



## **Response to *Creating a More Flexible LLNP in 2013-16***

**August 17, 2012**

### **About Us**

Adult Learning Australia is the peak body for Adult and Community Education in Australia with members in each state and territory. Our membership includes providers of adult literacy education ranging from non-formal community based volunteer literacy programs through to large not for profit RTO's who deliver high volumes of accredited literacy curriculum including the LLNP.

### **General Principles and Long Term Vision**

The right to literacy and numeracy is an inherent part of the right to an education. ALA's members value the Commonwealth's focus on adult LLN through the LLNP program. Our members report that learners value the opportunity to take part in the LLNP.

ALA's public position is that all Australians, regardless of their employment status, should be supported to develop their language, literacy and numeracy skills as a right of citizenship. We also believe that Australians need higher levels of literacy for a range of reasons and purposes including managing their finances, parenting literate children, being active citizens in a healthy democracy, maintaining individual health and wellbeing throughout the adult years leading to active and productive aging.

There is a strong body of research to suggest that literacy is developed through social participation rather than as a prerequisite to it. We also know that low levels of literacy are intergenerational and linked with poverty. Therefore, we would like to see the Commonwealth engaged in a redesigned signature literacy program that is more practical and purposeful, more locally determined and which addresses both child and adult literacy in a holistic way.

We would also like to see the development of a Commonwealth Indigenous adult literacy program that takes into account Indigenous ways of knowing and Indigenous literacies. Both Australian and International research tells us that "both ways" education that builds on Indigenous identity, produces the strongest outcomes.

There is a tension within the imperatives of Job Services Australia program and the LLNP; between the desire to get people into the workplace quickly and the desire to provide them with essential literacy and numeracy skills to increase the chances of them succeeding in work.. We would like the see the LLNP extended and made more flexible so that participants in the LLNP can more easily continue their LLN studies

when they enter work, particularly where this work is short term or casual. We know that nearly 60% of casual workers did not participate in formal learning in the last year and of these a further 1/3 didn't take part in non-formal workplace training. (Australian Workforce and Productivity Agency, 2012, p 59.)

## **Multi- Provider Service Options**

Many states are currently going through various stages of increased marketization of their VET systems. In Victoria competition has increased dramatically and administrative and compliance systems have struggled to keep up. Other states are embarking on this process. We would not like to see a multi-provider system introduced in this environment except where it is absolutely essential to meeting increased demand.

Learner choice is important, however, until the interface between the LLNP and the JSA program is improved, increasing competition between providers in the one Business Services Area won't deliver learner choice but will be an additional burden on providers.

Our members report that they struggle to build relationships with and secure referrals from JSAs into the LLNP program for a number of reasons including:

- a) The LLNP alone doesn't provide an accredited VET outcome and JSA's performance measures require clients to achieve accredited outcomes. Where LLNP providers combine LLNP with an accredited state based curriculum in order to meet JSA requirements, this effectively doubles the reporting and paperwork of the LLNP alone;
- b) The LLNP takes a long time compared to short accredited courses in some fields. JSA's are often unwilling to provide clients with the time to take part in the LLNP;
- c) JSA's often have an RTO arm delivering VET programs and therefore a financial incentive to refer learners to this RTO arm rather than to an external RTO offering the LLNP;
- d) JSA's have high levels of staff turnover requiring providers to continually re-engage with new staff in order to keep referrals going into the LLNP.

We don't accept the premise of the paper that increased competition will automatically improve learner choice in the current environment.

Some of our members report that they struggle to form appropriate groups of specific learners under current service arrangements, for example, ESB learners at the same literacy levels. There is a substantial body of research to suggest that the methodologies appropriate for second language learners are significantly different to those appropriate for adults from an English speaking background with low levels of literacy, usually due to disrupted or negative experiences of schooling. Increasing competition in BSA's would only encourage placement into inappropriate classes.

## Response to Questions

Within the context of the discussion paper we offer the following comments. We have confined our responses to those questions that are relevant to all of our members and as a result have left many questions blank.

### **1. What do you consider to be a reasonable period of time to rectify any performance issues before another provider on the panel is called on to commence LLNP service delivery?**

The bigger question for ALA is what constitutes poor performance in the context of language, literacy and numeracy programs.

Although challenging, we would like to see mechanisms for the learner voice to be paramount in assessments of the performance of LLNP providers. Our members report that the LLNP program compared to other adult and further education programs funded by jurisdictions and the Commonwealth has a high level of scrutiny but that this scrutiny is largely of administrative processes rather than the experience of learners.

Literacy is one of the social determinants of good health and good health is one of the determinants of successful labour market participation. We would like to see assessment processes that take into account the interrelationship between literacy, health, social welfare, and progress in the labour market. For example if learners report that their newly acquired skills assist them to find and retain accommodation, build their confidence, make positive social connections we would like to see these things considered as part of an assessment of quality provision.

We believe that this would give a better picture of providers who provide good quality programs but struggle to deal with the administrative burdens of the LLNP and those who are simply not delivering. We also believe that a shift in the volume and focus of assessment would allow this to occur with no additional cost.

As each case will be different we would like to see removal of contracts dealt with on a case-by-case basis with the interests of the participating learners taking precedence over other considerations. We also think that balance needs to be provided between given the integration of the LLNP with accredited curriculum, that the

### **2. What do you consider to be a reasonable timeframe to commence LLNP service delivery if you are called on from the panel?**

ALA would like to see learners in new programs as quickly as possible. However, we would like to see this negotiated on a case by case basis taking into account factors such as geographic locality.

### **3. Do you consider the current LLNP qualification requirements to be too rigid? Why / why not?**

ALA does not consider the current LLNP qualification requirements to be too rigid.

The ABS stats about the volume of adults with insufficient literacy and numeracy skills to operate effectively in a modern workforce and society are well known. There are many ways that this large cohort of adults will develop their literacy skills: through informal and non-formal learning in the workplace, the community, through civic participation, through social enterprise and through standard VET programs. ALA recognizes that a range of qualifications are appropriate to support adults to develop their literacy skills in these diverse environments.

However, the LLNP is a formal adult literacy program targeted at a very small subset of the population with low literacy skills. These are learners who have identified a need and desire for structured support. Each of their journeys to unemployment and low skills is unique and complex. Such a program requires teachers with high skills and high-level qualifications.

It is worth noting that those countries which have the highest levels of adult literacy and numeracy (Germany and the Scandinavian countries according to the 1996 IALS) are trending towards higher level professional skills and qualifications for teachers to deliver formal adult and vocational education qualifications. These are coupled with non-formal community based and workplace based programs that require lesser or different qualifications.

If shortages in the LLN field exist, the answer to these skills shortages is the same as in all fields: more training and better pay and conditions to entice those in adjacent fields to move across. If providers were able to tender at a rate that doesn't allow for them to attract qualified staff then this should be looked at in the context of a review of the original tendering arrangements.

The opportunities afforded by the NBN, as outlined in the discussion paper, will provide new opportunities for real time video link ups and high quality distance delivery. This should be of assistance in overcoming skills shortages in rural and remote areas.

The need for staff with different skill sets, for example, youth specialists, or Indigenous education specialists could be dealt with through team teaching or other creative approaches.

**4. If so, what do you think the LLNP qualification requirements should be?**

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**5. What impact do you think the removal of specific CT and / or AVOC will have on the outcomes to the program and quality of service delivery.**

Our members report a low success rate in attracting AVOC programs and have reported that the time required to gain approval for a CT program is too long to be responsive to learner needs.

Unemployed adults with low levels of literacy are by definition disadvantaged. We believe that all providers delivering the LLNP should have experience in working with

adults with complex needs, which would make the need for a separate set of administrative requirements for CT redundant.

## **6. What would you consider to be a balanced approach regarding work experience placements?**

We agree with three of the four recommendations in the paper regarding work experience:

- Removing the requirement for departmental approval for work experience;
- Allowing the LLNP provider to claim work experience hours if the placement has been identified by another party (i.e. a referring agency or the host organisation themselves);
- Clarifying LLNP providers' obligations with regards to insurance liabilities and specifying an amount in the 2013-16 Contract.

Regarding the remaining recommendation:

- Monitoring of work experience by the provider to be based on a risk assessment undertaken by the Departmental Contract Manager;

Work experience is a key part of developing language and literacy appropriate to Australian workplaces. Best practice would see the LLNP incorporating learner's workplace experiences into their classroom learning and vice versa. We would like to see a minimum amount of workplace visits incorporated into new LLNP contracts.

We would also like to see work done to improve the interface between the LLNP program and social enterprises, perhaps through the Social Enterprise Investment Fund, recognizing the important role that social enterprises play in providing supported work for adults with low skills.

## **7. What would be the impact to removing the requirement for departmental approval for work experience and observation?**

Removing approval processes for work placement would allow service providers to be more responsive. However, if approvals are changed to a "risk" basis, these risks should include potential abuses of free labour and potentially unsafe work placements.

Some strategies to assist in this process might include:

- A register of employers who have previously been approved for placement;
- An initial employer assessment process to identify whether a provider can support workplace, roles, responsibilities, skills practice and safety.
- A public statement committing to quality training signed by employers wanting to be recognized for their success in the area.

**8. What would assist you to make work experience placements a part of your Standard Training?**

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**9. Do you think that extending the period in which to complete a PTA will assist in retaining clients? Why / why not?**

Yes – the PTA involves a lot of language in one hit for second language learners.

**10. What factors / triggers should be used to determine a job seekers suitability for training?**

A desire to improve their language, literacy and numeracy.

Literacy and access to training, particularly in a community context, enables adults to overcome the factors that are currently used to deny them access to the LLNP, such as poor physical and mental health.

*Dropping off the edge: The distribution of disadvantage in Australia* by Professor Tony Vinson for Jesuit Social Services and Catholic Social Services Australia (2007) highlights the particularly strong link between intergenerational poverty and low educational attainment and recommends a coordinated approach with education at its heart.

**11. What do you consider, in the event 200 hour blocks are to be removed, to be sufficient assessment points (for example, every 200 hours, 400) for clients progressing in the program and why?**

As discussed on page 2, most of our members combine the LLNP with an accredited state based curriculum in order to provide learners with a recognized outcome and to enable referrals from JSA's. As a result learners are being assessed against the Australian Core Skills Framework and being assessed a second time at different points for their accredited curriculum. This has created a Kafkaesque level of assessment that would not be tolerated in the school or higher education sectors. It is the adult equivalent of a NAPLAN every 5 to 10 weeks.

The obvious answer is for the LLNP to identify which accredited curriculum correlates with its requirements and to allow assessment to be against the accredited curriculum. This would mean that learners are assessed at appropriate points in the curriculum cycle.

**12. How could the NBN be used to improve LLN delivery?**

ALA was one of three educational bodies to appear before the 2011 House of Representatives Inquiry into the Potential Uses of the NBN. Our advice to this Inquiry was that the NBN has enormous potential to improve the quality of online learning, as faster bandwidth and ubiquity are the two ingredients to activating programs that mimic face to face interaction, such as real time video conferencing.

As stated earlier, literacy is essentially a practical social practice. We concur with the Commonwealth that face to face is best. However, the NBN will allow the use of tools that come very close to face to face delivery. Rather than replacing face to face delivery, we would like to see the NBN replacing low quality online learning which can be characterized as heavily text based with low levels of interaction with others.

The NBN should also allow for higher levels of technology enhanced learning within the face to face classroom, such as through the development of multi-media products and tools of communication.

### **13. What are the pros and cons to changing LLNP geographic boundaries to align with ESA boundaries?**

ALA supports the changing of LLNP geographic boundaries to align with ESA boundaries.

#### **Other Issues:**

The LLNP compares poorly with uncapped places in state based LLN qualifications, (as is the case in Victoria) as the latter have one set of requirements and the former have two for the reason outlined above on page 2. If other jurisdictions roll out uncapped places in LLN programs then the relationship between the LLNP and state based LLN programs will need to be rethought.

#### **Summary of Recommendations:**

1. In the longer term, develop a Commonwealth literacy program that is more practical and purposeful, more locally determined and which addresses both child and adult literacy in a holistic way.
2. Develop a “both ways” Indigenous literacy program.
3. Allow participants to complete the LLNP following them gaining work, especially if this work is part time or casual.
4. Only move to a multi-service provider model where it is essential to meeting demand.
5. Remove barriers to JSA’s referring clients to the LLNP.
6. Include the “learner voice” in evaluation of provider “quality”.
7. Include other benefits of literacy to learners besides progress against the ACSF in evaluation of provider “quality”.
8. Keep the current qualification requirements.

9. Ensure that all providers of the LLNP are experienced in delivering programs to disadvantaged adults.
10. Include a minimum amount of workplace visits in new LLNP contracts and accept the discussion paper's other recommendations regarding work experience.
11. Improve the interface between the LLNP and Social Enterprises.
12. Accept the paper's recommendation to extend the period of time to complete a PTA.
13. Remove any pre-requisites for disadvantaged learners to gain placement in the LLNP and adapt delivery and assessment arrangements to meet their needs.
14. Identify accredited literacy curricula to be delivered under the LLNP and match milestones and payments to these.