Discussion Paper - Delivery of the Skills for Education and Employment (SEE) Program 2023

AMES Australia response

AMES Australia (AMES) welcomes the opportunity to provide input to the Department of Education, Skills and Employment (DESE) on proposed changes to the model, delivery and contractual arrangements for the Skills for Education and Employment (SEE) program. AMES has been a large provider of the program in Victoria for over 10 years, and has a 70 year history of delivering core, foundational English language training in Australia.

AMES response addresses many of DESE's questions directly in the second half of our response, while questions around participation and retention are addressed more broadly. To do this, we draw on the direct experience of delivering the SEE program as well as our work supporting migrants and refugees through initial settlement, education, social participation and employment services.

1. Addressing barriers to entry and retention

Barriers to entry and retention in SEE can be categorised broadly as either (1) influenced by program design or (2) structural (largely outside the influence of SEE program delivery and design). AMES views on the former are developed first, below.

1.1 Clear purpose

A critical element of successful engagement and retention in all education programs is whether **the participant believes there is purpose, quality and the likelihood of success**. This can be complicated in programs like SEE which teach core skills and are not directly linked to a specific employment pathway. DESE's paper supports this, identifying that adult participants learning core skills may lack confidence or struggle to see the benefit of participation – particularly if they are from a disadvantaged background. Acknowledging this, SEE can improve participation rates if:

- when communicating and marketing the program to participants, DESE and referral agencies can **clearly evidence the successes of the program** (in both qualitative and quantitative form – e.g. employment outcomes, social participation outcomes, positive experiences of classroom learning);
- teachers are supported to **focus on building the confidence of learners.** While assessment forms a part of the equation (in terms of understanding student achievement) over-assessment can harm confidence – and so a flexible, empowering and positive learning environment is just as essential. AMES believes many of the changes proposed by DESE can better enable this (e.g. more flexible learning options, reduced administrative burden).

1.2 Reliable referral pathways

The SEE program is unique amongst foundation skills programs in Australia in its reliance upon referral pathways. In the immediate context, AMES has observed high staff turnover at referring agencies since the beginning of the COVID-19 pandemic. This has impacted the relationships SEE providers maintain with local agencies. The disruption of normal referral pathways highlights the critical role of these referral agencies, and future disruption may be a significant barrier to entry for participants – particularly in light of the points made above around quality referral partners who can advocate for on behalf of the program**.**

These organisations have typically worked with SEE providers for many years and understand the program and how it can benefit their clients. Under the New Employment Services Model (NESM) many of AMES clients will be recipients of Enhanced Services (face to face) with new providers, and many will move to the self-service digital model. Both providers and online platforms will need SEE program referrals to be well integrated to maintain current participation rates. DESE anticipates *"the introduction of NESM will improve referral pathways to the SEE program, by allowing some job seekers to self-refer into SEE, if they identify LLND skills needs"*[1] – however this is only the case if, as noted above, job seekers perceive SEE to be a meaningful education program, and see that they can really improve LLND skills and succeed in a job.

1.3 Flexibility

Another key factor AMES believes would improve participation in SEE is to **build a flexible, empowering and contextualised learning environment**. The discussion paper touches on flexible training in relation to the flexibility for providers to determine appropriate courses and qualifications for their cohorts. This may understate the scope and importance of flexible training, which should accommodate the diverse needs of the SEE cohort: caring responsibilities, distinct and diverse LLND barriers, a variety of cultural preferences, barriers to transport access and sometimes limited availability. The flexibility necessitated during the COVID-19 pandemic, particularly around digital learning, demonstrates that providers are capable of working around changing circumstances. An example of how SEE could better accommodate job seeker need is around participation hours. These could be better tailored to job seekers dependent on their priorities. If equipped with more information, SEE assessors would have knowledge to place, for example, female jobseekers with female teachers.

AMES supports the provision of **non-accredited** training through the SEE program. As one of the largest provider of 'pre-accredited' training in Victoria, AMES sees the value of non-accredited training as for migrants, refugees and others lacking the confidence to enter more formal classroom environments. Commencement in non-accredited pre-training is often used by AMES to prepare participants to undertake formal LLND training and the use of digital platforms. In Victoria, the Adult Community and Further Education (ACFE) Board oversee pre-accredited training in the State, where curricula are developed, approved and structured using ACFE 'A-Frames'. The A-Frame approach may be one DESE would benefit from reviewing to understand the successful quality assurance approach used.

AMES has commenced non-accredited pre-training to our Skills First (Victorian) funded cohorts and would find it beneficial to adopt the same for our SEE cohorts. Criteria to access non-accredited training for participants could be assessed at the PTA as well as throughout course duration. In some cases, pre/non-accredited training can compliment EAL qualifications, and participants who are already engaged in SEE should not be precluded from access.

1.4 LLND embedded vocational training

AMES offers participants at Certificate III level and above a range of VET units. Similarly, participants in our *Certificate III Individual Support* and *Certificate III Early Childhood Education* are primarily of migrant background, and so **VET teachers are qualified language teachers** and embed in their courses a focus on a 'language of aged care' or a 'language of childcare'. This means a lot of emphasis is given to vocabulary and oral

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[1] *Ibid.*, page 8.

communication skills to meet industry needs/expectations. Students report feeling highly empowered and employment outcomes of both courses are above the state average, despite initial LLND barriers. Despite the success of AMES LLND-embedded VET courses, students would still benefit from more learning hours to help them achieve ACSF indicators.

While SEE could be used productively to fund courses like these, it would also be important to transition lower-level learners into occupation-specific/vocational learning at lower levels. As an AMEP provider, AMES would frequently use class excursions to workplace and community facilities to expose new arrivals to Australia to these contexts. Many in SEE would benefit similarly from a staged introduction of workplace-specific LLND learning.

1.5 Structural barriers to entry

Finally, AMES believes the program should acknowledge there are structural barriers to entry and retention in SEE – and that some of these are outside the direct influence of SEE– e.g. homelessness, entrenched welfare dependency, social stigma, mental health issues and more. The discussion paper notes that approximately 19% of commencing SEE participants disengage from SEE within 50 hours of training.[2] It would be wrong to assume the SEE program could not improve these figures, or contribute to addressing these issues - however acknowledging the structural factors that disproportionately affect the SEE cohort might allow for a longer term approach to how success is understood and planned for in the program. For example, small and large scale changes will not change perceptions of both employment services and SEE immediately. Changes will build trust in the program over time, and subsequently participation and retention will improve. The more SEE can establish itself as trusted within employment, social/health services networks – the more the program can begin to retain clients who are significantly disadvantaged.

2. Modes of delivery

As discussed, flexibility in SEE is a key influence in raising participation rates. In this context, a dedicated distance learning provider (procured independently of those providers who already deliver much of their teaching online) no longer has the same justification. The current model can limit the potential for single providers to respond to participants' increasingly changing needs. SEE participants are job seekers with diverse needs and commitments, and need to be able to weave in and out of majority online/distance learning. The need for face-to-face learning also changes over time, at different course levels and with the introduction of VET units. The current concept of mixed-mode delivery still requires 50% face-to-face learning, and it would be complicated and restrictive to re-introduce this as COVID restrictions are removed. While the discussion paper states an intent for face-to-face learning to remain the primary mode of delivery, AMES believes providers should be able to respond to individual job seeker circumstances and should have the discretion deliver online learning above 50% if appropriate.

Despite the need for a more flexible approach to distance learning, there is still a role to play for existing distance learning approaches for remote learners and certain other cohorts. DL providers have a suite of experience and tools that enable them to offer established quality training to clients residing in remote areas or because personal circumstances deter them from general training. Not all DL is explicitly digital (e.g. DL can be delivered with paper-based materials) and a move to a more flexible/integrated provider model should consider acknowledge significant digital access inequalities and not abandon traditional approaches

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[2] Discussion paper, page 9

to DL. Again, individual circumstances change quickly and it would be appropriate for SEE providers themselves to work with the individual and determine the best delivery modes for them, allowing for the delivery mode to also change over time.

3. Innovative projects

Project-based funding, such as the SEE Innovation Fund, encourages providers to develop innovative solutions to assist students who can be challenging to engage, and respond to real-world industry skill shortages. One way that it can do this is by aligning training to industry and community trends that can help to keep the program offerings relevant to target learner cohorts.

Under the current model, SEE does not deliver skill sets that provide a pathway to specific industries. While some VET courses are offered under SEE funding, for example Certificate III in Individual Support, this is limited. Project-based funding can therefore encourage providers to work closely with industry to offer SEE students an opportunity to access practical, contextualised training to obtain skills sets that match current industry demand, better preparing participants for employment. For example, new units and course materials can be developed using project funding.

Project-based funding can also extend the lifespan of resources or tools developed by SEE providers as they can continue to utilise the materials beyond the initial project timeframe. Findings around best practice are made available, encouraging collaboration amongst providers.

4. Qualified and skilled workforce

AMES views the discussion around teacher qualifications in the discussion paper as important, but of a lower priority in terms of addressing issues relating to learner progression/outcomes in comparison to others in the paper. There is a risk that introducing additional qualification requirements for teachers could be perceived as attributing these issues to teaching quality, and AMES strongly believes this is not the case. Furthermore, raising qualification requirements would conflict with the intent expressed in the paper (and advocated for by providers) to lighten administrative loads.

The SEE program prepares students to enter VET training and provides foundation skills for work. Teachers delivering foundation skills to SEE students using the EAL Framework or the CGEA already need to have TESOL qualifications, as this is mandated by the curriculum. Having the Certificate IV in Training and Assessment (TAE) is beneficial for TESOL teachers because they understand what students at lower AQF levels will encounter when they undertake VET qualifications.

However, training providers should be provided with more, not less, flexibility to configure delivery to meet the needs of participants and fully utilise a range of variously qualified teachers and trainers with critical quality teaching and learning oversight remaining with appropriately qualified teachers. A guiding principle underpinning any changes to qualification arrangements should be that they contribute to both student outcomes and provider sustainability. In practice this means learners can be exposed to a range of inspiring and relatable support (e.g. learner guides / trainers with industry currency) in a range of flexible learning environments, while overall learner progress remains overseen by a fully qualified teacher with TESOL qualifications.

5. Payment model

The proposed payment model in the discussion paper has the potential to increase administrative burden without careful co-design with providers and management of the transition between models.

Firstly, the concept of cohort loadings is a positive however there is a foreseeable added administrative cost in determining individual loadings. Furthermore, the discussion paper does not describe the nature of the additional support these cohorts will receive. In other examples of similar programs (e.g. AMEP) funding has contributed to additional roles such as pathways counsellors. These administrative and resource costs could be streamlined through close integration with NESM providers and linked data to avoid duplicating enrolment processes.[3]

Secondly, making the completion of units/certificates the basis of payments risks narrowing teaching and learning through overvaluing assessment and has historically led to the fast-tracking of students through assessments to their as well as to the funding-body's detriment. Therefore, the development of nuanced milestones that avoid this outcome will be essential.

Thirdly, a move to milestone based payments linked to curriculum outcomes seemingly stands in conflict to the commitment to retaining the ACSF as the progress measure, given the differences between ACSF and curriculum assessment. These differences are even more pronounced outside of EAL / CGEA, limiting the potential to map ACSF to curriculum outcomes (as proposed in the AMEP). As SEE moves towards funding for vocational courses, the administrative burden associated with these issues will need to be considered and accounted for in the payment model.

Finally, if the new model is to accommodate more flexible delivery options, this will require re-purposed and new course materials to best support training needs. During the pandemic AMES has invested considerable resourcing into materials / workbook / online development. AMES received a small amount of funding for some of this work in 2020, but overall this was undertaken at a loss to allow the program to keep running.

Overall, these costs could be accounted for through a monthly operating payment – which also works to guarantee provider stability through uncertain periods such as we have experienced over the past two years.

6. Program outcomes

The following section provides general commentary on the performance framework and program outcomes sections outlined in Chapter 5 of the discussion paper.

KPIs

The proposed KPIs are reasonable and link well to the program's purpose. Aspects of these KPIs may not be easy to align however. Specifically, based on current practice, the expectation is that a student should progress after certain the milestone hours - 200/400/600 hours. Providers identify an ACSF indicator to report progress to DESE, giving the valid perception of participant progress. However, students could potentially achieve all of their progressive assessment indicators (KPI 1) but never achieve a full qualification (KPI 3).

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[3] This principle should be extended across all aspects of student enrolment. Many job seekers in SEE have complex vulnerabilities and repeating personal information to service providers can impact trust, confidence and retention in unforeseen ways.

Providers would benefit from some clarity on this point as alignment between KPIs is important for incentivising good program outcomes.

Program outcomes

AMES believes many of the successful outcomes of the SEE program go unacknowledged as the assessment and reporting tools are necessarily quantitative, while much of the program's success can only be captured qualitatively.

Some strategies to better capture program outcomes are:

- greater acceptance of project-based assessment and real-life demonstration of skills (as opposed to structured summative assessment) to minimise assessment overload
- clustered delivery / assessment where one set of tasks could be aligned with more than one unit / ACSF indicator
- ability to claim multiple ACSF indicators at any point, provided there is enough evidence to justify the progression
- other, non-academic factors could be considered markers of student progress as they also work to enhance student engagement (for example, use of volunteers, excursions, social projects like 'community gardens'). Participation in these activities could contribute either to provider KPIs or, if appropriately designed- ACSF progression.

Ultimately, providers need to be encouraged and funded to focus on pragmatic skills (for example digital literacy, financial literacy) that enhance jobseeker confidence, employability, and quality of life.

7. Quality assurance

Overall, AMES believes the Quality Assurance (QA) approach taken in SEE is adequate, and the discussion paper does not appear to propose major changes in this regard. As DESE seeks to improve QA for the next SEE contract period, ensuring quality LLND delivery should remain the main priority. To aid this, AMES recommends DESE:

1. continues with the practice of annual file verification which provides evidence of accuracy of assessment in terms of the ACSF
2. considers the purpose of place of SEE QA audits which largely duplicate the role of ASQA and are not evidencing improvements to quality teaching (could DESE investigate acquiring ASQA audit data from either providers or ASQA themselves?)
3. remove the requirement to provide examples of content for delivery and assessment for one unit including activity mapping and teacher notes/lesson plans. This is very time consuming for providers and again, this is already an ASQA requirement
4. continue to enable the QA provider to manage and grow the SEE Assessment Bank (with assessment validation)
5. consider that the SEE Assessment Bank is going is going to overlap/merge with the AMEP Assessment Bank with the mandating of EAL Framework Curriculum for AMEP
6. review guidelines for best practice design and delivery in the SEE program to reduce regulatory duplications / overlaps. While useful for new SEE providers, the document is duplicating ASQA standards and ASQAs role
7. limit the involvement of QA provider(s) in resource development, as this is a discrete role separate to QA and requires a different skillset to QA.

The Professional Development (PD) aspect of QA is important but its inclusion in this discussion should not weight PD as equal to ensuring quality LLND delivery. AMES supports the continued funding of PD workshops for new and experienced SEE teachers and PTA Assessors. In particular, we suggest the following workshops for new SEE teachers and Assessors should happen every year:

- Introduction to the ACSF
- Introduction to the DLSF
- Introduction to conducting PTAs.

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