

# Response to the Proposed Reforms of the Adult Migrant English Program (AMEP)

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ALA welcomes the opportunity to provide a submission in response to the AMEP Reforms discussion paper. In drawing together this collated submission response, ALA has consulted with members that currently provide AMEP, liaised with the Adult and Community Education Victoria (ACEVic)<sup>1</sup> and other AMEP community providers.

## **ABOUT ADULT LEARNING AUSTRALIA**

Adult Learning Australia (ALA) has been in operation for more than 61 years and is the largest national peak body for adult community education in Australia. ALA exists to provide leadership and professional development that advances quality services for all adult learners.

ALA is a not-for-profit entity with both organisational and individual members in all states and territories who reflect the diversity of adult and community education (ACE), including community learning centres, community colleges, neighbourhood houses, TAFEs, Aboriginal training and skills organisations and other adult education institutions. ALA is a trusted long-term leader in the field of adult learning and community education.

We believe in the power and potential of adult learning and community education to transform lives and to affect both social and economic change. ALA values and promotes the benefits of learning in all of its forms, and is an active advocate in state, territory, national and international communities.

Adult Learning Australia manages the annual rollout of Adult Learners Week (ALW) 1 – 8 September each year. In 2019, the ALW launch included marking and celebrating the 70<sup>th</sup> anniversary of the Adult Migrant English Program (AMEP) at TAFE Southport, Queensland.

## **CONTEXT**

The Australian Government supports the delivery of free accredited foundation skills to targeted cohorts through the *Adult Migrant English Program (AMEP)*, *Skills for Education and Employment (SEE)* program and the *Foundation Skills for Your Future (FSYF)* program. By

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<sup>11</sup> Peak policy, advocacy and information body for the Adult Community Education (ACE) sector, representing Victoria's Learn Local Organisations

qualification, the largest courses are Certificate I and II in Spoken and Written English, (underpinned by delivery through the AMEP).

The AMEP is one of the longest-standing settlement services, offering free English language tuition to eligible migrants and humanitarian entrants to improve their English language skills and settle into Australia. It celebrated 70 years of delivery in 2019.

In August 2020, the Australian Government announced major legislative reforms to the AMEP that came into effect on 19 April 2021. This means that more migrants can now access free English language classes through the AMEP for longer and until they reach a higher level of proficiency. This is the first part of the Government's three-part plan to make English language tuition more accessible, ensure better quality outcomes and encourage greater participation. Reforms to the current AMEP business model have now been designed to complete this plan.

The Department of Home Affairs (DHA) has invited public feedback on [the proposed reforms to the AMEP business model](#) through a [discussion paper](#), survey questions and consultation forums by 9 July 2021.

## **INTRODUCTION**

AMEP learners face many barriers to access, continue and complete English language programs. The potential barriers include low levels of awareness around training opportunities, low levels of understanding of the benefits of training, logistical challenges in being able to attend training, and a lack of flexibility in training (especially in the digital environment). AMEP learners have complex issues and often face multiple barriers to participation.

Some learners who come from a nation in conflict may also suffer from trauma or have disabilities that require adjustments and support in the classroom setting. Female migrants/refugee learners can also encounter difficulties in entering and engaging with training given cultural ideas around women's education. Some learners don't finish for many reasons – they may obtain work, their Job Active tells them to do something else, or there may be major family issues or ongoing trauma.

Vulnerable learners need the supportive, flexible and learning environments that adult and community education (ACE) providers can offer. They are not for profit organisations, working closely with local communities and networks to provide supportive environments for learners from disadvantaged backgrounds to become successful learners. Consistent with adult learning principles, we know that adults learn best when they are motivated, self-directed, and autonomous learners, reaching their goals within attainable timeframes and creating their own learning pathways.

There is significant concern within the community sector that (DHA) is not fully aware of the extent of the excellent work that community providers play in delivering AMEP. Community providers hold reservations about the proposed outcomes-based model for units of competency and qualification completions. The uncertainty in terms of planning may not be financially viable, vulnerable learners requiring extra support and care may not be addressed.

More financial details are required to enable community providers to ascertain the viability of any proposed reforms in terms of the sustainability of their organisations. ALA has compiled a range of community provider views to inform our response to DHA.

## **SUMMARY RESPONSE**

### **Outcomes Based Model**

1. **An outcome payment on the attainment of certificate levels is not the most effective way to incentivise student outcomes.** The community sector holds significant concerns about the proposed outcomes-based model for units of competency and qualification completions. The discussion paper states that ‘payments on outputs are common in the Vocational Education and Training (VET) sector’. However, there is no evidence of outcome-based payments for publicly funded VET.

An outcome payment for the attainment of Certificate levels does not take into account the complexity of language learning or the characteristics of the AMEP learner including those with a range of barriers to learning who are likely to go in and out of the program. It will also cause significant cash flow problems for providers and could result in a range of consequences so that cash-flow will put extreme pressure on agencies to get a unit result as soon as possible. The reduced income over time will adversely affect the community providers’ ability to maintain teaching and support staff payments, affecting student success and program sustainability. The proposed model threatens both providers’ viability and teachers’ employment.

Consequences could include reduction in settlement material covered, to focus on units; teaching to the test to ensure unit completion’ inappropriate placement of clients to achieve Certificate payment; student dissatisfaction at being kept in a certificate class to complete the certificate, when moving to a higher level class would be more appropriate.

Payments linked to assessing students will undermine quality assurance, limit accessibility and discourage participation in the AMEP. Alternative models should be investigated as proposed in the interim statement by the Australian Council of TESOL Associations (ACTA).

2. **If the outcomes payment is adopted then those with lower levels of education who find it difficult to achieve certificate outcomes would need to be one cohort adjustment group.** Other measures must also be considered for cohort adjustment payments including

Visa class, non-roman script, years of schooling, age, intensity of study, settlement and health issues, family environment and commitments (large families, single parents, etc.)

3. **An outcome payment is not the most suitable point to apply a cohort adjustment.** The outcomes based model is fraught with complexity that impacts payments. It will take a long time to achieve outcome payments for these learners at a unit level and impossible at a certificate level unless 22482VIC Course in Initial EAL and 22483VIC Course in EAL are recognised for payment. An adjusted payment at commencement would assist in funding delivery for these learners. There are also concerns that should a learner have multiple providers at different times – there will be issues in terms of adjustment payments.
4. **The split of payments do not reflect an understanding of the delivery of the EAL Frameworks.** Under this model, it would be inadequate to cover costs incurred by the provider and cash flow would be insufficient over the term/semester.
5. **Splitting payments under the outcomes model provided is not relevant to AMEP.** The model provided is a pre-apprenticeship course and different to AMEP. AMEP and Foundation Skills takes all eligible clients, including those with a range of barriers to learning who are likely to go in and out of the program based on personal circumstances. It is not a good fit for AMEP which aims to achieve multilayered engagement with diverse learners whose backgrounds of educational attainment, immigration and asylum- refugee experience is complex.

### **New information Management System**

6. **The new information system is welcomed but it must integrate with SMS programs.** In general, community providers welcome a new IMS system as the current ARMS system is no longer fit-for-purpose and needs updating. However, any new system must avoid double handling of data. The new IMS must ensure that it does not increase the level of administration without adequate funding, that it includes measures that make it more streamlined and provide support and training for staff.
7. **Transitioning to a new system brings risks that must be planned for and managed.** Previous attempts at new information systems have caused complications. It would require informed design and application to ensure an appropriate system that does not increase administrative burdens on providers as it has in the past. Training on the new system for successful tenderers of the AMEP would be essential before and during the start of a contract.

### **Distance Learning**

8. **A range of tuition options should be available that focus on learner needs and preferences.** A mixed mode tuition model will best support flexible learning. A combination of F2F and online or workbook components would be very useful for coping

with clients varied requirements. An online only option for working clients would be useful where students find it difficult to get to physical classes.

Virtual space/learning online provided by the Department to support students learning is expensive for providers to fund and create individually. With one curriculum across the country, the materials could be developed for use by all.

Students must have equipment/data/skills to do online learning, and this can be difficult financially. Students may have other family members who also need access to shared devices or have limited or no access to a quiet place for learning.

9. **Service providers have had experience delivering to clients during COVID lockdowns and could continue to provide tuition flexibility to meet the needs of current Distance Learning clients.** Distance Learning was delivered by service providers in some previous AMEP contracts. Distance learning materials need to be kept up to date and accessible to providers. However, the management of distance learning would require extra resources to ensure they are up to date, adapted and reviewed.
10. **Learners need to have the devices and skills to successfully engage online.** Learners will need to be competent in using digital devices and some digital literacy skills plus access to telecommunications and provision of adequate data. DHA should consider an Australia wide platform to ensure quality delivery and equity of clients who are learning remotely are met.

### **Community and work-based learning fund**

11. **Community based learning should be flexible enough to meet learner need.** More information is required about this grant-based model not only about the funding but also about the administration of the program so that community providers can give informed feedback.

Community based learning should not only focus on casual conversation classes. It should take into consideration clients' needs. For example, clients who need reading and writing skills but come with high oracy (speaking and listening), also clients who need to improve digital literacy skills. Some examples of community based classes are classes for mothers - it should not be assumed that the mothers do not have ambitions for further study or employment.

To ensure that AMEP community based learning has enough flexibility, community based classes should have a different funding model to allow for small class sizes - it should not be funded based on the number of clients, hours delivered & outcomes.

There is some concern if the community program is opened to all community groups that unscrupulous organisations or individuals may seek to profit from the program, as has occurred as a result of previous VET funding reforms. To reduce this risk, AMEP-

contracted providers could be incentivised to develop partnership/subcontractor arrangements with well-regarded and robust community groups.

Some ACE providers feel strongly that all English language programs, including conversational classes, should be delivered by qualified English language educators to ensure quality teaching and a high standard of learner outcomes.

12. **Community classes should have the choice of appropriate curriculum either accredited or non-accredited to meet the needs of the class group.** Learners enrolled in community based classes should have the opportunity to enrol in units of competency of accredited certificates. However, non-accredited delivery should not be of lower quality and should require qualified teachers.
13. **Best practice in determining labour markets includes building and strengthening relationships across sectors.** Employers, learners and Jobactive working together to identify gaps and opportunities in the market can be used to inform courses, make them more relevant and contribute towards best practice. Some members suggested that it may be worth investigating the development of a Labour Market Portal.

#### **Introduction of a national curriculum**

14. **Professional development plus access to teaching and assessment resources will help AMEP teachers ensure a smooth transition to the national curriculum.** Some members argue that the two curriculums that have been used in the delivery of AMEP share similar contents and subject features and should both be offered. They believe limiting the curriculum to one makes AMEP less flexible and places unnecessary demands on providers who may have to include the second curriculum on their scope.
15. **Professional development on teaching and learning platforms would assist AMEP teachers to take full advantage of any online learning modes.** This should be fully resourced as part of training in consultation with providers and the quality assurance organisation.
16. **Any new learning resources or platforms should ensure equitable access to learning resources across Australia for the AMEP.** Digital literacy skills, access to digital devices and the internet are important factors for AMEP learners to access online information. Ensuring digital inclusion and appropriate pathways should be key considerations in the reforms. There are several user friendly applications of which Zoom is one. Multiple applications such as Facetime and WhatsApp have been used successfully with adult learners who have a smartphone or appropriate digital devices. Supplementary communications include texting, emails, phone calls are also useful. The Digital Literacy ACSF Framework provides some tasks/activities suggestions that could be utilised in digital and online resources.

## **Strengthened student counselling and pathway guidance**

17. **The expansion of student counselling and pathway guidance is welcomed.** They are important areas that deserve recognition and adequate funding. Best practice in the provision of student counselling and pathway guidance would involve a minimum yearly budget to support employing staff for these roles. The budget could be adjusted if the program grows.
18. **The number of hours of pathway guidance a student needs varies.** Some need more and others need less. Certain points in the client journey should be mandated for a meeting. A previous contract was based on 6 hours per client during their time in the AMEP however, that was when the hours were limited to 510.
19. **Monthly payments for pathway guidance should be provided and commence at the point of enrolment when the pathway guidance has started.** Program explanation, clarification, the importance of tuition options and attendance, and the planning of sequential stages of learning employment and community engagement should all be considered.

## **Changes to the Volunteer Tutor Scheme**

20. **Best practice in tutor training and support would include mixed mode - online and face to face options.** Some members believe there may also be a case for considering integration of community-based learning into the Volunteer Tutor Scheme.
21. **Other changes to the Volunteer Tutor Scheme the Department should consider** include costs related to ongoing support and rematching. The proposed model with a payment for the costs of recruiting, matching and training tutors is seen as positive by members.
22. **Childcare is hard to manage successfully.** Childcare has been a very valuable component of the AMEP system for many years. However, there are major concerns that the proposed outcomes system payments are linked to curriculum achievement and childcare. Some members believe that childcare funding should not be included in the contract tendering system and that there should be a fixed cost for this linked to current market rates in each state plus a fixed administrative fee. Some members also argue that allocating a budget for child care clients would not work as it is hard to predict how many AMEP clients would need child care. Their lives are complex, they are vulnerable and often more mobile due to housing, needing employment and other issues.

If AMEP continues as ‘everyone is eligible and entitled to “free” childcare’ – it would be very hard to explain to clients why some are placed, and some cannot be placed. For example, questions would arise as to what happens if you run out of budget in the middle of the quarter? Do you waitlist clients or send them away with no reason except that there is no budget to place their children at childcare and to pay for it?

Prioritising clients based on their visa category would be unfair as visa categories vary considerably across contact regions. In some regions, all humanitarian clients would receive childcare whilst in other regions due to the number on that visa only a small percentage would receive childcare and none on another kind of visa.

It is acknowledged that small providers would find it hard to manage childcare unless they have it on site.

23. **It is not clear what is meant by ‘informal childcare’.** Crèches and ‘mums and bubs’ classes, for example, can be useful as a transition arrangement to develop students’ confidence but the numbers in class are often small, making it an expensive class to run. Many clients who are parents are anxious to learn, want to do full time classes and want to study without interruptions. Clients in these classes cannot go on excursions or do Settlement Language Pathways to Employment as they must be in the same building as their child. Quality approved and accredited child care should be provided in all settings, including community venues, to ensure that health and safety and duty of care are not compromised.

#### **A new performance management framework**

24. **The new performance management system should be delayed until the payments system can be resolved.** More consultation should be undertaken on this issue once the future payments system is determined so that the best performance system can be achieved that provides accurate, timely and supported reporting.
25. **Quality service delivery in AMEP looks like it is sufficiently resourced** so that the service can maximise access, participation and outcomes, and not place providers in a position of unreasonable financial risk.
26. **The Department should ensure that any new system has quality control measures that are clear and supported, and that monitoring is manageable.** The system should ensure data integrity and timely reporting accountability.
27. **Provider performance should be reported on the system and include rationalisations and clarifications** for exceeding expectations based on the funding model, or not meeting them.

#### **Other feedback**

ALA members working with Indigenous communities have indicated that Aboriginal and Torres Strait Islander (ATSI) adults who don’t speak English as their first language should be offered AMEP. ATSI elders have raised issues of equal access and are seeking parity with new arrivals and CALD communities for access to free English language classes in the community.

## **IN CLOSING**

The current socio-economic environment and the impact of COVID, is placing ongoing fiscal and operational pressure on not for profit organisations. While some aspects of the proposed reforms are welcomed, there are major concerns about the proposed outcomes based model. Under this model, the financial impost on AMEP providers means that if students don't finish for any number of reasons – the provider won't receive payments for the hours they have actually done.

The proposed DHA model discourages providers from supporting the most vulnerable and disadvantaged learners who might need additional support and time to complete units and qualifications. There is a real possibility that community providers will withdraw from offering AMEP or that the system will be compromised as providers try to pass students whether or not they have achieved the standard so that students can exit through AMEP, and organisations can get paid. To manage cash flow, outcome-based delivery encourages providers to complete learners in units of competency in the shortest possible timeframe, regardless of best practice in teaching and learning and in contrast to student-centered learning approaches which meet the individual needs of learners.

ALA recommends that 1. DHA undertake more detailed consultations with community providers to ensure the outcomes model does not further burden their ability to offer support to complex and disadvantaged learners and 2. Investigate alternative models and ensure that any new model of reform is developed in consultation with community providers to enable best outcomes for all.

## **RESOURCES AND CONSULTATIONS**

Adult and Community Education Victoria (ACEVic): <https://www.acevic.org.au/>

Australian Council of Tesal Associations (ACTA) interim statement: <https://tesol.org.au/>

Carringbush Adult Education: [www.carringbush.org.au](http://www.carringbush.org.au)

Learning for Employment (Djerriwarrh) : [www.djerriwarrh.org.au](http://www.djerriwarrh.org.au)

Laverton Community Integrated Services Inc. T/A Laverton Community Education Centre: <http://www.lcis.org.au/courses/>

North Melbourne Language and Learning Centre: <http://www.nmll.org.au/>

Mountain District Learning Centre: [www.mdlc.com.au](http://www.mdlc.com.au)

Yarraville Community Centre: <https://www.ycc.net.au/>

Other ALA members