

## **ATESOL ACT RESPONSE TO THE AMEP REVIEW DISCUSSION PAPER**

In response to the *Review of the Adult Migrant English Program Discussion Paper: July 2008*, ATESOL ACT held a special meeting on Thursday 7 August 2008. The meeting was attended by 10 members, eight of whom were practising AMEP teachers or closely involved with the AMEP. A draft document based on notes taken from the meeting was circulated to all ATESOL ACT members for comment and amendment. This submission is the amended document. It has been forwarded to the Australian Council of TESOL Associations (ACTA), which is the peak body of TESOL professional associations in Australia, as a basis for their submission but is also this Association's response directly to DIAC.

ATESOL ACT welcomes the review and hopes that this submission from those closely involved in delivery of the AMEP is seen as a constructive contribution to the review process.

In summary, our members endorse:

- the statement that now “is an opportune time” to review existing AMEP provision and consider the program's future directions;
- the description of problems relating to changed client profiles, mixed ability classes, and continuous enrolment
- greater investment in AMEP counsellors;
- strengthening connections between AMEP providers and employment services;
- the use of bilingual support with low proficiency learners where feasible;
- increased options for youth;
- increased tuition hours;
- extending delivery settings and learning options;
- the principle that childcare should be located as close as possible to AMEP classes;
- improved promotion of the AMEP;
- a whole-of-government approach to adult ESL provision..

The main issues raised by our members are:

- inadequacies in the consultation process;
- the narrow statement of the AMEP's aims;
- the failure of the proposed client pathways, learner passports and interim classes to address the problems described in the discussion paper and their potential to worsen them;
- the lack of understanding of how different language skills relate to each other and should be taught;
- the lack of understanding of the role and potential of the CSWE;
- the lack of understanding of the role already played by AMEP counsellors,
- the lack of attention to what is entailed in using bilingual aides, increasing delivery settings and diversifying learning options;

- the lack of attention to the relationship between the AMEP and post-AMEP pathways;
- the failure to consider providers' problems in predicting childcare needs;
- insufficient attention to the Home Tutor Scheme and classroom volunteers, including eligibility requirements and funding;
- the lack of attention implications of proposed alternatives to the CSWE;
- apparent ignorance of AMEP experiences with and research into assessment and reporting;
- the lack of explanation of what is intended in the statement that "training ... is best provided by employers";

Overall, our members are disappointed by the inadequate understanding in the Discussion Paper of how the AMEP actually operates on the ground.

These points are elaborated below.

### **Consultation Process**

ATESOL ACT finds it difficult to understand how ACTA, the peak professional body of Australian TESOL practitioners, including AMEP teachers, was not considered among "key stakeholders" in the initial focus group stage, not formally notified of the Review or the discussion paper, and is not represented on the Review Steering Committee. Given this lack of communication, the association has found the timeline for submissions extremely difficult to meet and believes that the time for responses is too short for DIAC to claim adequate consultation with stakeholders. The effort involved in making this submission in such a short time can be seen as a reflection of our members' commitment to the AMEP and the importance they attach to having their views heard. However, the short time line for consultation and completion of the Review (September, 2008) does not appear to reflect a parallel commitment in policy-making for the AMEP.

Our members also believe that the data on which the discussion paper is based requires greater specification about numbers and characteristics of focus group participants. Statements to the effect that clients felt there was too much or too little emphasis on any particular aspect of the program are meaningless without an indication of numbers who agreed and disagreed, English and educational levels, experiences prior to arrival in Australia, gender, employment aspirations and length of time in the program. In our members' professional experience, these factors contribute to significant differences in clients' perceptions of their learning needs. Members also report that there was insufficient lead-time to ensure that sufficient numbers of clients attended focus groups, and that, to their knowledge, only a very small number who could not be called representative attended.

Members note with concern that other sources are ignored that should have informed the Discussion Paper, for example, research findings on key issues and proposals, including AMEP Research Centre reports and DIAC annual client satisfaction surveys. Knowledge of the AMEP's history and previous experiences appears totally lacking.

Members believe that key issues raised in the discussion paper require more concentrated attention than is possible through focus group meetings and the submission process. In particular, the connections between curriculum, assessment and reporting to different audiences (government, Centrelink, employers, other educational institutions and clients themselves) are more complex than can be discussed properly, much less solved, by any small and disparate gathering in a short meeting or by collating responses to the discussion paper. Attempts to resolve these issues go back to the 1970s in the AMEP (and TESOL more generally). In fact, the AMEP has supported and pioneered solutions that have been taken up in other countries. If further progress is to be made (rather than returning to former approaches), DIAC needs to bring together experts and experienced AMEP practitioners in a way that permits open, in-depth discussion and systematic consideration of previous experience, existing problems and possible solutions. Our members would be pleased to collaborate with DIAC to facilitate this kind of focused discussion as a basis for developing properly grounded proposals for the future. However, the Review completion date of September, 2008, would appear to rule out any such utilisation of this knowledge, expertise and experience, all of which has previously informed the AMEP.

A persistent theme at our meeting was that the discussion paper needed a better “reality check” about what already occurs and is feasible in AMEP Centres. This theme underpins much of what is stated below.

### **Aims of the AMEP**

Members endorse the aims of the AMEP set out on p. 8 of the discussion paper. However, they are concerned that the emphasis on employment, which they endorse, should not entail a narrowing of vision of the program’s overall aims and achievements. This section makes no explicit mention of the program’s social and citizenship goals.

Our members also seek recognition of their goal of providing newly arrived migrants with positive learning experiences and a safe learning environment, which is particularly important for those who have not been in classrooms for a long time, those who have come from difficult or traumatic situations, and those with little previous formal education. In reality, teaching in the AMEP is very much directed to building and enhancing clients’ confidence, self-esteem and capacity to adapt to life in Australia.

### **Client Profile**

Members endorse the statement that the client profile has changed considerably in the past 10 years or so. They observe that clients, especially humanitarian entrants, are currently experiencing greater financial pressures than previously. These pressures stem from the need to repay the loans they took out to pay for their fares to Australia, to finance family members to follow (often to escape quite desperate situations), and the curtailing of benefits such as housing and allowances that help support their attendance at ESL classes. Members believe that, along with the pressure from employment service providers (p. 14), these pressures help explain clients’ motivation to gain employment. That is, all other things being equal, clients would prefer to stay in the AMEP but the pressures are such that it is virtually impossible.

## **Creation of Client Pathways**

Members warmly endorse the goals of greater flexibility in AMEP provision, increased opportunities for clients with low proficiency levels to experience employment-related learning opportunities, and greater co-operation with employment services.

However, members are strongly of the view that the separation of clients into two pathways would simply replace a “one-size fits all” approach with two even more rigid “sizes”. That is, the proposal would create greater inflexibility, major administrative problems for no obvious gain, labelling and *de facto* streaming. In practice, it would be a return to the previous undesirable separation between “community” and other classes. Members advise that creating an “employment” stream would still not address the diversity of interests and learning needs that clients need for employment (ranging from unskilled work to commerce to trades and to professional work). At the same time, it would effectively label other clients—mostly women—as unemployable. It would also assist in creating just such an unemployable group.

The proposal also ignores the constraints AMEP centres face, especially smaller centres, in forming viable class groupings that take account of basic factors such as proficiency levels and previous education. The requirement to form classes in two streams would restrict the options for forming classes to meet client needs on a more flexible, term-by-term, intake-by-intake basis. It would reduce the scope for the more fine-grained focus that occurs with the modules and electives that centres already offer, including those related to employment, whenever numbers are sufficient. In smaller centres, forming classes in two streams would necessitate mixed level classes and aggravate existing complaints about this problem.

The proposal also seems to overlook the fact that English proficiency is itself an employability skill. So, for example, clients report to our members that they have failed job interviews and lost jobs because they could not be understood, that is, their pronunciation, or command of English grammar and vocabulary, or their basic literacy skills were inadequate.

The proposal also seems to imply that tuition for different English language skills should be separated in some kind of hard and fast way. Although different emphases are possible and desirable in courses, oracy and literacy skills are interdependent, and support each other over the language learning pathway. Moreover, they are required by the wider English-speaking society, no matter in what type of social interaction or employment. Members believe that it would be quite undesirable to attempt to mandate separate oral and literacy learning streams.

In short, our members are uniformly opposed to this proposal.

Members believe that it is possible, within the existing CSWE framework, to achieve the goals sought by this proposal. Where numbers permit, classes now can and do have different learning foci and allow options for faster and slower learning paces. Electives

and special modules are also offered. The CSWE already contains employment-related modules. Members believe that the flexibility within the CSWE should be supported and encouraged through:

- *broadening the scope of reporting on learner achievements*, both in relation to CSWE Learning Outcomes and other non-CSWE modules taken concurrently with the CSWE (see section on assessment and reporting);
- *on-going professional development* that supports and encourages teachers to use potential flexibilities within the CSWE;
- *teaching materials and resources* that support the above;
- *funding* that supports providers experimenting with *work placements alongside AMEP tuition* (for example, resources are required for searching out placements/liaison with Job Search providers, screening clients for placements, and on-going liaison to support clients and employers during work placements).

Members believe that the most urgent and unaddressed issue is not pathways within the AMEP but *the dearth of realistic pathways beyond the program* (see section on tuition hours below).

### **Learner Passports**

Members believe that potential exists for more systematic documentation of learner achievements within the AMEP. However, the current proposal to achieve this goal is flawed for the following reasons.

Firstly, it not clear what individualised learner passports would achieve. If the aim is to facilitate communication between AMEP providers and Centrelink, this communication already occurs via the ARMS data-base, and is more accurate and reliable than any individualised documentation could be—in our members’ experience, sizeable numbers of clients have difficulty in managing their existing documentation, including that already provided by AMEP centres.

Secondly, members believe that some clients would, on the basis of their previous experience of official documentation, be overwhelmed and even afraid of anything labelled as an official “passport”, much less something as detailed as the proposal envisages.

Thirdly, in members’ experience, many clients find the current focus on precisely defining personal goals culturally alien, mystifying and intrusive. Clients’ goals, as they commonly state them, are “to learn English,” find a place to live and food to eat, and often “to get a job”. Alternatively, they may be unrealistic, given the person’s English level and previous education—for example, what is to be recorded if someone says they want to be an engineer but have only two years previous schooling?

Fourthly, members believe that the process envisaged for the passports would formalise counselling in a way that deflects from actually understanding and meeting client needs as they present them and as they develop over time. In practice, passports would become

a pointless and inflexible bureaucratic burden for both clients and providers. The hours available for counselling are already inadequate to meet client needs.

The proposal is, basically, unworkable. The passports would get lost, the information in them could not be guaranteed to be accurate or up-to-date, they would create unnecessary rigidities, and would be an administrative nightmare.

If individual documentation of client achievements on course is to be improved and systematised, the aim and audiences for this documentation must be considered more carefully. Any proposal should *alleviate* administrative burdens rather than create more. More careful consultation with providers is required.

### **AMEP Counsellors**

Our members would welcome a greater investment in AMEP counsellors. Independent of the proposed learner passports, counsellors already undertake the duties described in this section. Fulfilling these duties, plus other demands arising from clients' everyday needs, cannot be met by existing resources for counselling.

### **Strengthening Connections between AMEP and Government Employment Services**

Our members warmly endorse strengthening these connections. They believe that a productive starting point would be joint local discussions and improved training sessions, some also jointly. They would welcome information about, and models of, successful collaboration from around Australia.

Our members caution that their role is as teachers, counsellors and managers in programs directed to English language learning for initial settlement. Developing the expertise (envisaged on p. 15) to assess prior learning and overseas qualifications, provide quality advice on post-AMEP pathways, and effectively facilitate clients' access to these pathways, would take them well beyond this role. They believe that the requisite expertise is best developed within government employment services and other specialised agencies, with whom members would be pleased to work closely. They advise that current counselling for AMEP clients by these agencies requires greater expertise than is generally available about requirements and opportunities for unskilled employment, apprenticeships, the trades and the professions.

### **Continuous Enrolment**

Members agree that continuous enrolment is a major source of difficulty for clients and teachers. It is aggravated by the pressure on teachers to assess and report on CSWE Learning Outcomes, especially towards the end of term.

Members are strongly of the view that flexibility is needed in dealing with continuous enrolment and that, in practice, the interim classes recommended in the discussion paper, are sometimes but not always a solution. For example, interim classes work when English levels in the class are not too disparate. They can be preferable later in a term for students with minimal or no English proficiency, but not for those who can be placed at an

appropriate level. Further, some teachers are more comfortable with continuous enrolment than others.

Members recommend that AMEP centres should be left to deal with continuous enrolment on a flexible basis. They would welcome professional development on strategies to meet this challenge.

Dr Lynda Yates's research on continuous enrolment in the AMEP Research Centre is commended to DIAC. This research canvassed these issues in some depth.

### **Bilingual Support**

Members generally endorse the use of bilingual aides (and bilingual teachers), especially in pre-CSWE and CSWE1 classes. The main constraints on using aides are:

1. a lack of suitable people who speak the required languages;
2. the multiplicity of languages spoken by students in the one class (limits exist on the number of aides that can reasonably function in one room);
3. budgets that do not allow employment of the required number of aides;
4. potential friction when some clients are supported by aides but others are not.

Members also point out that aides need professional training. They need to understand the teaching methodologies used in AMEP classes, to know when to translate and when to desist in order to promote the student's learning, and to have reasonable English proficiency. Members endorse the Victorian State Government model described in the discussion paper.

### **Youth Options**

Members warmly endorse the discussion paper's call for better options for refugee youth, especially those with little previous schooling. In addition to the concerns described in the discussion paper, members report that it is particularly distressing when they have to turn away young people who have spent more than three months in an Intensive Language Centre but have subsequently dropped out.

Members agree that the AMEP can be inappropriate for 15-18 year olds where age-appropriate classes are not feasible. They believe that a separate "whole of government" initiative is needed for this group and that scope exists for AMEP providers to cooperate with schools and the TAFE sector to develop age- and educationally appropriate options. Given that one of the Review's terms of reference is provision for this group, the discussion paper has surprisingly little to say on this topic.

### **Increased Allocation of Hours**

Members warmly endorse the statement in the discussion paper that the current tuition hours are insufficient for most clients in the AMEP to gain even basic English proficiency.

Members point out that this issue cannot be discussed separately from the role of the AMEP. If the AMEP is to stay focused as a settlement program, with goals described above, it follows that AMEP tuition cannot be open-ended, even for the most deserving or needy clients.

Members believe that entitlements could be doubled for those at lower levels without deflecting from the AMEP's settlement goals. However, the pressures on clients to gain employment that have already been noted may mean that many would not use extra hours.

Members believe that, if the AMEP is to remain directed to assisting settlement, the main issue at stake in this discussion is ensuring stable, quality *post*-AMEP ESL provision. This provision should include a diversity of options, for example, for clients to return to ESL classes when they realise further tuition needs, provision for low and high English proficiency levels and to meet different social, educational and employment needs. By this, we do not mean that ESL programs should not be linked to other educational, training and employment programs but rather that ESL provision should not be managed as some kind of off-shoot of adult literacy or labour market preparation.

Members are firmly of the view that the AMEP should remain under DIAC management. It follows that developing stable, quality post-AMEP provision requires long-term commitment, improved support and an explicit focus on ESL from DEEWR and much closer cooperation between DIAC and DEEWR to ensure smooth transitions for clients and coherence in how adult ESL provision is managed and funded (including child care provision—see below).

Members commend the “whole-of-government approach” described on p. 7 of the discussion paper. They recommend that a permanent cross-departmental working party be established to achieve the above goals, and that this working party be supported by an outside advisory committee of adult ESL providers and other experts in adult ESL.

### **Increased Delivery Settings**

Our members endorse the proposal for increased delivery of classes in workplace settings. They advise that such classes are, however, not as cost effective as in other venues and also require considerable co-operation from employers in regard to:

- providing suitable rooms and equipment;
- class times (does the proposal imply time release for workers?).

### **Childcare**

Members warmly endorse the statement that childcare is an important feature of AMEP provision. They support the principle that childcare to be as close as possible to AMEP classes, preferably on site.

They also point out that the requirement that a provider's childcare budget be specified in their tender is unrealistic—providers have no way of predicting what childcare will be needed over the length of their contracts, nor of predicting rises in childcare costs. If the

AMEP's commitment to supporting childcare is to be a reality, funding for childcare must depend on actual demand.

### **Home Tutors and Classroom Volunteers**

Members noted the absence of explicit consideration of the Home Tutor Scheme, except in regard to childcare issues. They point out that this scheme is a unique and effective component of the AMEP. Its highly personalised approach integrates targeted language support, cultural information and the goals of social inclusion and building community linkages. Volunteer tutors are also significant mentors in their students' search for employment and/or further study, often through their own networks.

Members are opposed to any mandating of the number of home tutor visits, which would run counter to a principle fundamental to the scheme, viz. promoting volunteer and learner autonomy.

The effectiveness of the Home Tutor Scheme relies on the professionalism of AMEP providers in volunteer management, recruitment, training, and providing ongoing support from trained teachers. Members believe that this aspect of the scheme is under-funded.

Members reported that the use of volunteers in AMEP classrooms followed research (prior to competitive tendering) which found clients felt that they lacked opportunities to practise casual conversation with proficient English speakers. With increased numbers of very low proficiency clients with minimal/no literacy, teachers began to use volunteers to support those struggling in lessons. Using volunteers to provide conversation and to support low proficiency clients is very effective from both educational and budgetary perspectives. Nevertheless, resources are required for recruiting, training and professional development (e.g. seminars, newsletters, social functions) and general administration.

Members reported that arrangements supporting classroom volunteers and Home Tutors are overly complex and inhibit flexible responses to client needs. In the light of the discussion paper's proposals for diverse learning opportunities, and the positive role played by Home Tutors and classroom volunteers, members recommend that DIAC consult with providers on funding and eligibility requirements with a view to maximising and streamlining volunteer support. Along these lines, they recommend that access to Home Tutors be extended to include clients receiving more than 6 hours tuition who request a tutor and are supported by their teacher. Sufficient constraints already exist—notably available volunteers, support materials, training costs—to prevent a major financial blow-out. Within these constraints, providers would (and should) give priority to those receiving less than six hours tuition, SPP and Prep students. Members did not anticipate a huge demand due to the pressures on clients already described, but they believe that where people seek to maximize their access to different learning opportunities, particularly when the Home Tutor Scheme is so cost effective, they should be encouraged.

## **Effective Learning**

Members warmly endorse the call for clients to access diverse learning options. However, members point out that ILC hours are no longer funded and that providers are not funded to develop on-line, audio and DVD learning materials.

Although teachers largely prefer not to use a set textbook, members would be pleased if a book allowance were available to permit individual clients to purchase course books, dictionaries and grammar books.

## **Promoting the AMEP**

Members welcome the suggestions made in the discussion paper.

## **Changes to the Curriculum**

Members are strongly of the view that the development of the CSWE was a major advance in adult ESL provision in Australia. They wish to underline the statement in the discussion paper that the consistency it permits for assessment and reporting and its alignment with the Australian Quality Training Framework are extremely important (p. 25).

Members are therefore puzzled by the seeming inconsistency in the proposal that a non-CSWE curriculum be introduced for some learners. This move would essentially disconnect these learners from the learning pathway that the CSWE provides. It would entail either deflecting resources from improving the CSWE or, more likely, condemn these clients to second-rate and *ad hoc* teaching materials.

As stated earlier, members believe that perceived inflexibilities in the CSWE are best dealt with by exploiting its potential for flexibility:

- developing teaching resources within the CSWE framework to meet specific needs;
- professional development.

The question of assessing core skills is addressed in the next section.

## **Reporting Arrangements**

Members endorse the proposal that reporting should allow for the assessment of clients' achievements in non-CSWE electives and modules. These should be accredited within the CSWE framework.

Members point out that, without good teaching materials and adequate, on-going professional development for teachers, the pressure to report on learner achievement against CSWE Learning Outcomes can lead to a restricted interpretation of the CSWE framework.

Members point out that the reasons why existing reporting does not always reflect client progress is closely linked to what can actually be achieved within 510 tuition hours. As the discussion paper states, this entitlement is not based on benchmarks for English language learning but was derived by averaging client hours in the AMEP (p. 22). Remedying this problem would require research into possible English language gains by different learner types within specified time frames.

Our members are of the strong view that this section of the discussion paper does not reflect the complexities of what has been learned—practically, theoretically and through research—in the AMEP since it began. For example, it ignores the different audiences for assessment and reporting, the different purposes of assessment (formative and summative), the different foci for assessment (a generalised notion of English proficiency versus achievements in a particular program), the infrastructure that has been developed around current reporting on the AMEP (notably the ARMS data-base), and the important policy implications its proposals imply (notably, how DIAC reports to government on outcomes from the AMEP). In short, this section indicates a profound ignorance of the AMEP, its history, the professional field on which the program relies, and the policy context in which it operates.

As already indicated, our members propose that the issues raised in this section, and the issue of assessing and reporting on core skills, require a focused, informed, open and specialist discussion that brings together AMEP managers, teachers, assessment experts and government officials responsible for this program. Such a discussion should be sufficiently extended to allow for properly grounded proposals to be developed.

### **Professional Development**

Members endorse the specific suggestions for professional development (PD) in the discussion paper (p. 26). The consistently high standard of PD in the AMEP since the early 1980s underpins its excellence.

Members are puzzled by the statement that “training for teaching English as a second language is best provided by the industry”. If under-cutting existing qualification requirements is meant, we are absolutely opposed to this move. Members believe that AMEP teachers should have, at minimum, a first degree and recognised teaching qualifications that include specialist ESL. These base qualifications should be delivered by tertiary institutions and be completely independent of employers.

Our members also note that supervised teaching practice in the AMEP is now impossible. While members accept that practice teaching should be carefully monitored and should not detract from clients’ learning experiences, teachers recruited to the AMEP now have no quality experience in teaching adult migrants. Gaining this experience is simply deferred and, worse, occurs without the guidance and supervision possible in teacher education programs. The pool of prospective teachers is also restricted since, having gained their experience elsewhere, new teachers do not look to the AMEP for employment.

Additional non-award-bearing PD should be the responsibility of employers and the AMEP Research Centre, supported by a PD funding allocation.

Members greatly appreciate the PD offered by the AMEP Research Centre and believe it should continue. The Centre ensures a high level of professionalism in PD offerings, access to local and international developments, and coherence and direction in the PD program. However, members also want more scope for locally initiated PD. Currently, if they wish to use local sources of expertise or have specific needs they want addressed, they must fund these from non-PD sources. They therefore recommend that a portion of overall PD funding be allocated directly to providers.

Members also greatly value opportunities provided by the AMEP Research Centre for participation and mentorship in practically oriented action research projects. Some members comment that reports on the one project in its various stages can be unduly repetitive from one AMEP conference to the next. Members would welcome opportunities to learn about a greater variety of research, including more cutting edge and scholarly investigations relevant to their field, at both the AMEP Annual Conference and other professional conferences. Members do not understand why there is no AMEP conference this year and believe that annual conferences are essential.

Members wonder whether the approach to professional development signalled in the discussion paper is another step to support the increasing casualisation of the AMEP teacher workforce, the pressure on salaries caused by competitive contracting and the lack of promotion pathways within the AMEP. They recommend that the next round of tender specifications ensure that teachers meet recognised ESL qualification standards, that a reasonable balance exists between contract and casual teachers, and that teachers are remunerated at comparable levels with other members of the teaching profession.

## **Conclusion**

Overall, our members believe that the discussion paper identifies some key problems but, with the exception of extending tuition hours, its proposals do not address these problems. Rather, these proposals are generally unrealistic, would recreate key problems that the AMEP has faced and overcome, deflect attention from underlying issues, and reflect the poor consultation that has occurred so far. For these reasons, we are deeply concerned about the proposed completion date for the Review. We wonder if the effort we have put into formulating this submission will be wasted.

Nevertheless, we hope that this submission is seen as providing a constructive—if critical—analysis of the proposed future directions for the AMEP, offering DIAC the opportunity to benefit from our members' grass-roots experience and deep commitment to the AMEP.

15 August, 2008.