roles involved in providing (i) pathway guidance and (ii) life/wellbeing counselling support.

- Payment should recognise the increased responsibility and time involved in life/wellbeing counselling and (i) consider two separate payments for pathway guidance and personal counselling and/or (ii) consider incorporating a loading for vulnerable cohorts in recognition of their complex, often unmet needs
- Consideration should be given to supporting professional development for AMEP teachers/staff engaged in both types of counselling.
- The proposed provision of up to six hours of enhanced pathway guidance should be 'bankable' so as to allow providers to target support and deliver increased support to those students most in need of either type of counselling.

Online Learning

While noting that face-to-face tuition may be most appropriate for many AMEP students – especially those with low levels of English and lower/limited learning strategies, AMES supports the move to introduce *'a range of flexible and innovative tuition options, to meet the needs of diverse cohorts; particularly women, people with caring responsibilities, refugees and young people'.*

Advantages include:

- Online teaching and learning allows providers, especially regional providers, greater coverage to reach more remote students
- Online learning accommodates students who cannot attend classes because of, for example, work, other study, caring responsibilities, distance, lack of transport, disability
- A mix of modes can be effective for many students

It is important to note that online learning may disadvantage some students including those:

- With low digital skills
- Lack of access to IT/digital resources (including data allowances)
- Having to manage, for example, small children, while engaging in online sessions.

In weighing the advantages and disadvantages, access and equity need to be considered. As does the best fit for the different client cohorts noted above, ie: women, people with caring responsibilities, refugees and young people – to which we would add – older people, those with limited resources/access to IT, people with disability.

Distance Learning

AMES supports the proposal that providers, where able, deliver their own Distance Learning programs. English language development has accommodated a shift to digital delivery strategies on an individual/group basis during COVID.

Advantages include:
- Students are comfortable with teachers that they know/are within their geographic region
- Teachers can customise online/DL resources to be locally/regionally appropriate
- Students have opportunities to join face-to-face groups/classes/excursions when they can

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The payment model for online and Distance Learning needs to reflect the true cost of delivery.

This means that the model recognises:

For providers
- teacher time for group and individual sessions
- resource development/customisation, and
- potential infrastructure required - initial set-up or on-going maintenance

For students
- support from Volunteer Tutor while engaged in DL
- access to childcare as per classroom based students.

Community and Work-Based Learning Fund (CWLF)

AMES supports the overall intent of the CWLF to provide:
- '*greater engagement with migrants with low English language skills in the community by offering (conversational) classes in familiar community settings*'
- '*a greater focus on improving client's employment related language skills and prospects in relation to gaining a position that meets local demand*'

Concerns with the CWLF model centre on:
- its placement in the Student Supports budget allocation (28% of budget to cover Childcare, Volunteer Tutor Scheme, Individual Pathway Counselling, Online Learning and the CWLF)
- our understanding that this will be a discretionary, grants-based fund and that providers will need to apply for one-off projects thereby limiting certainty and continuity
- the view that the CWLF (and the clients most suited to the program/s that this funding can support) sit outside the 'formal AMEP'
- the proposal that the Community Learning component will consist of 'conversation' classes
- lack of clarity as to how the Work-based Learning component - a pathway 'from the AMEP into local employment' – would work as a project outside the 'formal AMEP'.

The CWLF must be built into the AMEP and included as part of the core Payment Model, not as a discretionary fund component

To achieve greater engagement with eligible AMEP clients with low language skills, low confidence or other attributes/circumstances that discourage / do not support attendance in formal classroom learning, the model needs to include:

- Community Learning and Work-based Learning as built-in components of the AMEP delivery model, with opportunity for students to move in and out of what is, under the proposed model, the 'formal AMEP'

- cohort-driven and settings-based delivery options within the AMEP framework that respond to individual cohort needs and learning priorities
- delivery of non-accredited courses that respond to client needs, wants and availability, and not be limited to or exclusively 'conversation' classes in community settings
- funding options for the planning and delivery of long-term employment awareness/focused programs at low intensity (eg a barista course, one afternoon a week over several months) – especially where there are small student numbers to generate ongoing engagement with practical skills in context, with commensurate English language development
- flexibility in how non-RTO community organisations could be involved in the delivery with an AMEP provider
- incentives for provider/employer relationship development
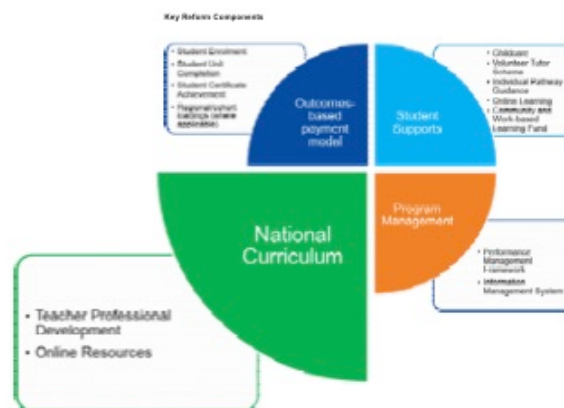
# A National Curriculum

A national curriculum

AMES supports the adoption of the EAL Framework as the national curriculum. This Framework caters for a broad range of refugee and migrant learners, acknowledging the impact of pre-migration experiences on learning. It offers flexibility with inbuilt elective choice to contextualise learning and address learners' needs and goals.

The AMEP Reform model proposes that the curriculum to be delivered in the AMEP commences at Certificate I level and includes the EAL Certificates above that level.

AMES concern is that the proposed model does not recognise the pre-Certificate level courses in the EAL Framework (Course in Initial EAL and Course in EAL) designed for students with low levels of language and literacy as well as little/limited exposure to formal education settings and/or digital engagement.

- As noted above – the AMEP cohort is diverse with a large percentage of learners entering with low levels of English language, literacy, numeracy and digital skills, and/or experience of or exposure to torture and trauma
- Assessments can dis-incentivise attendance: low-level learners who struggle with the demands of assessments are known to avoid attending when assessments are scheduled to take place
- Pre-accredited courses, with no compliance driven assessment required, place less pressure on low level learners, who are more relaxed and make better progress – as observed by teachers and self-reported by learners
- Being able to provide a mix of non-accredited/pre-accredited and accredited training can be effective – for example, using pre-accredited training (e.g. 2 or 3 days) to support accredited units (e.g. 1 day).

The curriculum structure for the AMEP Reform Model should include both pre-accredited programs and accredited courses from the EAL Framework.
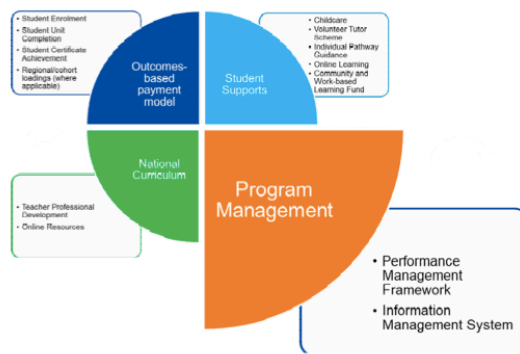
Performance Management

A new performance management framework

AMES view is that the **final version of the delivery model** which describes appropriate and valued outcomes for AMEP eligible migrants and refugees needs to inform the performance management framework.

- In the proposed model there is a danger that outcomes may be narrowly defined as achieving completion of English language units (outputs in the proposed model) or completing an EAL Certificate, and not take into account employment or social integration outcomes for clients.
- Recognition of employment and social outcomes needs to be included along with traditional curriculum-based outcomes when measuring AMEP performance.

A way forward

Importantly, it is the AMEP funding model, which will drive the operational delivery model, which will determine how performance is managed and measured. Getting the funding and delivery models right must be the starting point.

- To reiterate, the AMEP is a settlement program, not an education program in its own right. AMES would welcome the opportunity to work with the Department to explore different funding models and/or options, outside the traditional vocational education and training (VET) model. These could include, for example: the DFAT Australian NGO Cooperation Program (ANCP) funding model and successful international settlement/language programs (e.g. Canada). The various AMEP reviews undertaken in the recent past need to be reconsidered to triangulate recommendations with the extensive Discussion Paper feedback which will be received.
- Development of a funding model that provides great flexibility to adjust delivery to respond to (i) changing local needs and (ii) emerging cohorts is a critical underpinning for AMEP reform.
- A co-design process with other providers, practitioners, client community representatives and broader stakeholders – employers, community organisations, schools and other education providers, youth specific services - could achieve a viable, client cohort-driven, settings-responsive model with the flexibility to respond appropriately when different client cohorts need/are able to access the AMEP.

Appendix 1 | Case Studies

A COHORT-DRIVEN PROGRAM IN A COMMUNITY SETTING

MOTHERS MAKING A DIFFERENCE

The Werribee Cluster Engagement Leader for Catholic Education approached AMES on behalf of a group of mothers with children at schools in the cluster seeking language and literacy training.

Motivation

While the women were able to communicate quite well in English, their literacy skills made it very difficult for them to get work. They wanted to support their families better, assist their children more with their homework and improve their lives in their new country.

Community setting

The school has been very supportive in providing a room and making the women feel very welcome.

Shared responsibility

The women have taken responsibility for maintaining sufficient student numbers to retain their class - even picking up some women who were unable to get to the school.

Outcomes

With the assistance of their teacher they are slowly making progress towards their goals and having some fun along the way. They hope the program and their efforts can make a difference, with some of them gaining work and improving their lives in their adopted country.

CLASSROOM LEARNING APPLIED IN A COMMUNITY WORKPLACE CONTEXT

In a collaboration between AMES and Braybrook Community Hub, AMES Australia clients engaged in gardening and cooking activities at Braybrook Hub. The clients attend the AMEP and VTG English language programs at the Footscray centre.

Language, literacy and numeracy in context

Building confidence through sharing prior experience and knowledge

In the community gardens the head gardener shared extensive knowledge and skills on maintaining the veggie, herb and flowerbeds. All clients were happy, active and totally engaged with one another. Many were able to use their English language skills to share their wide knowledge of gardening or farming, activities left behind when they had to leave their home countries.

Language, literacy and numeracy skills: a practical application

Other clients put their numeracy, English language literacy and teamwork skills to use, to cook minestrone soup for everyone. This activity followed weeks of studying numeracy and the metric system as part of their program. Everyone sat together, gardeners and cooks, in the community gardens and talked about food, gardening and shared memories.

LLN IN A WORKPLACE SETTING – EMPLOYER & CLIENT DRIVEN

Dollar Curtains, an business with 80 staff at their curtains and blinds factories in Kilsyth, Maroondah in SE Melbourne, employed 65 workers from the Chin community (refugees from Burma).

Motivation

The employer, driven by both humanitarian reasons and business imperatives, was very keen to keep their Chin workforce. However there were a number of issues impacting on both the business and the Chin themselves. These included:

- the majority of the Chin employees had low levels of English resulting in regular mistakes with orders and measurements
- the employer wanted a better understanding of the Chin culture and cultural aspects that impacted on the workforce (e.g. why all were away for three days to attend a funeral)
- The Chin employees wanted to keep their jobs

Co-design with the employer

Dollar Curtains, the Chin Community, Maroondah City Council and AMES came together to plan a program to meet the employer's needs and assist the Chin to keep their jobs. The resulting program:

- had employer and employee commitment - Dollar Curtains provided one hour paid time release per week and the Chin stayed an additional hour after work
- was based on language directly related to the needs of Dollar Curtains e.g. colours, units of measurement related to orders for the following week/s
- was delivered by a team consisting of an AMEP teacher, an industry trainer from AMES Employment and several volunteers to support groups to work on different lessons/tasks
- combined AMEP funding (approx. 80% AMEP) and VTG state funding

Outcomes

- Dollar Curtains retained a reliable workforce and achieved reduced errors and wastage of materials
- The Chin had sustainable employment
- Dollar Curtains continued to recruit from the Chin community based on the work ethic of the Chin and this successful solution to improve productivity