



Evaluation of the Adult Migrant English Program New Business Model

FOR THE DEPARTMENT OF HOME AFFAIRS

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Acknowledgements

We acknowledge the traditional Aboriginal owners of country throughout Australia and pay our respect to them, their culture and their Elders past, present and future. Whilst this project extended across all of Australia, the bulk of this report was created on Kulin and Ngannawal Nations country.

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Disclaimer

The opinions, comments and/or analysis expressed in this document are those of the authors and do not necessarily represent the views of the Department of Education and Training or the Department of Home Affairs

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Acronyms

ACSF	Australian Core Skills Framework
ACTA	Australian Council of TESOL Associations
AIMA	Australian Institute of Multicultural Affairs
AMEP	Adult Migrant English Program
AMES	Adult Migrant English/Education Service (now operating as AMES Australia)
ARF	AMEP Reporting Facility
ARMS	AMEP Reporting and Management System
ASQA	Australian Skills Quality Authority
ATB	Assessment Task Bank
CCS	Child Care Subsidy
CEP	Certificates in English Proficiency
CSWE	Certificates in Spoken and Written English
CSL	Core Skills for Learning
DL	Distance Learning
DSS	Department of Social Services
EAL	English as an Additional Language
ESL	English as a Second Language
HSP	Humanitarian Settlement Program
IELTS	International English Language Testing System
IMS	Information Management System
IPF	Innovative Projects funding
IPG	Individual Pathway Guidance
ISLPR	International Second Language Proficiency Ratings
KPI	Key Performance Indicator
LLN	Language Literacy and Numeracy
LWA	Linda Wyse and Associates
MPM	Multi-provider model
NBM	New Business Model
NWG	National Working Group
QA	Quality Assurance

RFT	Request for Tender
RTO	Registered Training Organisation
SEE	Skills for Education and Employment
SLPET	Settlement Language Pathways to Employment and Training
SOSOG	Senior Officials Settlement Outcomes Group
SPIs	Service Provider Instructions
SPP	Special Preparatory Program
STARTTS	NSW Service for the Treatment and Rehabilitation of Torture and Trauma Survivors
TAC WA	Training Accreditation Council in Western Australia
TAE	Certificate IV in Training and Assessment
TESOL	Teaching English to Speakers of Other Languages
TOEFL	Test of English as a Foreign Language
TTS	Targeted Tuition Streams
VET	Vocational Education and Training
VFST	Victorian Foundation for Survivors of Trauma
VTS	Volunteer Tutor Scheme

Glossary

Student engagement: the number of students engaged with AMEP is described in three ways:

1. 'Commencement' refers to a student's initial enrolment in the AMEP.
2. 'Active student' refers to a student who has undertaken an AMEP activity within a given time period.
3. 'Enrolment' refers to any student who is enrolled in the AMEP but may or may not be active in a given time period. This could include students who have left the AMEP but have not formally exited the program.

The department: 'The department' is used to refer to the department responsible for the administration of the AMEP. At the time of commissioning this evaluation this was the Department of Education and Training. Machinery of government changes following the Federal election in May 2019 saw the AMEP transferred to the Department of Home Affairs.

Service Provider: There are 13 service providers contracted by the department to deliver the AMEP. One of these providers also has a separate contract to deliver Distance Learning. The department also contracts a quality assurance provider. Many of the service providers subcontract additional providers to deliver AMEP in their contract region. Four of these subcontractors provided submissions to the evaluation.

Student progression: Under the NBM, student initial and progress assessments are reported using the Australian Core Skills Framework (ACSF). Student progress in the AMEP is described using eight indicators: two each for the core skills of Reading, Writing, Learning and Oral Communication. For each indicator, a student can progress from Pre Level 1 A through to Level 3. From an Initial Assessment (IA), students are awarded ACSF outcomes to chart their training on their Individual Pathway Guide (IPG). Student progress is monitored by tracking a student's advancement across ACSF indicators during their time in the AMEP. Depending on their abilities, student advancement across the ACSF levels and within the core skills will vary, however at each progression point a minimum of one ACSF indicator progression is required by the program.

EXECUTIVE SUMMARY

Background

The Department of Education and Training (the department) commissioned Social Compass to undertake an evaluation of the Adult Migrant English Program (AMEP) new business model (NBM) which commenced on 1 July 2017. The purpose of the evaluation was to determine the appropriateness, effectiveness and practicality of the NBM reforms. The Australian Government announced the NBM in the 2016-17 Budget. The intent of the NBM was to improve student participation and English language proficiency through the provision of additional tuition hours for eligible students, enhanced monitoring of student improvements in English, and improved assessment and streaming processes. The NBM was also expected to simplify accountability processes, offer greater flexibility in service delivery and improve the efficiency and accountability of funding.

Key changes included:

- offering additional hours of English tuition to eligible students
- introducing a new reporting system, the Australian Core Skills Framework (ACSF) to monitor student progress
- establishing two new AMEP service streams: Social English and Pre-Employment English
- improving targeting of existing subprograms such as through uncapping access to the Special Preparatory Program (SPP)
- allowing service providers to choose curricula suited to their needs
- simplifying accountability processes by reducing the number of KPIs for service providers
- trialling of a multi-provider model in the Sydney South West contract region, where two providers were contracted to deliver the AMEP
- improving the efficiency and accountability of funding through changes in the funding model, including for child care

- increased alignment between the AMEP and Skills for Education and Employment (SEE) program.

The cost of the NBM was fully offset and remained within the AMEP's administered funding envelope. During the course of the evaluation, the responsibility for the administration of the AMEP was moved to the Department of Home Affairs. This report was submitted to the Department of Home Affairs.

The AMEP

The AMEP began as the Adult Migrant Education Program in the aftermath of the Second World War as migrants began to arrive from displaced persons camps in Europe. The first AMEP classes took place in 1948 in Victoria. In 1971, the AMEP became a legislated program through the *Immigration (Education) Act 1971*.

The Minister has a legislated obligation to provide 510 hours of English language tuition to eligible migrants and humanitarian entrants to Australia. The AMEP aims to help students learn foundational English language and settlement skills to participate socially and economically in Australian society. There are three delivery modes:

- full or part-time classroom-based tuition
- Distance Learning (DL): curriculum materials are discussed in a one-on-one relationship with the teacher, usually over the internet
- Volunteer Tutor Scheme (VTS): trained volunteers provide one-on-one English language tuition to clients at an agreed location.

In addition to the 510 hours, students have access to a range of supplementary programs providing additional tuition: the SPP, the Settlement Language Pathways to Employment and Training (SLPET) program, and AMEP Extend.

Evaluation methodology

Social Compass developed a mixed-methodology approach to determine the effectiveness, appropriateness and practicality of the NBM changes. This methodology included analysis of the significant AMEP program dataset, supplemented by extensive consultations with AMEP students, teachers and service providers, as well as community and professional stakeholders. These consultations centred around four metropolitan and three regional case study sites, and one case study of the DL program. The evaluation conducted thirty focus groups across seven contract regions in metropolitan and regional Australia with 404 AMEP clients from over 44 countries. Service providers, teachers and national stakeholders outside of the case study areas were given an opportunity to participate through interviews or surveys.

Recommendations

The evaluation makes 16 recommendations. Each of the NBM changes is discussed in turn below, and is followed by a recommendation.

The Special Preparatory Program should remain uncapped

The SPP provides refugee and humanitarian entrants with additional hours of English language tuition in the AMEP. It recognises that migrants on humanitarian visas often require extra learning support because of difficult pre-migration experiences, including torture or trauma, and/or limited prior schooling.

Eligible students are able to access either 100 or 400 SPP hours according to their age and number of years of prior schooling.

Prior to the NBM, the SPP budget was capped (the budget in 2016-17 was \$28.07 million). To be eligible, students had to provide evidence of difficult pre-migration experiences. SPP classes were limited to a maximum of 12 students per class.

Under the NBM, the SPP budget is uncapped. Students are no longer required to show evidence of difficult pre-migration experiences to be eligible. The department has removed the requirement for smaller class sizes for SPP students. The new funding model has abolished separate fees for SPP tuition.

Recommendation 1 – Special Preparatory Program

The Special Preparatory Program should remain uncapped and available to all AMEP humanitarian entrants.

Some stakeholders identified concerns that the removal of the cap on maximum class size and the removal of the higher SPP pricing have resulted in larger class sizes and almost no specialised classes for SPP students. Suggestions for addressing this issue are found in Recommendation 16 regarding the funding model.

AMEP Extend funding should be increased to better meet demand

AMEP Extend is a capped subprogram which offers up to 490 hours of additional English language tuition to eligible AMEP students. This subprogram was introduced under the NBM and has a budget of approximately \$4 million per year. The introduction of AMEP Extend reflects recognition by the Government that committed students who have used their 510 hours are more likely to achieve successful settlement and sustainable employment if they have access to extra English language tuition.

Students are eligible to apply for AMEP Extend if they are due to complete their 510 hours without attaining their language proficiency goals or reaching functional English. Students must also show good progress and attendance patterns to be eligible.

AMEP Extend has been welcomed by all stakeholders and is contributing to students' learning progress. However, there is considerable unmet demand. Service providers and students indicated that not all eligible students are offered access to the subprogram and the average offering is only 103 additional hours.

Recommendation 2 – AMEP Extend

The government should increase AMEP Extend funding to better meet demand.

Innovative Projects funding should be retained

The department established Innovative Projects funding to give service providers the opportunity, through a competitive process, to develop, trial and report on innovative service delivery. It was hoped that innovative projects would strengthen the AMEP, provide the department with key learnings from these projects for operational and future policy development, inform service provider behaviour nation-wide, and deliver better client outcomes.

While Innovative Projects funding has been welcomed by AMEP service providers, findings from funded projects do not appear to be well disseminated across the program. Consequently, benefits of these projects are limited.

Recommendation 3 – Innovative Project funding

Funding for innovative projects should be retained, however the department should develop a more long-term, systemic approach to innovation and dissemination of best practice.

This approach should involve processes that encourage collaboration between teachers across service providers to form ‘communities of practice’ that focus on innovative pedagogical approaches to address the needs of specific student cohorts in the AMEP.

Curriculum choice should be retained

Under the previous contract, all service providers across the AMEP used the same curriculum: Certificates in Spoken and Written English (CSWE). Under the NBM, AMEP service providers can select a curriculum that best meets the needs of their students. Providers must use a nationally accredited curriculum for Pre-Employment English, however they have the option of using non-accredited curriculum material for Social English.

While curriculum choice has been broadly welcomed, there is evidence that the current approval processes may not be sufficient to ensure that curricula are appropriate for English as an Additional Language (EAL) students.

There is also a perception among some service providers and teachers that numeracy cannot be taught under the NBM. While it is clear that numeracy is not reported against the ACSF, nothing prevents teachers from delivering numeracy-related material from an accredited, approved curriculum.

Recommendation 4 – Curriculum choice

Curriculum choice should be retained and curricula should remain subject to departmental approval. The approval process should include expert Teaching English to Speakers of Other Languages (TESOL) review to ensure that new curricula are appropriate for use in the AMEP.

The department should clearly communicate to service providers that they are permitted to teach numeracy as appropriate to the settlement needs of their students.

The Volunteer Tutor Scheme is a valued part of the AMEP

The Volunteer Tutor Scheme (VTS) provides opportunities for volunteers to assist AMEP students either through one-on-one tuition or as classroom assistants. The VTS is highly valued by most service providers and stakeholders. However, the availability and use of volunteer tutors varies significantly between service providers due to geographical and demographic factors. Currently there is no process to ensure that outgoing service providers pass on their volunteer tutor database to their successor.

Recommendation 5 – Volunteer Tutor Scheme

Stakeholders should consider ways to more systematically recruit and retain volunteers as part of the Volunteer Tutor Scheme.

See also Recommendation 8 which suggests using the new information management system to centralise volunteer tutor details.

Alignment of the AMEP with SEE should be continued and other post-AMEP pathways be considered

The Skills for Education and Employment (SEE) program provides up to 650 hours of accredited language, literacy and numeracy (LLN) training to jobseekers over a two-year period to help them participate in further training and/or the workforce. A 2015 evaluation of AMEP and SEE found that, although the two programs have different objectives and target groups, both are valued programs and each has the potential to benefit from the experiences of the other, including through shared treatment and/or systems. The evaluator found that certain levels of overlap between the services, particularly in terms of the needs of culturally and linguistically diverse clients, merited a greater degree of alignment between the two services.

The department has introduced several strategies to facilitate the transition of AMEP students into the SEE program. The most significant of these strategies was the alignment of reporting processes across the two programs. This alignment included:

- the introduction of the ACSF to report student progress in the AMEP
- the addition to the ACSF of Pre Level 1 A and B which allow low-proficiency students to demonstrate progress
- the modification of student progress reporting periods in SEE to match those of the AMEP.

There is evidence that AMEP students are transitioning more quickly to the SEE program under the NBM compared to the previous contract. The introduction of Pre Level 1 A and B has successfully accommodated the proficiency gap for AMEP students transitioning to SEE. However, duplication of assessments for students transitioning from AMEP to SEE and insufficient funding for SEE are two key issues preventing better alignment between the two programs.

While SEE provides an appropriate option for some AMEP students, only a minority of students are eligible. Consultations identified numerous alternative government programs (both state and federal) suitable for students transitioning from the AMEP. Alignment of these programs with the AMEP could

assist the significant number of students for whom the 510 hours and supplementary AMEP hours are inadequate to attain functional English.

Recommendation 6 – AMEP alignment to the Skills for Education and Employment (SEE) and other programs

The department should continue to improve the alignment of the AMEP to the SEE program, particularly in terms of information sharing between programs to eliminate duplication of assessments.

The policy focus on alignment should be extended to include improving transitions for all AMEP students into further English learning and vocational pathways. Future funding models might fund service providers to monitor, support and document student transitions.

Overarching recommendations to improve departmental strategic capability

The NBM introduced a suite of changes to the AMEP. While some of these changes were well received, others were not. Stakeholders, particularly AMEP teachers, reported increased workload, inefficiencies, confusion and decreased wellbeing. While organisational change is always difficult, some of the negative consequences of the NBM may have been avoided by better consultation and implementation processes throughout the transition to the NBM.

The evaluation makes two overarching recommendations which will assist the department to manage future changes to the program with minimum disruption.

The process of implementing the NBM has met with strategic, structural and operational challenges. With better expert advisory structures, some major challenges and unintended consequences of implementation may have been avoided. Organisational change literature argues that effective program redesign requires the active engagement of the staff who deliver the program. In the context of the AMEP, strategies for continuous improvement should draw on the expertise of those at the forefront of program delivery: the AMEP teachers and service providers.

Recommendation 7 – Creation of an AMEP Advisory Committee

The department should establish an AMEP Advisory Committee, representing all key stakeholders, to oversee change, innovation and continuous improvement in the AMEP.

The implementation of several elements of the NBM was hindered by the absence of an information management system (IMS) capable of accommodating the changes to the program. To adapt to new data collection and reporting requirements, the department supplemented the existing AMEP Reporting and Management System (ARMS) with a system of spreadsheets. This interim solution has increased workloads for the department and service providers.

Recommendation 8 – Information Management System

The department should prioritise the development of a robust information management system (IMS) to manage the AMEP. The new IMS should streamline:

- *collection of client information and attendance records by both AMEP and child care providers*
- *reporting of student progress*
- *monitoring of student use of their 510 and supplementary hours.*

It should also be used to centralise volunteer tutor information.

Distance Learning would benefit from multiple providers

Distance Learning (DL) provides AMEP students with the choice of learning English outside of the face-to-face classroom setting. All students are eligible for DL, even if they are attending classroom-based tuition. DL students have one-on-one classes with an AMEP teacher via Skype or telephone, and do

self-paced study using online materials or books and CDs. DL also provides the option of participation in an online 'virtual' classroom.

Previously, DL was delivered by a consortium of providers. Under the NBM, it is delivered by a single, national provider.

There has been a substantial decline in students enrolling in DL under the NBM, although students enrolled are progressing well. The evaluation has identified multiple structural factors contributing to this decline, including much higher levels of referral to DL from contract regions where the service provider is also a DL provider. It has also identified communication problems between the general service providers and the DL provider. These findings point to the value of having multiple DL providers such as through a consortium model (as in the previous contract) or multiple separate contracts.

Recommendation 9 – Distance Learning

The department should consider introducing multiple Distance Learning (DL) providers to the AMEP. A wider range of choice would:

- *encourage DL providers to promote their service offering to local providers*
 - *allow local providers and teachers to refer students to a DL provider that best complements their classroom-based tuition*
 - *facilitate service provision across multiple Australian time zones.*
-

Child care within the AMEP should be reviewed

Under the current and previous contracts, AMEP providers have been required to offer students free child care for their children who are under school age. Under the NBM, child care fees paid by the government to AMEP providers have two components: child care provision and a child care administration fee. AMEP service providers can choose to arrange for child care by subcontracting to existing child care facilities, paying for the costs of child care chosen by the student, or by running their own onsite child care or creche.

Provision of child care in the AMEP is vital to ensuring access to the AMEP for migrant parents, especially women. However, the misalignment between current funding arrangements and the broader child care sector is resulting in financial losses and administrative burdens for many service providers. Administrative problems are also exacerbated by the current information management system, which does not allow for ease of information sharing between AMEP and child care providers. Students in some locations are experiencing delays in accessing child care and therefore AMEP tuition because of the difficulties involved in sourcing and negotiating affordable child care.

Recommendation 10 – Child care

The government should conduct a review of child care within the AMEP. The aims of the review should be to examine funding, administration arrangements and provision models to optimise quality child care access for students, and minimise administration burden and funding gaps for the provider.

The multi-provider model should not be expanded in its current form at this stage

Under the new business model, there are 58 contract regions in the AMEP. All contract regions have a single provider, except for Sydney South West, where the department is trialling a multi-provider model (MPM). Two service providers, Navitas English and TAFE NSW, each have a contract to deliver the AMEP in Sydney South West.

The purpose of the multi-provider trial is to analyse the effect of increased competition on service delivery and client outcomes and determine the viability, risks and benefits of expanding the multi-provider model into other contract regions in future AMEP contracts. While there is some evidence that the MPM improves student access there is no evidence at this stage that competition is encouraging high quality, tailored, student-sensitive, flexible service delivery.

Recommendation 11 – Multi-provider model

Given insufficient evidence for the benefits of the multi-provider model (MPM), the department should not expand the MPM in its current form to other metropolitan contract regions at this stage. Any future trial of the MPM should be preceded by:

- *development of clear objectives*
 - *development of clear data collection methodologies for measuring improved participation and educational outcomes*
 - *analysis of alternative methods that may better achieve the stated objectives (e.g. subcontracting arrangements through a single provider).*
-

Key performance indicators should be amended

Under the previous contract, service providers were subject to 13 key performance indicators (KPIs). The transition to the NBM saw the number of KPIs decrease to four:

- KPI 1 (Participation): 90 per cent of eligible clients who complete an initial AMEP assessment or are referred to AMEP Distance Learning actually commence in the program within 6 months.
- KPI 2 (Attainment): 80 per cent of clients in Pre-Employment and Social English Streams attain one ACSF indicator per 200 hours of tuition.
- KPI 3 (Timeliness): 95 per cent of data is recorded and reported within the required timeframes.
- KPI 4 (Accurate Assessment): 80 per cent of client assessment outcomes are accurate against the ACSF.

Some service providers reported that KPI 1 does not describe an outcome that is within their control. While it is important that providers engage with potential students to encourage their commencement in the program, these migrants may choose not to commence in the AMEP for a variety of reasons that are unrelated to provider performance. In recognition of this concern, the department intends to modify KPI 1 to allow for students to formally defer their commencement in the AMEP.

While KPI 1 incentivises student commencement, there is currently no KPI that incentivises or measures recruitment activities undertaken by service providers.

The intent of KPI 2 (Attainment) is to ensure that the substantial public investment in the AMEP is justified by outcomes for students that can be reported to the government and the public. While the intent of KPI 2 is sound, implementation difficulties associated with the introduction of the ACSF have caused significant upheaval and increased workload for teachers and service providers in order to demonstrate their performance against this KPI. The practicality and effectiveness of KPI 2 should be improved when reporting processes are streamlined and service providers can report student progress using the chosen curriculum (see Recommendation 15).

KPI 3 (Timeliness) has been waived by the department until a new IMS is operational.

Implementation difficulties associated with the introduction of the ACSF have also made the criteria for KPI 4 (Accurate Assessment) time consuming and onerous for service providers to meet. Recommendation 15 suggests that curricula should be mapped to the ACSF, allowing service providers to report student progress against curriculum milestones which can be converted to an ACSF score by the department. If this recommendation is implemented, KPI 4 will no longer be necessary as accuracy of curriculum assessment is monitored by regulations governing Registered Training Organisations.

Recommendation 12 – Key Performance Indicators (KPIs)

KPI 1 – 90 per cent of eligible clients who complete an initial AMEP assessment or are referred to AMEP Distance Learning actually commence in the program within 6 months – should be modified to include an option for students to formally defer commencement.

The department should also consider development of a KPI to measure and encourage service provider recruitment activities.

KPI 2 – 80 per cent of clients in Pre-Employment and Social English Streams attain one ACSF indicator per 200 hours of tuition – should be amended in light of the proposed changes to student progress reporting (see Recommendation 15).

KPI 3 – 95 per cent of data is recorded and reported within the required timeframes – should be retained and applied only once a new information management system is implemented.

KPI 4 – 80 per cent of client assessment outcomes are accurate against the ACSF – should be discontinued in light of proposed changes to KPI 2.

To further ensure teaching quality in the AMEP, the department should consider working with the proposed AMEP Advisory Committee (see Recommendation 7) to develop continuous improvement strategies for service providers to implement.

Targeted Tuition Streams should be discontinued

The NBM introduced streamed tuition to the AMEP with the aim of providing more tailored services to meet student needs. The two streams, Pre-Employment English and Social English, reflect the Government's recognition that many students are seeking sustainable employment and would benefit from a stronger employment focus in their AMEP classes, while others are prioritising settlement in Australia and social participation within their community.

Pre-Employment English is for those students who wish to participate in the workplace or further training and is mandatory for those referred to the AMEP by an employment services provider. Classes deliver accredited training and cover skills of reading, writing, listening and speaking.

Social English is for those students who want to improve their conversational English in order to participate and live independently within their community. Classes deliver accredited or non-accredited training and focus on speaking and listening.

Despite the positive intent of the Targeted Tuition Streams, AMEP students have a wide and varied range of learning needs that have not been met by this initiative. Stakeholders are concerned that the streaming has contributed to a shift away from the settlement focus of the AMEP towards employment-focused outcomes. Targeted Tuition Streams have not resulted in significant differentiation of service delivery in the AMEP.

Recommendation 13 – Targeted Tuition Streams

The Targeted Tuition Streams should be discontinued. Future attempts to customise AMEP delivery should focus on the different learning needs of the diverse cohorts in the program and take into consideration factors such as age, level of education and literacy, and pre- and post-migration experiences.

Recommendation 3 suggests a methodology for the refinement of future subprograms.

Only teacher qualifications for non-accredited curricula should be stipulated in the contract

Under the previous contract, which only delivered the CSWE curriculum, teacher qualifications were not specified in the contract between AMEP service providers and the government. Teacher qualifications were instead mandated through the curriculum.

With the introduction of the NBM, the CSWE is no longer mandated. Service providers can choose an appropriate, approved curriculum. In order to ensure a minimum standard of training qualification across all AMEP delivery, the department included minimum teacher qualification requirements in the contract. These mandatory teacher qualifications are based on the teacher qualification requirements for the 2013 edition of CSWE. The department contracts a quality assurance (QA) provider to check that AMEP teaching staff possess the qualifications required by the contract.

The introduction of the additional teacher qualifications and the quality assurance process to monitor compliance resulted in:

- a different interpretation of which TESOL qualifications are eligible for the AMEP
- the initial disqualification of some experienced AMEP teachers
- confusion about which TESOL qualifications meet AMEP requirements.

The department responded by providing an exemption from AMEP contractual teacher qualification requirements from August 2018 until the end of the current contract.

Recommendation 14 – Teacher qualifications

Teacher qualifications for accredited AMEP curricula should be stipulated by curriculum licensing and regulations governing Registered Training Organisations, not by the contract between the government and the service provider.

Where the AMEP is delivered using non-accredited curricula, teacher qualifications should be stipulated in the contract.

AMEP teachers should hold appropriate qualifications. However, the high level of qualifications required to teach AMEP curricula makes recruitment of teachers in regional areas more challenging. The proposed AMEP Advisory Committee (see Recommendation 7) could advise the department on strategies for recruiting appropriately qualified teachers in regional areas.

The Australian Core Skills Framework should be reviewed by an expert team and mapped to curricula

The ACSF is 'a tool which assists both specialist and non-specialist English language, literacy and numeracy (LLN) practitioners describe an individual's performance in the five core skills of learning, reading, writing, oral communication and numeracy' (DET 2018a). The Australian Government funded the development of the ACSF to support strategies aimed at improving adult LLN for the workforce.

Since the introduction of the AMEP NBM, the initial and progressive assessments of students have been reported against the ACSF. One of the four KPIs under the NBM requires service providers to demonstrate that 80 per cent of students are improving by a minimum of one ACSF indicator per 200 hours of tuition.

Prior to the AMEP NBM, the AMEP used the International Second Language Proficiency Ratings (ISLPR) to assess students entering and exiting the program. Student progression in the AMEP was measured using CSWE curriculum completion rates.

Some AMEP service providers and other stakeholders identified the value of the ACSF as a standardised reporting/benchmarking tool. While poor implementation has contributed to problems with the use of the ACSF within the AMEP, teachers and service providers have more fundamental concerns about its appropriateness for use in EAL contexts. Teachers and service providers agree that the lack of alignment between curriculum and the ACSF is resulting in duplication of assessment and increased administration.

Teacher and service provider experience, analysis of program data, and comparison with ISLPR learning progress data from the ACIL Allen evaluation (2015a), all suggest that reporting student curriculum progress is more appropriate, effective and practical than reporting directly against the ACSF.

While there is a clear majority of service providers and teachers that view the ACSF as inappropriate for progress assessments, the use of the ACSF for the initial assessments is more contested. The department has invested considerable resources in streamlining the initial assessment against the ACSF. However, some teachers, service providers, and peak bodies such as the Australian Council of TESOL Associations (ACTA), would prefer to return to using the ISLPR.

Recommendation 15 – Australian Core Skills Framework (ACSF)

The department should establish an ACSF review team that includes:

- *TESOL experts*
- *ACSF experts/creators*
- *curriculum owners*
- *department representatives.*

The ACSF review team should:

- *assess the appropriateness and effectiveness of the ACSF to describe the English proficiency of English as an Additional Language (EAL) students for the purposes of initial assessment and progress reporting*
- *identify potential modifications that will better describe learning progress for EAL students, or identify other tools that are more fit for purpose.*

Based on the outcomes of this assessment, the review team should oversee the detailed mapping of curricula to the ACSF.

Service providers should report student curriculum progress to the department. Detailed mapping of curricula to the ACSF will allow the department to convert these progress reports to an ACSF score for program reporting purposes.

The funding model should be developed in consultation with service providers

Under the previous contract, the government paid service providers using the following fee structure:

- General AMEP tuition
 - general AMEP fee
- SPP tuition
 - higher fee than the general AMEP fee
 - maximum class size of 12
- SLPET tuition
 - higher fee than the general AMEP fee
 - additional work placement match fee.

Fees for all tuition modes were paid on a 'scheduled hours' arrangement. If a student attended all or part of a scheduled learning activity, the provider was paid for the whole session. The provider was not paid if the student did not attend the session.

The NBM introduced a common tuition fee across all tuition modes, general AMEP tuition, SPP and SLPET and the newly introduced AMEP Extend. The work placement match fee was retained for SLPET. The 'scheduled hours' funding model was replaced by an 'actual hours' model, in which tuition fees are paid for the hours a student was actually in attendance. Separate funding is no longer provided for counsellors or pathway guidance officers.

The intention behind the current hourly funding model is to benefit students by giving them the opportunity to recoup hours of tuition they have not

attended of a scheduled learning activity. However, service providers bear the significant cost of partial student attendance. The new funding model has also significantly increased the administrative burden on service provider staff, and the department, particularly in terms of recording student attendance. This administrative burden far outweighs the benefits to students.

In order to support service providers to propose realistic fees at the time of tendering, prospective providers require a good understanding of the potential impact of the funding model. Key information required to understand the impact includes:

- existing and projected students
- the number of hours used by students
- attendance patterns
- costs and issues associated with child care.

Recommendation 16 – Funding model

On the understanding that the funding model design influences service provider behaviour, the department should work with providers to develop a funding model which reduces administrative burden, and incentivises practices—such as smaller class sizes for the Special Preparatory Program and holistic case management—that improve English language acquisition and settlement outcomes.

Details of the funding model and an associated minimum dataset should be provided to prospective tenderers as part of future contract tender processes.

INTRODUCTION

1.1 Structure of this report

This report is divided into nine sections. The introduction, section 1, outlines the history of the Adult Migrant English Program (AMEP), the AMEP new business model (NBM), and the purpose of this evaluation.

Section 2 outlines the evaluation methodology.

Section 3 provides an overview of the AMEP under the NBM, including a summary of program data and case studies.

Sections 4 to 9 identify the key findings and recommendations arising from the evaluation findings.

Section 4 provides overarching recommendations for AMEP governance.

Section 5, 'Adult Migrant English Program and subprograms', examines the Special Preparatory Program, AMEP Extend, Targeted Tuition Schemes, and Distance Learning.

Section 6, 'Teaching the Adult Migrant English Program', explores curriculum choice, teacher qualifications, and the Australian Core Skills Framework.

Section 7, 'Provider performance', analyses the key performance indicators used to monitor the AMEP.

Section 8, 'Client support', investigates the support provided to AMEP students through child care and the Volunteer Tutor Scheme.

Section 9, 'Program structure and innovation', examines the multi-provider model, how the AMEP aligns with the Skills for Education and Employment program, Innovative Projects funding, and the AMEP funding model.

1.2 History of the Adult Migrant English Program

The AMEP began as the Adult Migrant Education Program in the aftermath of the Second World War as migrants arrived in Australia from displaced

persons camps in Europe. The first AMEP classes took place in 1948 at the Bonegilla Migrant Reception and Training Centre near Wodonga in Victoria. Migrant centres also opened that same year in New South Wales and Western Australia. The AMEP also provided English classes prior to embarkation as well as shipboard tuition on the journey to Australia. Initially, responsibility for the AMEP lay with the Commonwealth Office of Education. In 1951, overall coordination of the AMEP passed to the Department of Immigration (Martin 1998, pp.2-15).

From 1969, the AMEP started to deliver intensive, full-time courses aimed at equipping migrants with English for employment purposes. This change of emphasis was based on the realisation that the existing program was not adequate for skilled migrants to improve their English sufficiently to use their professional skills and qualifications. In 1971, the AMEP became a legislated program, with its administrative and eligibility requirements defined in the *Immigration (Education) Act 1971* (Martin 1998, pp.12-13).

Considerable development took place in the AMEP after the publication in 1978 of a government-commissioned review of migrant services and programs, known as the Galbally report. This review led to a number of changes in the AMEP, including the establishment of a joint Australian Government and state and territory government committee to oversee the program, and the development of the Australian Language Proficiency Ratings to evaluate student progress (Martin 1998, pp.18-21, 65).

The next review of the AMEP was by the Australian Institute of Multicultural Affairs (AIMA), in 1981. The AIMA review recognised the positive changes that had occurred in AMEP following the Galbally report, but was critical of the AMEP data collection practices and highlighted the need for a computerised information management system (Martin 1998, pp.22-23).

The 1985 Report of the Committee of Review of the Adult Migrant Education Program (the Campbell

report) raised concerns about the quality of service being delivered in AMEP. It noted problems with accessibility, retention rates and the fact that many students were dropping out of the program before achieving English proficiency. The 1980s and 1990s saw a series of attempts to increase the professionalism within the AMEP and define areas of responsibility within government. In the early 1990s, AMEP started to focus predominantly on tuition for new and recent arrivals to Australia and its name changed to the Adult Migrant English Program.

Competitive tendering was introduced to the AMEP in 1997 in line with the National Competition Policy. This aimed to make the program more flexible, cost effective, appropriate and accountable. Under the competitive tendering model, service providers included TAFEs, universities, Adult Migrant Education Services, private providers and community agencies.

In 2013, the AMEP transferred from the Department of Immigration and Border Protection to the Department of Industry. In 2014 the program was transferred to the Department of Education and Training (the department¹), but machinery of government changes following the May 2019 federal election have seen the program move to the Department of Home Affairs.

In 2014-15, ACIL Allen Consulting conducted an evaluation of the AMEP, examining the appropriateness, effectiveness, efficiency and performance management of the AMEP. This was undertaken in conjunction with an evaluation of the Skills for Education and Employment program and explored opportunities for strategic alignment between the two programs.

In 2017-18 the department introduced a new business model.

1.3 New business model

The AMEP NBM was announced by the Australian Government in the 2016-17 Budget. Delivery commenced on 1 July 2017, with the new AMEP contract period of July 2017-June 2020. The contract includes the option of extending for up to a further three years, to June 2023.

The specific changes are outlined in Table 1.

1.4 Purpose of the evaluation

This evaluation analysed several features of the AMEP. The key objectives were to:

1. examine the appropriateness, effectiveness and practicality of the NBM elements listed in Table
2. examine the appropriateness, effectiveness, value and viability of a multi-provider service delivery model in the AMEP and make a recommendation on the advantage and viability of expanding the multi-provider model into other contract regions
3. examine the effectiveness of the provision of child care for AMEP clients and service providers' ability to support their clients' child care needs
4. determine the success or otherwise of the alignment between the AMEP and SEE, with particular emphasis on the use of the ACSF as a common reporting framework for English proficiency; a combined procurement process for AMEP and SEE; and the introduction of similar administrative arrangements
5. assess the Distance Learning and Volunteer Tutor Scheme subprograms.

¹ 'The department' is used to refer to the department responsible for the administration of the AMEP. At the time of commissioning this evaluation this was the Department of Education and Training. Machinery of government changes following the Federal election in May 2019 saw the AMEP transferred to the Department of Home Affairs.

Table 1: Summary of changes to the AMEP from 1 July 2017

DESCRIPTION	PREVIOUS CONTRACT	CONTRACT FROM 1 JULY 2017
1. Targeted tuition streams	The AMEP delivered using a single 'one size fits all' stream of tuition for all clients.	Clients can choose from two streams of tuition – Pre-Employment English and Social English – to better meet the diverse needs of clients
2. Uncapping Special Preparatory Program (SPP)	SPP was a capped subprogram offering additional hours and support to selected humanitarian entrants with difficult pre-migration experiences and limited schooling.	Funding for SPP has been uncapped, providing all humanitarian entrants access to this subprogram.
3. Additional tuition hours	Clients could access additional tuition hours under two subprograms: SPP and Settlement Language Pathway to Employment and Training (SLPET).	In addition to SPP and SLPET, clients can access AMEP Extend - a new, capped program that offers up to 490 hours of additional tuition to eligible clients who complete 510 hours without achieving their English language proficiency goals.
4. Multi-provider model trial	A single service provider delivered AMEP in each contract region.	A multi-provider model is being trialled in the Sydney South West contract region, with two providers contracted to deliver AMEP in that region.
5. Innovative Projects funding	There was no project-based funding available.	The Innovative Projects fund enables providers to develop, trial and report on innovative service delivery. ²
6. Initial assessment	Students were assessed using the International Second Language Proficiency Ratings (ISLPR) on entry to the AMEP.	Students are assessed against the Australian Core Skills Framework (ACSF) on entry to the AMEP. The ACSF is a common tool used by Vocational Education and Training providers in other programs including the Skills for Education and Employment (SEE) program.
7. Enhanced assessment	Exit assessments were not mandated. Service providers were not required to conduct progressive assessments during the student's time in the program.	Providers are required to undertake progressive assessments (every 200 hours) and exit reviews to monitor student language attainment.
8. Performance management	Service provider performance was managed through key performance indicators (KPIs) that were not outcomes-focused.	The new 'Attainment' KPI requires AMEP providers to ensure that 80% of student progress at least one ACSF indicator per 200 hours of tuition.
9. Curriculum	All service providers uses the same accredited curriculum – Certificates in Spoken and Written English (CSWE).	Service providers can choose the curriculum that best meets their students' needs.
10. Teacher qualifications	None stipulated	Stipulated program, curriculum licencing and regulatory requirements.
11. Funding model	Service providers were paid separate rates for the range of services that they provide including SPP, SLPET, counsellor services and home tutoring.	SPP, SLPET no longer attract a separate rate and all costs are included in the hourly tuition fees.

² The funding for Innovative Projects was redirected from the previous Home Tutor Scheme Enhancement Program (HTSEP).

METHODOLOGY

2.1 Overview

Social Compass used qualitative and quantitative methods in the evaluation. This approach captured the perspectives of all key stakeholders in the Adult Migrant English Program (AMEP)—students, teachers, service providers, community stakeholders, government stakeholders, professional bodies such as the Australian Council of TESOL³ Associations (ACTA), the AMEP quality assurance provider, and the Department of Education and Training (the department). Social Compass also ran focus groups with AMEP students to gather their views and perspectives. This qualitative data was triangulated with evidence from relevant literature on migrant experiences of language learning as well as from program documentation (including the 2015 ACIL Allen evaluation), and quantitative program data from both the AMEP and other related programs.

Social Compass conducted eight case studies to demonstrate the diversity of contexts, service provider models, and local dynamics of the program. This approach captured the geographic diversity of the program through four metropolitan sites (Sydney South West, Melbourne West, Melbourne North West and Perth North), three regional sites (Darling Downs, Darwin and Wimmera Mallee), and the AMEP Distance Learning (DL) program. The case studies also spanned the range of service provider types, including not-for-profit, TAFE, and independent providers, and included service providers that had retained their contracts through the transition to the new business model (NBM), new service providers, and providers that are new to their particular contract area.

Three primary evaluation questions were developed to guide the data collection:

1. To what extent has the NBM provided appropriate services that are relevant and responsive to student needs?
2. To what extent has the NBM been effective in achieving its objectives and creating positive outcomes for students?
3. To what extent is the NBM practical for service providers to implement?

2.1.1 Program data analysis

The AMEP evaluation employed two government data sets for quantitative analysis: AMEP de-identified student data, Skills for Education and Employment (SEE) de-identified student data and migration data.

The de-identified student data relates to students enrolled in the AMEP during the period from July 2013 to December 2019. In addition to data from the five financial years of 2013-14 to 2017-18 inclusive, data includes student information for the additional six-month period to the end of 2018. Data from this additional period was included to provide data stability and enable comparisons between the previous contract period and the NBM, particularly as evidence suggested the transition period from July to December 2017 was difficult for service providers. The extended dataset was included in the analysis where it was deemed to be informative.

The AMEP student data includes attendance hours within the 510-hour AMEP and each subprogram — Special Preparatory Program (SPP), AMEP Extend, Settlement Language Pathways to Employment and Training (SLPET), Volunteer Tutor Scheme (VTS) and DL—by financial year. Increases or decreases in attendance hours were examined in relation to changes made under the NBM.

In this report, student engagement with AMEP is described in three ways. In many cases, AMEP activity is reported by 'commencement', which is the year that a student first enrolled in the AMEP. However, the year of commencement is not necessarily the year that any or all AMEP activity took place. Students are not consistently active throughout

³ Teaching English to Speakers of Other Languages

the time between their enrolment and the time they leave the program. They may leave and re-enter the program, resulting in absences for months or years. Students may be sporadically active in the program for up to five years. In this report, the term 'active students' refers to those students who have participated in any AMEP activity within a given time period. The term 'enrolments' refers to the number of students registered in the AMEP in a given time period. These students may or may not be active.

AMEP student data also includes information on student progress. Before the NBM, service providers reported student completion of curriculum modules and competencies from the Certificates in Spoken and Written English (CSWE). Under the NBM, student progress is reported against the Australian Core Skills Framework (ACSF).

Datasets from the AMEP and the SEE databases were provided by the department to evaluate the alignment between AMEP and SEE. The programs do not share student identifiers, so indicative matched data was used to identify students who have transitioned from AMEP into SEE.

The data visualisation tool, Tableau, was used to explore the quantitative data for patterns and trends, and to aggregate the data for descriptive tables. When associations relevant to the evaluation questions were observed, a statistical software package, SPSS, was used in order to discern any statistical significance to the observed patterns.

2.1.2 Stakeholder consultations

Stakeholder consultations included focus groups with AMEP students and a pre-focus group survey, a survey with AMEP students enrolled in DL, interviews, and pre-interview surveys, a supplementary survey for AMEP service providers, teacher surveys, and written submissions. QSR NVivo, a qualitative and mixed-methods software application, was used to classify the themes that emerged from interviews, focus groups and open-ended survey questions.

2.1.3 AMEP students

Social Compass conducted 30 client focus groups across the seven case study regions (excluding DL) which included a total of 404 AMEP students. A short survey was implemented at the beginning

of each focus group to collect quantitative data from participants attending the focus groups. AMEP students enrolled in DL at the time of this evaluation were invited to participate in an online survey. Thirty-nine students participated in this survey.

Two methods were used to recruit students for focus groups. Social Compass contacted community organisations in each of the case study regions to assist in organising focus groups with their clients who had participated in the AMEP. This approach, which did not involve the AMEP service provider, was employed to ensure students felt free to talk about their experience of the AMEP. In case study areas where there was a limited response to this approach, the service provider was approached for assistance with participant recruitment. All service providers were supportive of this request. This approach resulted in 14 focus groups organised by community organisations and 16 organised by service providers. The number of students in the focus groups varied between six and eighteen students. The exceptions were two focus groups in Sydney South West that had higher participation (36 and 68 participants) and two focus groups in Darling Downs that had lower numbers (two participants each). For the DL case study, teachers referred students who had expressed an interest in participation. The service provider distributed the survey to these students via an online survey link.

2.1.4 Stakeholder interviews and surveys

All service providers and the department were invited to provide a list of key staff and stakeholders to include in the research. Stakeholders who agreed to participate in the evaluation were also asked to fill in a pre-interview survey. Interviews were conducted with service providers, teachers, community stakeholders, government stakeholders, professional bodies such as ACTA and Linda Wyse and Associates (the quality assurance provider), the department, jobactive stakeholders, and other organisations and individuals involved with the AMEP NBM. Some stakeholders preferred one-on-one interviews with a consultant, whilst others preferred a group interview with their colleagues. Social Compass recorded, transcribed and coded the interviews using NVivo software. A total of 85 interviews with 116 stakeholders were conducted. Fifty pre-interview surveys were

completed. A supplementary survey of AMEP service providers gathered further information about the operation of SPP, AMEP Extend, Targeted Tuition Streams, the VTS and child care. All AMEP service providers responded to this survey.

2.1.5 Stakeholder submissions

All stakeholders identified by the service providers and the department were invited to provide a written submission to the evaluation. Based on initial interviews with stakeholders and desktop analysis, the submission focused on four questions relating to the evaluation objectives. The evaluation received a total of 40 submissions, with 14 from AMEP service providers (four of which are subcontractors), 13 from community organisations, eight from government agencies, and one each from a jobactive provider, a SLPET partner, an expert peak body (ACTA), a teachers' union local branch representative, and a child care service provider.

2.1.6 AMEP teachers

ACTA, the Australian Education Union and service providers all nominated teachers to participate in this evaluation. Both qualitative and quantitative research methods were used to explore the perspectives of AMEP teachers. Participants were asked to complete a survey and to participate in an interview.

Analysis of initial interviews informed the development of the online teacher survey which teachers accessed through the Australian Consortium for Social and Political Research CANVASS platform. The survey was developed in consultation with the department, the quality assurance provider and ACTA.

Service providers sent the survey link to teachers. Four hundred teachers participated in the survey—an overall response rate of 20 per cent. Teacher participation rates varied significantly between service providers; the range was six to 55 per cent.

To gain further understanding of the AMEP teacher perspective, Social Compass attended three teacher forums organised by ACTA. These took place in Sydney (2 March 2019), Melbourne (30 March 2019) and Brisbane (6 April 2019). Social Compass consultants attended these forums in an observer role and issues raised at these forums were not used as a data source in the analysis.

2.1.7 Evaluation Advisory Committee

An evaluation Advisory Committee was established to provide advice at key stages of the evaluation. The Advisory Committee met to review initial findings (a face-to-face meeting on 15 April followed by a teleconference on 24 April 2019) and draft findings and recommendations (on 15 May 2019). Membership of the Committee included:

- departmental representatives
- three service providers (including TAFE, independent and not-for-profit Registered Training Organisations)
- one senior community representative with extensive experience in migrant services
- representatives from the Department of Social Services
- one AMEP teacher.

2.1.8 Australia Council of TESOL Associations

Social Compass consulted closely with ACTA throughout the evaluation. As the peak body for TESOL teachers, ACTA has advocated on behalf of AMEP teachers regarding elements of the NBM and the program more generally. Social Compass included an ACTA nominee in the stakeholder interviews, attended the teacher forums organised by ACTA, invited ACTA to nominate teachers to participate in interviews, and consulted with the ACTA President and Vice-President at the conclusion of the data collection processes. ACTA also provided a submission followed by a supplementary submission to the evaluation.

2.1.9 Ethics clearance

Ethics clearance was sought and obtained from the Bellberry Human Research Ethics Committee. All participants were provided with a tailored information statement that outlined confidentiality arrangements, including possible limitations, how the data would be used, and emphasised the voluntary nature of participation. All participants were asked to provide written consent if they chose to participate.

THE ADULT MIGRANT ENGLISH PROGRAM TODAY

3.1 Migrant language tuition in a global context

Many countries that receive high numbers of migrants offer language courses for migrants. These are often incorporated into broader settlement and integration courses. Some countries in Europe have mandatory introductory immigration integration courses, such as Germany, France and the Netherlands. Others, such as Denmark, Sweden and Ireland have voluntary courses (Shields, Drolet & Valenzuela 2016, pp.45-48). In Australia, student participation is voluntary.

As noted in a 2017 evaluation of Canada's Settlement Program, there is significant variation in the degree of state funding for these programs. Canada and Australia lie at one end of the spectrum, with comparatively high levels of federal government funding. Great Britain and the United States, at the other end, take a more laissez-faire approach of limited government support (IRCC 2017, p.5). In England, provision of English for Speakers of other Languages (ESOL) is relatively fractured, suffering from reduced funding and long waiting lists (Foster & Bolton 2018, p.4).

The scale and operations of the Canadian government-funded English language program is similar to the Adult Migrant English Program (AMEP) in Australia. The Canadian Language Instruction for Newcomers to Canada (LINC) is managed through Citizenship and Immigration Canada (CIC) as a settlement program. In six of Canada's provinces there are no time limits for eligible clients and classes are based on national standards (CIC 2010).

Similar publicly funded models exist in countries such as Germany (integration courses including 900 hours of language instruction and 45 hours of civics lessons) and France (up to 400 hours of language tuition). These models are highly integrated into settlement processes (IRCC 2017, pp.5-6). Canada, Germany and France all offer child-minding services alongside language and settlement courses (IRCC

2017, p.6). Norway offers up to 3000 hours of tuition, provided by municipalities. Similar to Australia, training is offered for up to five years from the granting of a residency permit, but is only free for up to three years (Norwegian Government 2014).

The AMEP in Australia is comparable to the programs offered in other countries. After meeting certain eligibility criteria, migrants have access to at least 510 hours and up to 1600 hours of tuition (Australian Government 2018, p.8). Free child care is also available for parents. Although the AMEP offers fewer tuition hours than Norway and Canada, it is nevertheless one of the more extensive language programs by global standards.

3.2 Adult Migrant English Program: the national picture

3.2.1 The program

The AMEP provides up to 510 hours of English language tuition to eligible migrants and humanitarian entrants to help them learn foundation English language and settlement skills to enable them to participate socially and economically in Australian society. There are three delivery modes:

- full or part-time classroom-based tuition: this can be provided flexibly during the day, evening or weekends in formal or community settings
- Distance Learning (DL): curriculum materials are mailed out to clients and discussed weekly, usually online in one-on-one sessions with a teacher. These lessons are complemented by self-paced online learning and an optional virtual classroom
- Volunteer Tutor Scheme (VTS): trained volunteers provide one-on-one English language tuition to clients, at an agreed location. Volunteer tutors are required to undergo training by the service provider. Volunteer tutoring can be combined with class-based tuition and DL.

In 2017, with the introduction of the new business model (NBM), the AMEP increased its number of contract regions from 27 to 58. The new contract regions accord with those of the Skills for Education and Employment (SEE) program. These contract regions are based on the Job Services Australia contract regions, with minor variations. Contract regions are classified as metropolitan, regional or remote. There are 14 metropolitan, 33 regional and 11 remote contract regions. In five remote contract regions (West Queensland, Central Queensland, Far North Queensland, Remote South Australia, and Top End Northern Territory) there is no local service provider and clients rely solely on DL. One contract region, South West Sydney, is the location of a multi-provider trial with two service providers in the one contract region. All other regions have a single service provider.

In addition to the 510 hours there are also a range of supplementary programs providing additional tuition.

- Special Preparatory Program (SPP): a 100 or 400-hour program which provides additional support to humanitarian visa holders prior to their commencement in the AMEP.

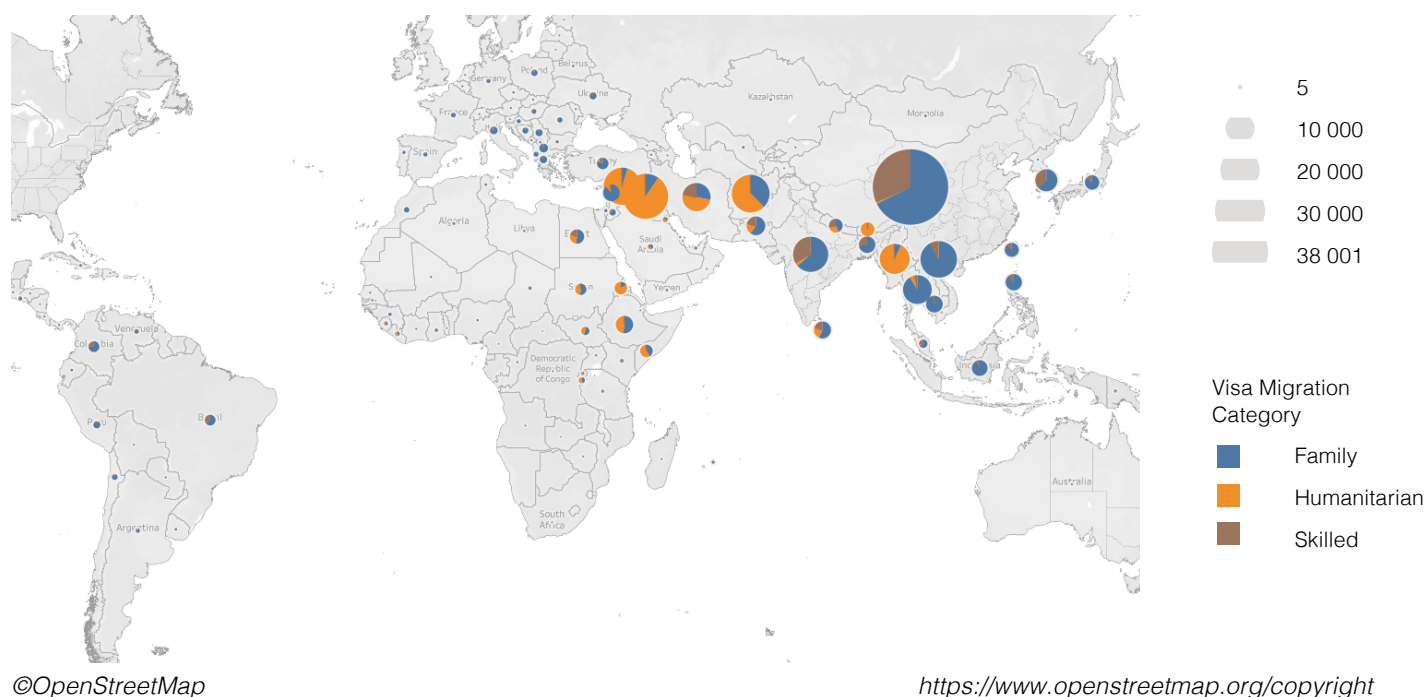
- Settlement Language Pathways to Employment and Training (SLPET) Program: a 200-hour program focusing on preparing students for employment or vocational pathways.
- AMEP Extend: up to 490 extra hours of AMEP tuition available to students who have completed their 510-hour allocation but are yet to reach functional English.

3.2.2 Demographics

The following section provides an overview of the migrants accessing the AMEP,⁴ supplemented by an overview of case study data collected for this evaluation. Together, these data sources illustrate the program's reach and impact at a national level as well as its variability across the 58 contract regions.

Figure 1 shows the country of origin of AMEP students. AMEP students come from 197 countries and speak 267 languages.

Figure 1: Countries of origin of AMEP students



⁴ Client data provided by the Department of Education and Training for this evaluation includes AMEP students who commenced in the program between 1 July 2013 and 31 December 2018. Students who commenced prior to 1 July 2013 are not included in the data. The dataset consists of almost 150 000 individual records. The data period includes the previous contract from July 2013 to June 2017, and the new business model from July 2017 to December 2018. This data was extracted by the department on 20 December 2018.

To be eligible to participate in the AMEP, migrants must hold an eligible permanent visa from either the humanitarian, family or skilled visa stream⁵ and have less than functional English. Functional English is defined against the Australian Core Skills Framework (ACSF). Those with ACSF level 3 proficiency or above across the core skills of reading, writing, learning and oral communication are deemed to have functional English.

Eligible visa holders must meet legislated timeframes for registration, commencement and completion. They must register with an AMEP service provider within six months of their arrival in Australia (or within 12 months if they are under 18 years old), commence tuition within 12 months and finish within 5 years.

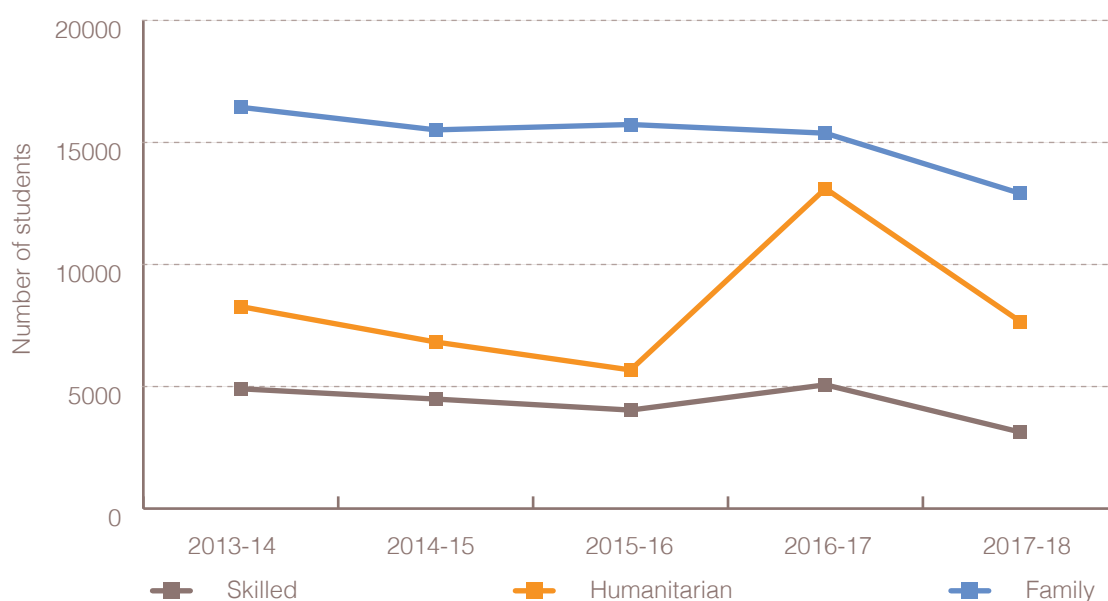
Figure 2 shows AMEP commencements each year since 2013 by visa stream. Family visa holders consistently represent the highest proportion of commencements. Geopolitical events inevitably

have an impact upon AMEP enrolment numbers and demographics. This is illustrated by the increase in humanitarian visa holders in 2016-17 that coincided with the government's decision in December 2015 to accept an additional 12 000 Syrian and Iraqi humanitarian entrants to Australia.

A relatively high proportion of humanitarian migrants (52 per cent) participate in AMEP. Almost one quarter of family visa holders (24 percent) and seven per cent of skilled/other visa holders enrol in the AMEP. Data is not available on the numbers of migrants in these eligible visa streams who have less than functional English but who do not register in the AMEP.⁶

Table 2 shows total expenditure and average cost per client for the past three financial years. The cost per student has stayed relatively stable, despite fluctuations in student enrolments.

Figure 2: Number of AMEP commencements by visa stream



⁵ The following temporary visa classes are eligible for AMEP: Bridging F (Class WF); Business Skills (Provisional) (Class UR); Business Skills (Provisional) (Class EB); Interdependency (Provisional) (Class UG); Partner (Provisional) (Class UF); Partner (Temporary) (Class UK); Resolution of Status (Temporary) (Class UH); Safe Haven Enterprise (Class XE); Skilled – Designated Area-sponsored (Provisional) (Class UZ); Skilled – Independent Regional (Provisional) (Class UX); Skilled – Regional Sponsored (Subclass 475); Skilled – Regional Sponsored (Subclass 487); Skilled – Regional Sponsored (Subclass 489); Temporary (Humanitarian Concern) (Class UO); and Temporary Protection (Class XD) (Immigration (Education) Act 1971).

⁶ Data provided by the department.

Table 2: Annual AMEP expenditure

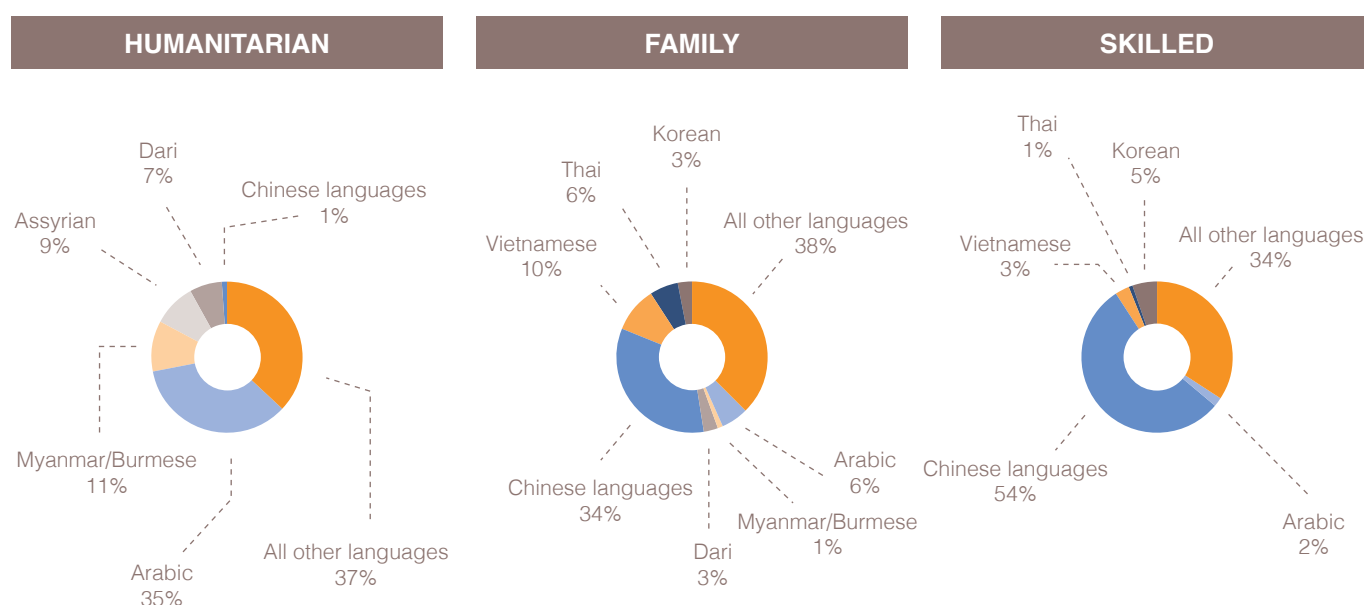
FINANCIAL YEAR	EXPENDITURE*	AVERAGE COST PER CLIENT**	STUDENTS ENROLLED***
2017-18	\$210.612m	\$4281	52968
2016-17	\$274.524m	\$4280	64140
2015-16	\$246.380m	\$4152	59344

* Data provided by the department

** Average cost includes all supporting services such as child care services and Volunteer/Home Tutoring. Department expenses are not included.

*** Enrolments include commencements plus those students continuing in the program from previous years.

Figure 3: Languages spoken by AMEP students within each visa stream—2013-2018



3.2.3 Language

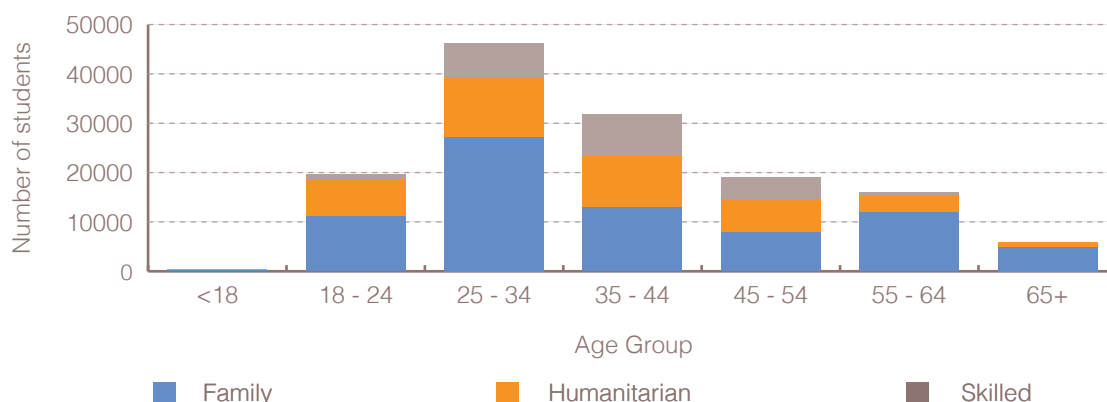
Figure 3 shows the proportion of major languages spoken by students within each visa stream. The most commonly spoken languages among students holding humanitarian visas are Arabic, languages from Myanmar (including Burmese and Karen) and Assyrian. Among family visa holders, the most commonly spoken languages are Mandarin/Chinese⁷ and Vietnamese. Mandarin/Chinese is also the most common language among the skilled visas holders. Other major language groups across the national client base include Dari, Thai and Korean. As demonstrated by the case studies, the major languages spoken vary across contract regions.

3.2.4 Age

The age of AMEP students varies widely. The largest proportion of commencements during the period 2013-19 comprised students aged between 25 and 44 years. Figure 4 shows age groups by visa stream. Skilled visa holders are primarily aged between 25 and 54 years. While family visa holders dominate every age group, they account for almost all of students aged 65 years and over, and close to three quarters of the 55-64 years age group.

⁷ Note that the Chinese category is inclusive of a range of languages spoken in China including Mandarin.

Figure 4: Commencements by age group and visa type—2013-2018



3.2.5 Gender

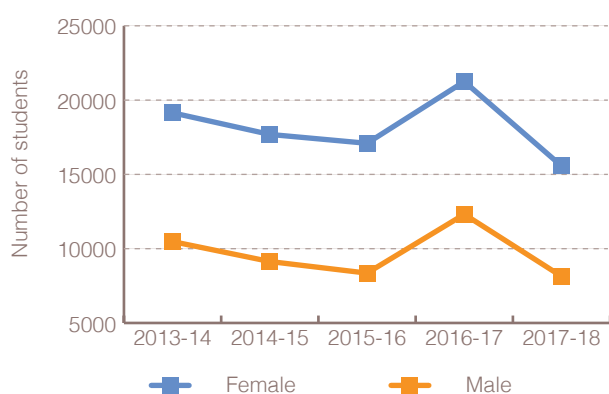
Figure 5 shows that female commencements have consistently outnumbered male commencements throughout the 2013-18 period.

Figure 6 breaks down commencements by gender in each visa stream. The humanitarian cohort is relatively balanced, with slightly more men than women. There are twice as many female skilled migrants as there are male skilled migrants and nearly three times as many female family migrants as there are male family migrants.

3.2.6 States and territories

Figure 7 shows commencements by state or territory from 2013 to 2018. New South Wales and Victoria have the most commencements, followed by Queensland, Western Australia and South Australia. The pronounced peaks in the data for New South Wales and Victoria in 2016-17 reflect the intake of Syrian and Iraqi humanitarian visa holders, and the fact that a high proportion of this cohort resettled in these two states.

Figure 5: AMEP commencements—2013-2018



**** Female includes < 5 unspecified gender in each year**

Figure 6: AMEP commencements by visa stream and gender—2013-2018

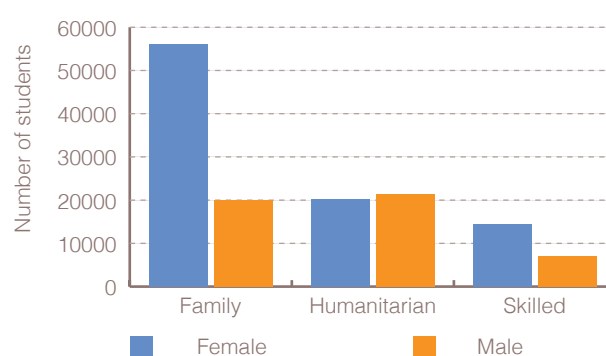
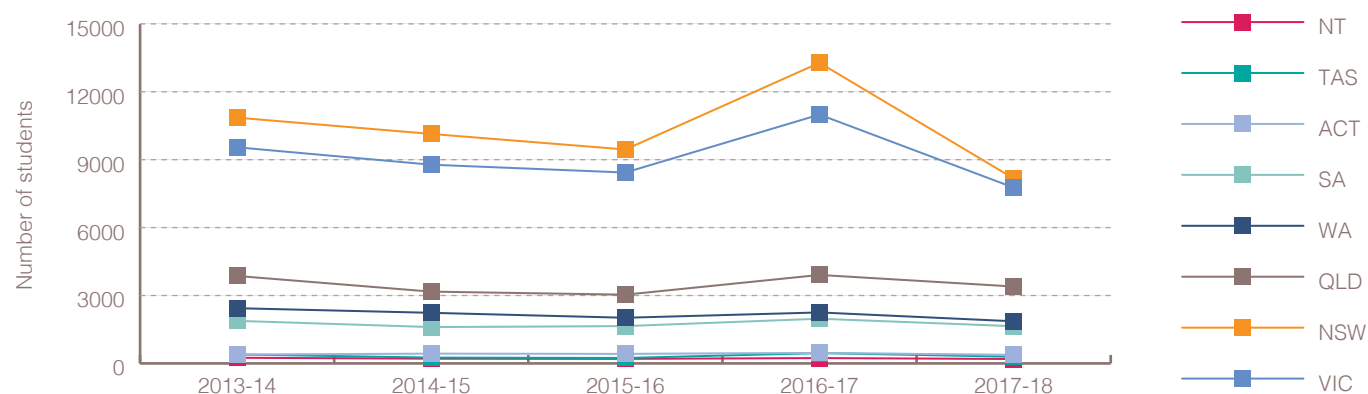


Figure 7: AMEP commencements by state and territory—2013-2018



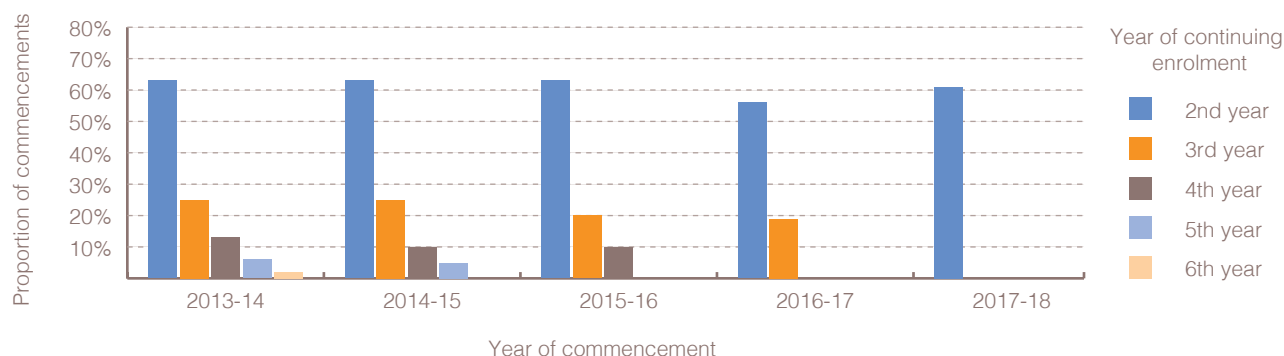
3.2.7 Transition to the new contract

The implementation of the NBM in 2017-18 saw significant changes to student entry and assessment processes. At the same time, several new providers entered the program. The substantial drop in commencements in 2017-18 (see Figures 5 and 7) should be considered in the context of the unusually elevated numbers in 2016-17. The 2016-17 spike reflects the intake of an additional 12 000 humanitarian migrants into Australia. Commencements in 2017-18 returned to a level similar to that of 2015-16. In contrast, AMEP enrolments (Table 2) were substantially lower in 2017-18 compared to both 2016-17 and 2015-16. This lower enrolment number is partly due to a significant number of AMEP students who did not continue in the program after the transition to the NBM. There were

many service providers who changed and significant numbers of students did not transfer to the new providers. The lower enrolment number is also due to the spike in the number of humanitarian migrants returning to usual levels as the 12 000 additional Syrian and Iraqi refugees accepted to Australia worked their way through the system.

The impact of the transition to the NBM can be considered in terms of student retention. As Figure 8 shows, the proportion of students that enrolled under the previous contract and continued in the AMEP under the NBM in 2017-18 was 56 per cent. This is lower than for all previous years in the dataset (when it was about 62 per cent). However, student retention from the first to the second year improved to 60 per cent in the first six months of 2018-19, indicating a return to pre-NBM levels of student retention.

Figure 8: Percentage of students continuing in the AMEP after year of commencement



3.3 Case studies

Social Compass adopted a case study methodology to explore student, service provider and stakeholder experience of the AMEP and the NBM in seven geographically diverse contract regions: Sydney South West, Melbourne West, Melbourne North West, Perth North, Darling Downs, Wimmera Mallee and Darwin.⁸ A summary of student focus group participation by case study area is in Table 3.

While some variation is to be expected across seven different service providers in seven different geographical regions across the country, a number of fundamental features of AMEP service provision remain consistent. These include flexibility in delivering tuition, catering to student needs, engagement with broader community services and targeted classes for specific levels of English proficiency or particular age groups.

In four of the case study regions (Perth North, Darling Downs, Sydney South West and Melbourne North West) the AMEP is delivered by TAFEs, which provide a traditional campus-style education with broader TAFE support services (e.g. counselling). In Melbourne North West, Melbourne Polytechnic has partnered with another TAFE and two

community-based providers. The combination of Learn Local⁹ sites and TAFE allows a broader choice in delivery for AMEP clients.

In three of the case study regions (Melbourne West, Darwin and Wimmera Mallee) the AMEP is delivered by not-for-profit community organisations. The Wimmera Mallee provider, AMES Australia, is also the local Humanitarian Settlement Program (HSP) provider and is co-located with Sunraysia Mildura Ethnic Community Council, the Settlement Engagement and Transition Support provider. This enables AMES Australia to integrate and streamline service provision to students through a 'hub' model, in which they act as the 'landing place' for migrants and bring in a range of health and other support services. Learning for Employment, the Melbourne West provider, has a network of community-based providers delivering the AMEP in 24 different sites.

In one case study region, Sydney South West, the AMEP is delivered by an independent provider, Navitas, who works closely with settlement services and community groups to anticipate and manage fluctuations in migrant arrival numbers. Navitas monitors registrations and assessments to plan more precisely for increases and decreases and engages with local real estate agencies to identify suitable sites in preparation for increases beyond the present capacity of their core locations.

Table 3: Case study data collection

	INTERVIEWS CONDUCTED	INDIVIDUALS INTERVIEWED	FOCUS GROUPS	FOCUS GROUP PARTICIPANTS ¹⁰
Darling Downs (Toowoomba)	11	13	4	26
Darwin	9	19	3	41
Melbourne North West	7	14	5	55
Melbourne West	6	8	6	66
Wimmera Mallee (Mildura)	10	9	3	23
Sydney South West	6	10	6	154
Perth North	8	8	3	39
Total	57	81	30	404

⁸ An eighth case study was conducted with Distance Learning students and stakeholders. This case study is discussed in section 5.4.

⁹ Learn Local providers across Victoria are supported by the Victorian Government to provide a range of education and training programs in local community settings.

¹⁰ The number of survey respondents is less than the number of participants because not all participants filled in a survey.

3.3.1 AMEP student focus groups

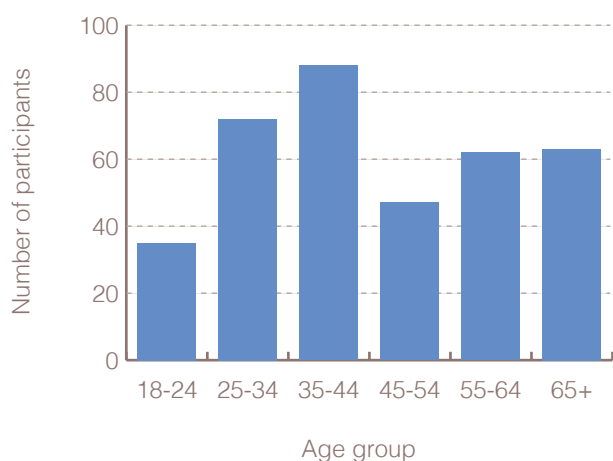
Social Compass conducted focus groups with AMEP students in each of the case study regions except for DL. Each focus group consisted of a diversity of age groups, cultural backgrounds and visa streams.

Age breakdown

The largest proportion of participants was aged 35-44 years (88 students) and the smallest age group was 18-24 years (35 students), as shown in Figure 9.

The Sydney South West case study, with 42 students between 55 and 64 years old, and 58 students aged 65 and over, best illustrated the needs of older students.

Figure 9: Focus group participants: age

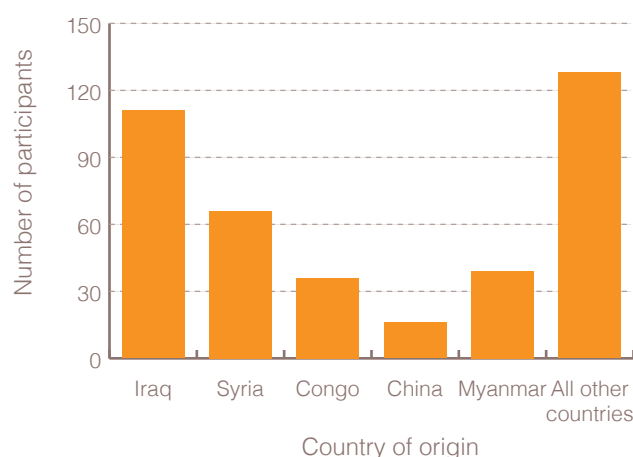


In the Wimmera Mallee case study, eight of the 22 students in focus groups were aged between 18 and 24 years old. This was the largest group of younger students to participate in the focus groups.

Country of origin

In line with the broader program demographics, Iraq and Syria were among the most highly represented countries of origin in the focus groups. Other well-represented countries of birth were Congo¹¹, China, Myanmar, Afghanistan and India. The five major countries of origin are shown in Figure 10. Overall there were 38 countries of origin represented in focus groups. Iraqi and Syrian participants were prominent in the two large focus groups in Sydney South West, as well as two focus groups in Melbourne North West.

Figure 10: Focus group participants: country of origin



¹¹ 'Congo' may include both the Republic of the Congo and the Democratic Republic of the Congo. Some participants simply wrote 'Congo' as their country of origin.

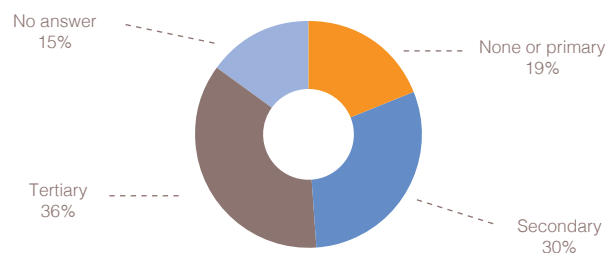
Prior levels of learning

Approximately one third (144 students, 36 per cent) of the students involved in the focus groups had participated in tertiary education prior to coming to Australia. This proportion is higher than that of the broader AMEP cohort because of the high proportion of tertiary-educated students in the large Sydney South West focus groups, where most of the students had completed tertiary education and many had significant professional experience.

Seventy-seven students had no prior education or only primary-level education. The proportions of students with various levels of prior education are shown in Figure 11.

Students with limited prior education and low literacy levels were prominent in three of the Melbourne West focus groups. There were also several students with limited literacy in the three Melbourne North West focus groups.

Figure 11: Focus group participants: level of education prior to migration

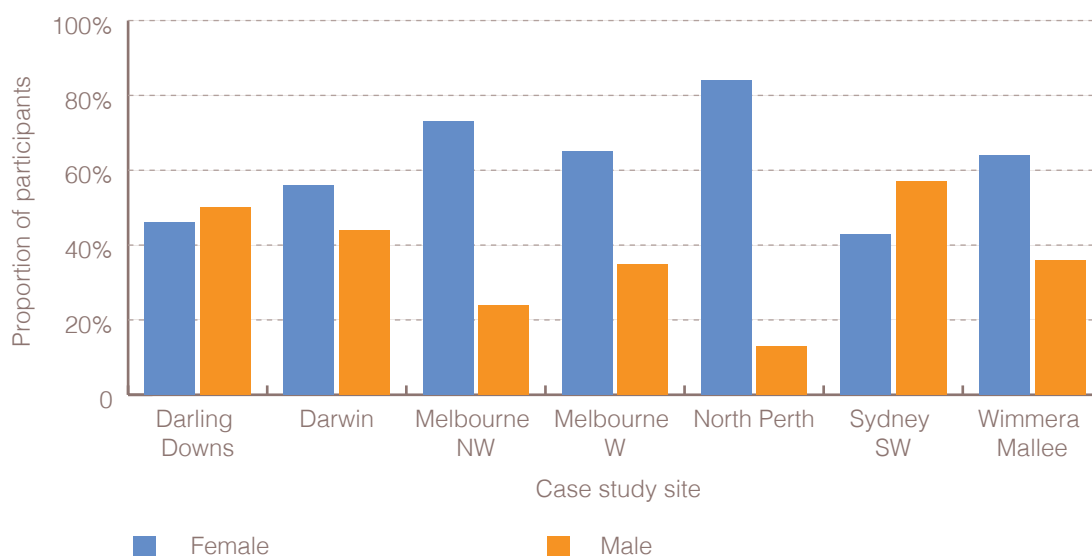


Gender of focus group participants

The gender balance of focus groups differed across case study sites, as shown in Figure 12.

Overall, 58 per cent of participants were female and 42 per cent were male. This is a slightly greater representation of men compared to the broader AMEP cohort. Since July 2013, men and women comprise 35 and 65 per cent of commencements respectively.

Figure 12: Focus group survey: proportion of male and female participants for each case study site



3.3.2 Challenges to student learning identified in the focus groups

Gendered expectations and employment

In the survey, students were asked to identify issues that they have had to address prior to beginning AMEP classes. Two hundred and four participants gave an answer to this question. Total responses for those who identified issues are shown in Figure 13.

Gendered expectations and stereotypes often prevent students from making the most of their AMEP opportunities. Cultural norms that position women as homemakers and men as breadwinners may result in women bearing a larger load of domestic duties, which can hamper their ability to participate in the AMEP. This issue was also identified in the *Building a New Life in Australia* study, which found that many women delayed the commencement of AMEP classes (Smart et al. 2017).

Results from the focus group survey reflect this gendered divide; the second most common issue women identified as a barrier to their AMEP participation was attending to family needs. Limited time to do homework was the top issue identified by women as an obstacle to their learning. Various other publications within the *Building a New Life in Australia* study identified similar issues (Jenkinson et al. 2016; De Maio et al. 2017; Smart et al. 2017). De Maio et al. (2017) also note that psychological distress was

slightly higher for women than men.

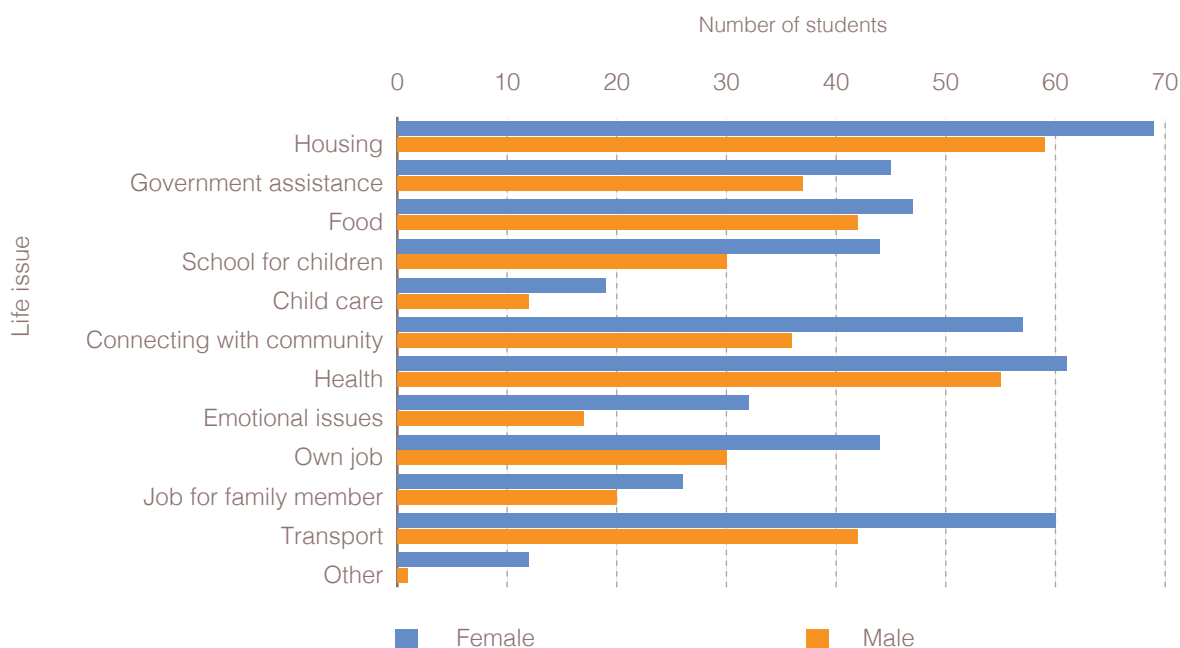
For men, the expectation to provide for the family through paid employment is a significant barrier to AMEP participation. While all students identified the need to look for work as a barrier to attending AMEP classes, this issue was more prominent in men's responses. Students and stakeholders reported a pressure on students to remit money overseas or save money to bring family members to Australia.

The issue of gendered expectations can also show geographical variations. One stakeholder in the Mildura case study identified a pattern of men forgoing English classes to undertake 'block work' on farms. Block work opportunities are set periods of low-skilled, intensive farm labour that generally do not require a high level of English language proficiency. Newly arrived migrants can have difficulty finding employment due to their low levels of English proficiency, and this type of employment is one of the few opportunities for earning money.

Age-specific needs

Low representation of youth in case study focus groups meant there was limited discussion about youth-specific needs. Nevertheless, other stakeholders repeatedly mentioned the specific needs of younger students in the AMEP. These observations are reinforced by relevant studies. For example, Harding and Wigglesworth (2005, p.11) report the need for social contact among younger migrants who

Figure 13: Focus group survey: life issues to be addressed prior to commencement in the AMEP



often feel 'a sense of social detachment' and argue that specific programs should be tailored to youth cohorts. They found that some younger students feel uncomfortable expressing themselves around older students, and feel that classes can be dominated by older students with greater learning difficulties.

Other issues specific to youth cohorts identified by the Refugee Council (Oliff 2010, p.14) include: 'disrupted education, difficulties navigating education systems, juggling settlement, education and family responsibilities' and 'developmental delays and classroom dynamics' as a result of experiences of torture and trauma.

Older students were well represented in case studies: 62 students were aged 55-64 and 63 were 65 years and above. These students reported that their language acquisition was hampered by their ability to retain new information, and that they would prefer smaller class sizes. They talked about the impact of health issues and the advantages of having people of similar age in their classes.

510-hour AMEP allocation

Only a minority of students—those with higher levels of English proficiency—thought that the 510 hours of AMEP tuition was sufficient for achieving a functional level of English. Many more students expressed a desire for an increased allocation of AMEP tuition. This was particularly important for students with the long-term goal of finding employment or pursuing further study.

3.3.3 Issues specific to visa streams

Humanitarian visa holders

For ethical reasons, students were not asked to indicate their visa type. Student responses and the insights of focus group host organisations nevertheless provided an indication of the visa types represented in each of the focus groups.

Among humanitarian migrant participants in the *Building a New Life in Australia* study, 'poor health, child care and other family caring responsibilities, and employment' were the most commonly identified barriers for newly arrived migrants not enrolling in English language classes (Smart et al. 2017).

Students on humanitarian visas in the focus groups identified these issues as barriers to their learning.

Many humanitarian migrants also suffer from health issues resulting from trauma, which impede their learning abilities and capacity to engage in classroom tuition (De Maio et al. 2017; Foundation House 2016; Jenkinson et al. 2016). Watkins, Razee & Richters (2012, p.132) found that older Karen refugee women in the AMEP with limited prior education experienced 'physical discomfort and pain from sitting in a classroom environment' but were unlikely to voice their complaints due to cultural norms of compliance, compounded by previous experiences of persecution. AMEP service providers, other stakeholders and students stressed that traumatic pre-migration experiences can continue to affect students' mental health and sense of wellbeing. The impact of poor health, including trauma, on the ability of humanitarian migrants to learn was prominent in focus group discussions.

A high proportion of humanitarian migrants within the *Building a New Life in Australia* study were found to have relatively low levels of literacy, prior education and English proficiency upon arrival in Australia (Jenkinson et al. 2016). This finding was reflected in some of the evaluation focus groups, albeit with some exceptions, namely the high proportion of students with tertiary education in the large Sydney South West focus groups.

HSP summary data from the Settlement Support Branch of the Department of Social Services indicates the range of support services provided to humanitarian visa holders since the HSP commenced on 30 October 2017. Figure 14 shows that health services are those most commonly accessed by humanitarian visa holders.

The *Building a New Life in Australia* study also identified 'high levels of housing mobility' among humanitarian migrants during their first six months of settlement (Jenkinson et al. 2016, p.4). 'Finding housing' was the most commonly identified life issue in focus group surveys. This result is supported by the HSP data shown in Table 4, which shows that approximately one quarter of eligible humanitarian clients access HSP support to find accommodation, and to renew or extend a lease.

Figure 14: HSP services accessed by AMEP students from October 2017 to December 2018

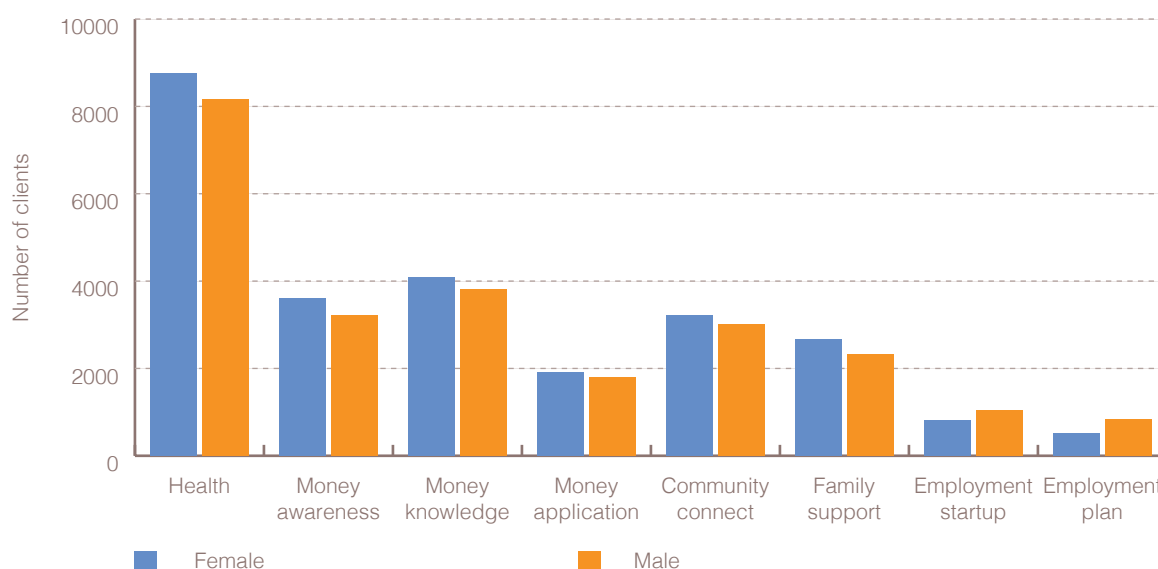


Table 4: Housing support accessed per family unit from October 2017 to December 2018

TYPE OF CLAIM	ELIGIBLE CLIENTS	NUMBER MAKING CLAIMS	PER CENT MAKING CLAIMS
Find accommodation	13320	3253	24
Renew/extend accommodation	1886	426	23

Family and partner visa holders

In both Melbourne West and Darwin, students on partner visas indicated that social isolation and uncertainty regarding visa circumstances presented challenges. Service providers and other stakeholders reinforced this perspective and also referred to dependence on partners and family violence as potential issues for this group.

In terms of partner visas – family stream there is an issue of isolation. ...I think they're very isolated from communities and they're completely reliant on their partners for information about Australia, and what they tell them is not always accurate. It can be very controlling – and a lot of them aren't sure about their visas.

—Community organisation

The National Plan to Reduce Violence against Women and their Children (2016) has identified women from culturally and linguistically diverse communities as a group that is particularly vulnerable to family violence. While female students themselves did not openly talk about family violence, they did report social isolation and dependence on their partners.

Skilled visa holders

No specific issues were identified among the focus groups for skilled visa holder students.

3.3.4 Factors enabling student achievement and engagement in the AMEP

Classroom environment

The classroom environment is a key factor determining student learning and successful settlement. Students valued extracurricular activities such as excursions and incursions. Students appreciated small classes consisting of students of similar levels of English proficiency.

Students indicated that classes consisting of students from different language groups and countries facilitated their learning. A classroom environment where English is the only common language serves to accelerate student learning. Learning about students from other countries made the process of language acquisition easier and more enjoyable.

In our class, one or two day we have conversation and if we talk classmates every time we have a lot of confidence to speak other people and speak communication very confident. And in our classes we have a lot of different countries – I think 12 or more than 12 countries – we learn about their culture and food and many things we have learn here.

—AMEP student

AMEP teachers

The importance of appropriately qualified teachers in migrant language tuition has been well documented (ACIL Allen 2015; CIC 2010 Schaetzel & Young 2010; Derwing et al. 2009). Across the case study sites, students emphasised the central role of their teachers. Students in all focus groups described the ways in which teachers built strong and supportive relationships with students. This helped foster student confidence both in terms of their English language ability and wider social engagement.

The main factors that are helping in our journey are the good teachers – we have excellent teachers and the ability to speak with the teacher and converse with teachers in English.

—AMEP student

Access to transport

Assistance accessing public transport has been identified as an element of best practice with respect to migrant language education delivery (CIC 2010 Schaetzel & Young 2010, cited in ACIL Allen 2015a).

In the case studies, most students travelled to the AMEP classes by public transport. In the metropolitan areas, a major issue identified was the amount of time taken commuting to class.

I come here by bus, bus only comes every half an hour, if I miss the bus I am late, not enough buses.

—AMEP student

In regional and rural areas, students spoke of walking for 45-50 minutes to get to their classes.

Transport is not easy – if you want to walk you can – but it takes 50 minutes.

—AMEP student

Access to child care

Provision of child care has also been acknowledged as an element of best practice in migrant language education delivery (CIC 2010 Schaetzel & Young 2010, cited in ACIL Allen 2015a). This was reiterated throughout the case studies, where students with children, particularly women and single parents, regarded child care as an important factor enabling their English learning. Without access to child care, it would have been difficult (and in some cases not possible) for these students to pursue their AMEP studies.

Student goals and perceptions of progress

Student motivation and commitment to learning English was evident across all focus groups. Students identified improved social connectedness, independence, employment, ability to express themselves and further studies as important goals. These aspirations align with those identified in the Yates et al. (2015) AMEP longitudinal study and the *Building a New Life in Australia* study (Smart et al. 2017).

Benefits of the AMEP identified by students included improved English proficiency and sense of self confidence, increased independence in daily life, and opportunities to establish social connections. These outcomes were common across all case studies.

Because I have learned English I could learn to drive; I was illiterate in my own language; I learned numbers, telephone numbers. I could not read or write in my own language or English. I am now using it in my day to day life. I am able to take my kids to school and bring them back. I do my own shopping I am very happy with the government for helping us with that.

—AMEP student

AMEP student focus group participants were also asked to compare their level of English prior to commencing AMEP classes with their current ability. Figure 15 shows improvements in student perceptions of their English proficiency from low levels such as ‘no English’ or ‘a few words’ to higher levels of proficiency such as ‘being able to hold a conversation’, ‘seek employment’ or becoming ‘fluent’.

Students were also asked to compare their confidence levels before and after participating in the AMEP. Figure 16 shows the student responses, illustrating substantial increases in student confidence levels.

Figure 15: Focus group survey: current and pre-AMEP English proficiency levels

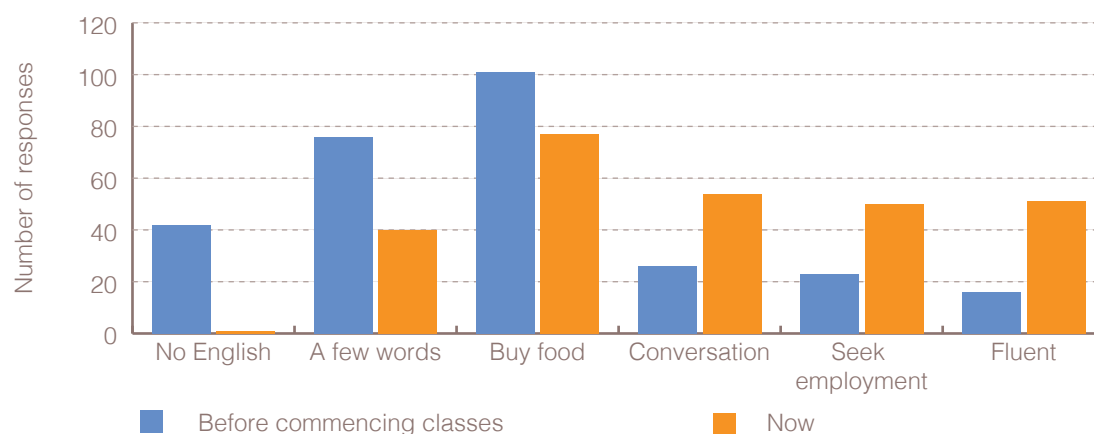
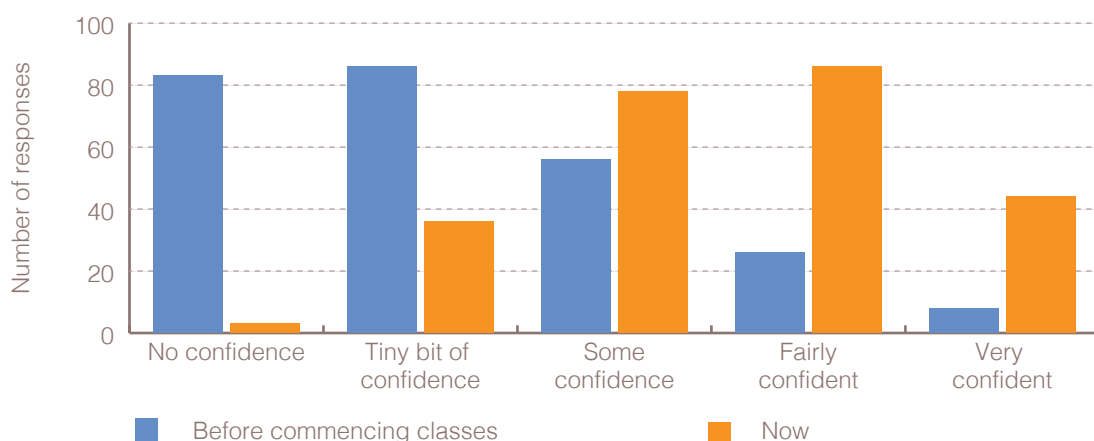


Figure 16: Focus group survey: current and pre-AMEP confidence levels



3.4 The Adult Migrant English Program today: summary

The AMEP provides an opportunity for eligible migrants and humanitarian entrants to Australia to learn English and strengthens the foundation for their settlement in Australia. This supports their social and economic participation in Australian society. All stakeholders that participated in this evaluation acknowledged the significance of the AMEP.

The AMEP caters for students from 197 different countries, speaking 267 languages. Family visa holders consistently represent the highest proportion of AMEP commencements. Humanitarian migrants are another significant group of AMEP student, with over half of all humanitarian migrants that come to Australia (52 per cent) participating in AMEP. Around one quarter of eligible family visa holders and a small percentage (less than 4 per cent) of eligible skilled migrants enrol in the AMEP. The largest age group of migrants commencing during the period 2013–19 was 25 to 44 years.

The AMEP service providers reported numerous examples of flexibility in delivering tuition, catering to student needs, engagement with broader community services and targeted classes for specific levels of English proficiency or particular age groups.

AMEP students frequently expressed their gratitude to the Australian Government for providing them with the opportunity to learn and improve their English language skills. They spoke of the positive outcomes they achieved as a result of their participation in the

AMEP—improvements in their English proficiency, increased self-confidence and independence in daily life, and establishing social connections. However, only a minority of students—who already had higher levels of English proficiency—thought that the 510 hours of AMEP tuition was sufficient for achieving a functional level of English.

Students identified challenges that affect their capability to learn and participate in the AMEP, including gendered expectations and the need to find employment. There were also a number of challenges specific to particular age groups and visa streams. The impact of poor health, including trauma, on the ability of humanitarian migrants to learn was prominent.

Students acknowledged the AMEP teachers as the single most important factor that supported their learning. Other critical factors were the class environment, access to child care and transport, as well as their own motivation and commitment.

The AMEP teachers expressed their commitment to facilitating student learning. As evident in student accounts, often support from teachers extends beyond teaching English to include practical and emotional support.

The AMEP continues to be a vital program that has been a cornerstone of immigration policy since 1948. The opportunity and support it provides for eligible migrants and humanitarian entrants to learn and improve their English is critical to their ability to participate socially and economically in Australian society.

OVERARCHING RECOMMENDATIONS TO IMPROVE DEPARTMENTAL STRATEGIC CAPABILITY

The new business model (NBM) introduced a suite of changes to the Adult Migrant English Program (AMEP). While some of these changes were well received, others were not. Stakeholders, particularly AMEP teachers, reported increased workload, inefficiencies, confusion and decreased wellbeing. While organisational change is always difficult, some of the negative consequences of the NBM may have been avoided by better consultation and implementation processes throughout the transition to the NBM.

Each of the NBM changes is discussed in turn below, alongside recommendations. First, however, the evaluation makes two overarching recommendations which will assist the department to manage future changes to the program with a minimum of disruption.

4.1 An AMEP Advisory Committee is needed to oversee change and innovation

The implementation of the NBM has met with strategic, structural and operational challenges. With better expert advisory structures, some major challenges and unintended consequences of implementation may have been avoided. Organisational change literature argues that the active engagement of staff delivering programs is central to effective program redesign (Deci, Olafsen

& Ryan 2017; Robertson & Wagner 2012; Senge 1990). In the context of the AMEP, continuous improvement strategies should make use of the expertise of AMEP teachers and service providers, who are at the forefront of program delivery. These key stakeholders know most about the realities of teaching English to migrants in Australia and should be involved in the ongoing design of the AMEP. An AMEP Advisory Committee that includes teachers and service provider representatives is needed to oversee and facilitate change in this important and long-standing program. This Advisory Committee should also include representatives from organisations and government departments that support migrant settlement in Australia.

This report identifies instances where recent changes to the AMEP have caused controversy and discord among stakeholders. Key stakeholders need to be consulted prior to fundamental changes to program structure and practices. Consultation will allow the department to consider the unique perspectives and priorities of those who deliver the AMEP. Teachers should have the opportunity to respond to proposed changes to processes, teaching practices and program structure before these changes are implemented nationally. An AMEP Advisory Committee would enhance the consultation capacity of the department by contributing the expertise of its members and overseeing broader consultation processes across the program.

Recommendation – Creation of an AMEP Advisory Committee

The department should establish an AMEP Advisory Committee, representing all key stakeholders, to oversee change, innovation and continuous improvement in the AMEP.

Membership of the AMEP Advisory Committee might include:¹²

- service providers (aiming for a balance of not-for-profit, independent and TAFE representatives)
- AMEP teachers (nominated by state/territory Teaching English to Speakers of Other Languages (TESOL) associations)
- a recent male and female AMEP graduate
- inter-departmental bureaucratic expertise (positions suggested based on Senior Officers Settlement Outcomes Group (SOSOG) membership)
- peak bodies (including Federation of Ethnic Communities' Council of Australia (FECCA), Settlement Council of Australia (SCoA), and the Australian Council of TESOL Associations (ACTA)).

4.2 The need for a comprehensive Information Management System

The implementation of several elements of the NBM was hindered by the absence of an information management system (IMS) capable of accommodating the changes to the program. During the consultation period of the evaluation a new IMS was in development, but interim arrangements have been complex and cumbersome. To adapt to new data collection and reporting requirements, the department supplemented the existing AMEP Reporting and Management System (ARMS) with a system of spreadsheets. This interim solution has increased workloads for the department and service providers.

Recommendation – Information Management System

The department should prioritise the development of a robust information management system (IMS) to manage the AMEP. The new IMS should streamline:

- *collection of client information and attendance records by both AMEP and child care providers*
- *reporting of student progress*
- *monitoring of student use of their 510 and supplementary hours.*

It should also be used to centralise volunteer tutor information.

¹² The evaluation Advisory Committee discussed this proposed membership and provided in-principle support.

ADULT MIGRANT ENGLISH PROGRAM AND SUBPROGRAMS

5.1 Special Preparatory Program

5.1.1 Introduction

Adult Migrant English Program (AMEP) students have a legislated entitlement to 510 hours of English language tuition. The Special Preparatory Program (SPP) provides refugee and humanitarian entrants with additional hours of English language tuition in the AMEP. It recognises that migrants on humanitarian visas often require extra learning support because of difficult pre-migration experiences, including torture or trauma, and/or limited prior schooling.

The SPP was first funded in 1997, and offered eligible refugee and humanitarian entrants access to an additional 100 hours of AMEP tuition (Martin 1998, p.69). In 2004 the SPP was expanded to allow 400 additional hours of AMEP tuition to humanitarian entrants between 16 and 24 years of age who had less than seven years of schooling (DIMIA 2003, ch.11). These entitlements are summarised in Table 5.

Table 5: Special Preparatory Program entitlement

STUDENT AGE	NUMBER OF YEARS OF SCHOOLING	NUMBER OF ADDITIONAL HOURS
Under 25 years	8 years or more	100
Under 25 years	7 years or less	400
25 years and over	Any	100

Prior to the new business model (NBM), the SPP budget was capped as follows:

- \$17.07 million in 2014-15
- \$27.34 million in 2015-16
- \$28.07 million in 2016-17.

The higher caps between 2015 and 2017 were designed to accommodate the additional 12 000 Syrian and Iraqi humanitarian migrants that entered Australia during this period. Expenditure on SPP did not reach the budget cap in any year.

Under the previous contract, SPP classes were limited to a maximum of 12 students per class. The smaller SPP class sizes were accounted for in service providers' SPP-specific tuition fee. The average hourly rate for the SPP was \$32.51, approximately 40 per cent higher than the average hourly rate for AMEP general tuition at \$23.24.

The NBM has introduced the following changes to the SPP:

- removal of the funding cap that was previously applied to the SPP
- removal of the requirement to prove 'difficult pre-migration experiences' to access the subprogram
- removal of the requirement for smaller classes for SPP students
- introduction of standardised hourly fees across AMEP and its subprograms, thereby abolishing the separate fee for SPP provision.

5.1.2 The benefits of uncapping the SPP

The proportion of AMEP students on humanitarian visas who accessed SPP was 95 per cent in 2013-14 and 92 per cent in 2013-14. The proportion decreased in subsequent years to 66 per cent in 2016-17 as the large intake of additional humanitarian entrants from Syria and Iraq settled in Australia.

The decrease in the proportion of humanitarian entrants accessing the SPP between 2015 and 2017 may be partly explained by the relatively high education and literacy levels of the Syrian and Iraqi cohort. This group might have had less need of the additional support provided by SPP. The scale of this intake, 12 000 additional humanitarian entrants within a two-year period, may have also stretched service provider capacity to respond to the increased number of migrants eligible for the SPP.

The removal of the budget cap coincided with a return to a more typical number of humanitarian entrant enrolments in the AMEP, as the Syrian and Iraqi cohort passed through the program. It also coincided with an increase in the percentage of SPP uptake by these students. The SPP uptake almost returned to 2013-14 levels in 2018-19. This proportional increase in SPP participation is partly the intended result of the removal of the eligibility requirement to prove difficult pre-migration experiences. The removal of this requirement has also eliminated for providers the task of determining which students have the greatest need of the SPP.

Figure 17 shows the total number of students participating in SPP from July 2013 until the present.

In submissions and interviews, 13 of 15 service providers stated that uncapping the SPP was a positive element of the NBM. Six of those service providers explicitly stated that access to extra hours benefit students with difficult pre-migration experiences who need more time to learn English. In the stakeholder pre-interview survey, 88 per cent of AMEP managers and 83 per cent of AMEP coordinators, administrators and other stakeholders were either positive or highly positive about this change. Five of the seven government stakeholders and five of the 12 community organisations who made submissions also identified uncapping the SPP as a positive change. No submission referred to the uncapping of the SPP as a negative development.

The greatest benefit of this sub-program is the recognition of learning needs of clients, taking into account factors such as disruptions in education or lack of access to education that are inherent in the experiences of Humanitarian Entrants. In doing so, it allows our students who access SPP to settle into class better and strengthen their learning experience and skills which leads to better long-term settlement outcomes.

—AMEP service provider

Figure 17: Uptake of SPP by humanitarian visa holders

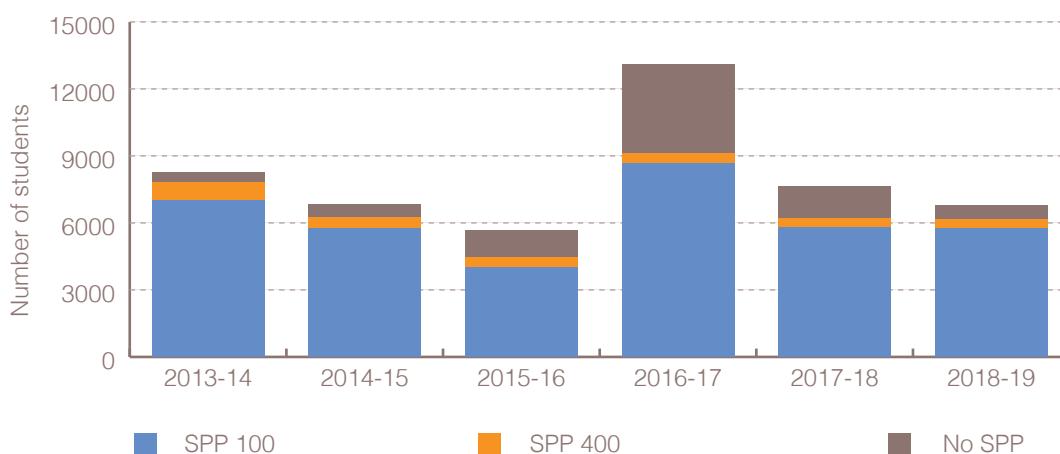
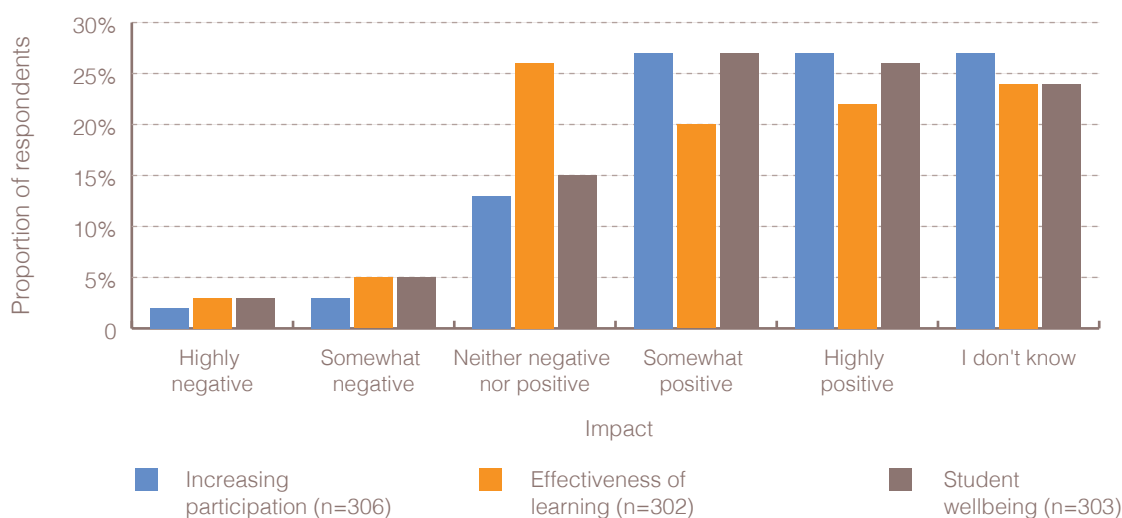


Figure 18: Teacher survey: impact of uncapping the SPP on student participation, effectiveness of learning and student wellbeing



Teacher interviews and surveys also revealed a predominantly positive response. Figure 18 illustrates teacher perceptions of the impact of uncapping the SPP in terms of student participation, learning outcomes and wellbeing. Over half of the surveyed teachers identified the uncapping as somewhat or highly positive for increasing student participation and wellbeing. Forty-two per cent considered that it had a positive impact on effectiveness of learning.

Key finding:

Service providers and other stakeholders support uncapping the Special Preparatory Program.

Program data shows that, on average, migrants on humanitarian visas who participate in the SPP go on to use more of their 510 hours.¹³ The greater usage of core AMEP hours by SPP students might reflect the amount of time they need to learn English, or it might indicate that participation in SPP provides a good foundation for further AMEP participation.

Analysis of program data under the previous contract shows that, at a program level, SPP appears to be contributing towards improvements in language learning outcomes for humanitarian migrants. This suggests that the extra SPP hours for humanitarian students are sufficient to ensure they progress to the same extent as the other two visa streams (see Appendix A).

In summary, the SPP continues to play an important role in supporting humanitarian clients in their engagement with the AMEP. In uncapping the SPP funding and opening the program to all humanitarian entrants, the Australian Government has recognised the effects of pre-migration experiences for this cohort and acknowledged that they require additional settlement support.

Recommendation – Special Preparatory Program

The Special Preparatory Program should remain uncapped and available to all AMEP humanitarian entrants.

¹³ In 2017-18, SPP students used, on average, 34 more hours of their 510-hour entitlement than non-SPP humanitarian visa holders.

5.1.3 SPP students require more tailored and flexible language tuition

The special learning needs of humanitarian entrants remain as pronounced now as they were when the SPP subprogram was established. In a report from the *Building a New Life in Australia* longitudinal study of humanitarian migrants, Smart et al. (2017, p.1) noted that 15 per cent had no formal education and a further 18 per cent had six or fewer years of schooling.

Of the humanitarian migrants participating in the *Building a New Life in Australia* study, 35 per cent of men and 45 per cent of women presented moderate to high risk of psychological distress in the three to six-month period after arrival or the granting of a permanent visa (Jenkinson et al. 2016, p.5; De Maio et al. 2017, p.1). Approximately two years after arrival/granting of visa, 16 per cent were still classified as moderate or high risk, demonstrating the persistence of psychological distress over time (De Maio et al. 2017, p.1).

In its submission to this evaluation, the NSW Service for the Treatment and Rehabilitation of Torture and Trauma Survivors (STARTTS) outlined the impact of psychological stress on the learning capacities of migrants.

While the suite of symptoms aligned with the construct of Post-Traumatic Stress [...] tend to be well recognized, the impact of trauma and the stresses of migration [...] on other areas of brain functioning, notably attention and memory systems is often overlooked. Since the resettlement process as a whole, and English language acquisition in particular, are heavily reliant on learning and processing new information, the impact of trauma on cognitive capacity has significant implications for the achievement of key English acquisition milestones leading to success in the employment area.

—STARTTS submission

The Darling Downs case study illustrates the impact of trauma on student learning. Adult humanitarian students from this region reported that they need more than 510 hours of English tuition because they have difficulty maintaining their concentration in AMEP classes, and have ‘a lot of things on their mind’. They also indicated that they need more timetabling flexibility to access their tuition at a slower rate. Many of these students expressed a preference for fewer classes per week, or fewer hours per day. They reported that they can maintain concentration for the first one to two hours of class, but that they struggle for the remainder of the day.

The Melbourne West case study illustrates the difficulties that both young and adult students with low or no schooling in their country of origin face as they attempt to learn English. Students reported that they need more time to understand ideas, grammar and concepts. These students wanted slower-paced classes, more visual material and in-class tutors. In Sydney South West, the two focus groups of older humanitarian students reported similar needs. As one student clearly articulated:

I came to Australia from jungle. I have never had a pen in my hand. I want to learn but you need to teach me slowly. We are all older students. We cannot remember everything. You need to go slowly with us. We need a lot of repetition.

—AMEP student

These case study examples show that students who have had difficult pre-migration experiences, or who have had limited access to education, often require language tuition that is tailored to their needs.

5.1.4 Changes to the SPP have resulted in larger classes that are less sensitive to the needs of SPP students

In its 2015 AMEP evaluation, ACIL Allen found that the SPP was a highly valued program that was ‘seen as providing additional and well-structured training to a high needs client group’. ACIL Allen also noted that the mandated small class sizes for SPP students had been accepted by service providers and, overall, the SPP aligned with good practice in program delivery for this cohort (ACIL Allen 2015a, p.46).

The mandated small class size for SPP students has been removed under the NBM. A number of stakeholders indicated that the removal of the 12-person limit on class size, along with the removal of the SPP-specific fee, has resulted in a decrease of the individualised support and tailored learning opportunities for this cohort.

Two submissions from community organisations expressed concern about the removal of the requirement for smaller class sizes for SPP students. They felt that the vulnerable SPP cohort needed the support that smaller classes can provide. Two service providers echoed this view.

[Name of community organisation] is concerned with regards to the class sizes, in particular in the SPP. We are concerned that larger class sizes will compromise the quality of the program, especially as this group of students are particularly vulnerable and need additional support in small classes.

—Community organisation

Three service providers and the Australian Council of TESOL¹⁴ Associations (ACTA) stated that SPP students benefit from being in classes that are separate from the mainstream AMEP. These providers felt that changes to the SPP under the NBM were making it more likely that service providers place SPP and mainstream AMEP students in the same classes.

Where Centres contain SPP400 students (and possibly SPP100 students) but do not offer separate SPP classes, designating their extra hours as ‘a preparatory program’ is a fiction, since these students are in regular AMEP classes.

—ACTA submission

To be able to afford smaller classes under the standardised fee in the current contract, service providers needed to build an appropriate loading into their hourly rate that applies to the 510-hour AMEP, SPP, AMEP Extend and the Settlement Language Pathways to Employment and Training (SLPET). The evaluation Advisory Committee indicated that the competitive tender environment, with cost as a key criterion, discouraged service providers from doing this.

Service providers supplied information regarding class size and makeup for SPP students under the NBM. Across the whole program there are only five SPP-specific classes, provided by four of the larger service providers, and only one of these had 12 or fewer students. All other SPP students were in regular AMEP classes. Therefore, for most students, SPP is an allocation of extra hours rather than a specialised program.

This information provides strong evidence that the changes in the funding model to a single hourly rate for all AMEP programs has influenced provider behaviour regarding the SPP. Service providers did not allow a sufficient margin for the additional costs of specialised classes for SPP students.

Key finding:

The removal of the cap on maximum class size and the removal of the higher SPP pricing has resulted in larger class sizes and almost no specialised classes for SPP students.

Suggestions for addressing this issue are found in the funding model recommendation in section 9.4.

¹⁴ Teaching English to Speakers of Other Languages

5.2 Additional tuition hours (AMEP Extend)

5.2.1 Introduction

Since January 1993, Adult Migrant English Program (AMEP) students have had a legislated entitlement to 510 hours of language tuition (Martin 1998, pp.31-32). Prior to the new business model (NBM), the AMEP offered an additional 100 to 400 hours of tuition to humanitarian entrants under the Special Preparatory Program (SPP) subprogram and up to an additional 200 hours under the Settlement Language Pathways to Employment and Training (SLPET) subprogram.

Under the 2017 NBM, the Australian Government introduced AMEP Extend: a capped subprogram with funding of approximately \$4 million per year. The subprogram offers up to 490 hours of additional English language tuition to students who are due to complete their 510 hours without attaining their language proficiency goals or reaching functional English.

The introduction of AMEP Extend reflects recognition by the government that committed students who have used their 510 hours are more likely to achieve successful settlement and sustainable employment if they have access to extra English language tuition.

The budget that the department allocates to each service provider is based on the estimated number of clients who would be eligible for AMEP Extend in the upcoming financial year. Service providers give information about the number of hours each potential client is expected to use and their attendance rates. The department monitors AMEP Extend expenditure and reallocates unspent funding to service providers via a mid-year review process. The department estimates that approximately 1000 students per year are eligible for AMEP Extend. There is only sufficient funding for the full 490 hours for one third of these eligible students.

To be considered eligible for AMEP Extend,¹⁵ a student must have:

- less than functional English
- fewer than 10 hours of their core AMEP entitlement remaining
- demonstrated good progress during their AMEP participation
- demonstrated good attendance patterns and have a consistent attendance record
- the ability to undertake their AMEP Extend tuition without extended absences (any period over three months).

Table 6 shows the breakdown by visa stream, years of schooling, age group and gender, of students accessing AMEP Extend between July 2017 and December 2018. On average, AMEP Extend students spend 103 hours in the subprogram. Clients are more likely to be women, family visa holders, aged between 25-44 years, and have more than 12 years of prior schooling.

Table 6: Usage of AMEP Extend July 2017 to December 2018

	CATEGORY	NUMBER OF STUDENTS	AVERAGE HOURS
Visa stream	Family	1004	103
	Humanitarian	584	105
	Skilled	290	98
Years of schooling	0-7	298	100
	8-11	431	106
	12+	1149	102
Age group	<18	9	125
	18-24	290	117
	25-34	593	102
	35-44	432	97
	45-54	309	97
	55-64	172	108
	65+	73	99
Gender	Male	606	103
	Female	1272	103
Overall		1878	103

¹⁵ The AMEP Extend eligibility requirements were amended in April 2018. The requirements, as set out here, are less prescriptive than they were at the commencement of the contract and service providers have more discretion (Australian Government, AMEP – Service Provider Instructions (2017-2020) version 4, 2018, p. 35).

5.2.2 The need and demand for additional tuition hours

There is very little consensus on the number of hours students require to learn a new language. The Welsh English as a Second or Other Language (ESOL) strategy cites an estimation of ‘1765 guided learning hours’ as the average time taken ‘to progress from pure beginner level to a point where they could undertake study of another subject or take on a job with routine communication requirements.’ In 2017, the Parliament of Australia’s Joint Standing Committee on Migration expressed concern about the focus in the AMEP on delivering a specific number of hours of English tuition. They recommended that the focus should be on language competency and outcomes for migrants rather than time spent in the program (Joint Standing Committee on Migration 2017, p.57).

The Certificates in Spoken and Written English (CSWE) is the curriculum used by the majority of AMEP service providers. The CSWE course requirements outline the number of hours, both supervised and unsupervised, that it expects students will require to complete each certificate level. For any level except preliminary, the lower limit of expected hours required to gain a certificate is more than 510. Progress from total beginner to completion of Certificate III (the highest level obtainable in the AMEP) is expected to take between 1415 and 2430 supervised hours.

5.2.3 AMEP Extend has been welcomed by stakeholders

In interviews and submissions, 12 of 15 AMEP service providers and subcontractors explicitly welcomed the introduction of AMEP Extend. They cited two main benefits of the subprogram. First, students generally require more than 510 hours of tuition to achieve functional English. Students with low level English at commencement, and particularly those with low literacy levels in their own language/s, typically take longer to learn English. Access to additional hours assists them to improve their English.

Our experience is that 510 hours is generally not sufficient for clients with lower or intermediate levels of English proficiency to reach functional English, obtain sustainable employment or undertake further study. Where clients have been able to access AMEP Extend, the additional tuition has improved their language skills and thereby greatly enhanced their ability to enter SLPET, vocational courses, the SEE program and/or sustainable employment.

— AMEP service provider

One service provider noted that AMEP Extend is particularly important for those students who will not be able to access English tuition after completing their AMEP entitlement. This is the case, for example, for students with child care commitments, as other programs do not provide free child care.

Table 7: Hours required to complete CSWE certificates

CSWE LEVEL	SUPERVISED HOURS	UNSUPERVISED HOURS	TOTAL HOURS
Preliminary	210-660	n/a	210-660
Certificate I	400-540	150	550-690
Certificate II	435-600	175	610-775
Certificate III	370-630	700	1070-1330
Total	1415-2430	1025	2440-3455

The second main benefit of AMEP Extend, according to service providers, is that it has allowed students who have exhausted their 510 hours more time to reach a learning milestone. Program data does not specifically link AMEP Extend hours with the completion of all these milestones, so Social Compass asked the 13 principal service providers to specify the student goals they chose to support when allocating AMEP Extend hours. The reasons given varied across service providers. The main reasons included:

- to allow the student to continue classes until the end of term
- to support the student to move closer to functional English
- to support the student to complete a curriculum certificate
- to support the student to reach an Australian Core Skills Framework (ACSF) indicator.

The teacher survey revealed very strong support for AMEP Extend. Figure 19 shows that 69 per cent of respondents felt that it had a somewhat or highly positive impact on effectiveness of learning. More than 75 per cent of teachers considered that AMEP Extend has had a somewhat or highly positive impact in terms of increasing participation and student wellbeing.

The Australian Council of TESOL¹⁶ Associations (ACTA), five community organisations and four government agencies also stated in their submissions to this evaluation that AMEP Extend is a welcome step towards supporting migrants.

Key finding:

AMEP Extend has been welcomed by all stakeholders.

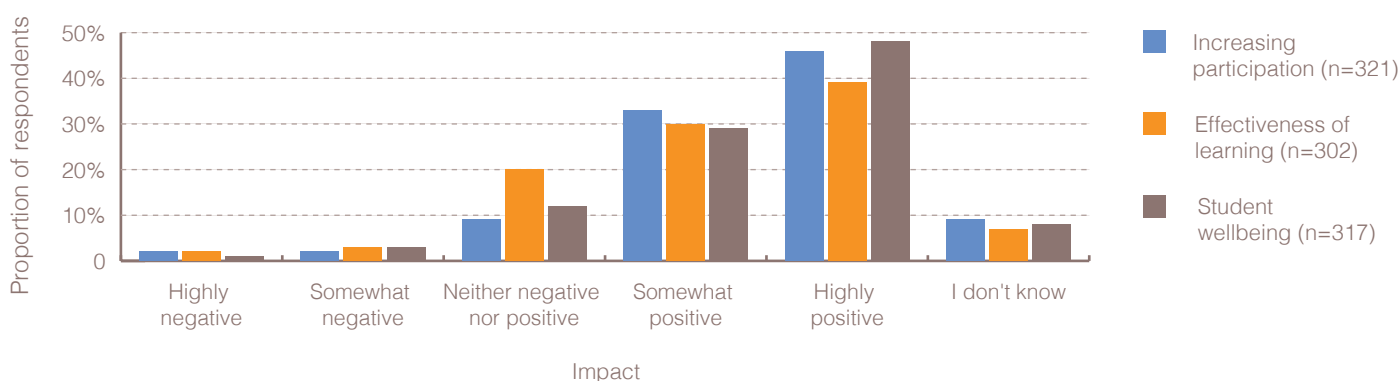
5.2.4 AMEP Extend supports students to progress further

AMEP program data shows that AMEP Extend students have, on average, progressed by more levels across the eight ACSF indicators than non-AMEP Extend students.¹⁷ The greater progress of the AMEP Extend students is explained by their access to more tuition hours, but also by the fact that eligibility for the program is determined by their previous progress and attendance in the AMEP.

On average, AMEP Extend students enrolled since the commencement of the NBM have progressed by 4.0 ACSF levels. Students who enrolled in the same period who did not access AMEP Extend progressed by 2.4 levels on average.

The progress achieved by AMEP Extend students is similar across the different visa streams, with humanitarian visa holders making the most progress (4.6 levels) followed by family visa holders (3.8 levels) and skilled visa holders (3.7 levels). The extra progress made by students holding humanitarian visas is partly explained by their having access to additional hours of tuition through the SPP.

Figure 19: Teacher survey: impact of AMEP Extend



¹⁶ Teaching English to Speakers of Other Languages

¹⁷ Under the NBM, student initial and progress assessments are reported using the ACSF. Student progress in the AMEP is described using eight indicators: two each for the skills of reading, writing, learning and oral communication. For each indicator, a student can progress zero to five levels: from Pre Level 1 A and B through Levels 1 to 3. For the purposes of this evaluation, student progress is calculated by adding the number of levels a student has advanced across all indicators on which they have been assessed during their time in the AMEP. A student who has progressed by two levels may have advanced by one level in two indicators, or they may have advanced by two levels on one indicator.

5.2.5 Challenges associated with AMEP Extend

The principal criticism made of AMEP Extend by service providers is that their budget is insufficient. Ten of 15 service providers and subcontractors stated that student demand for additional hours exceeded their allocated budget. Eleven of those providers, three community organisations and one government agency explicitly recommended that the budget for the subprogram either be significantly increased or uncapped.

Two service providers reported that, to maximise the number of students accessing AMEP Extend, they divided the maximum of 490 hours between multiple students. It is likely that most service providers use this technique, as program data shows that in the period July 2017 to December 2018, students accessing the AMEP Extend had undertaken an average of 103 additional hours (see Table 6 above). It is probable that the majority of these students would have welcomed additional AMEP Extend hours up to the 490 hours limit. The rationing applied by service providers is evidence of substantial unmet demand.

On the other hand, departmental data shows that uptake of the program was well below the funding cap in 2017-18, when only 62 per cent of the capped funding was expended. As of 30 April 2019, 79 per cent of the capped funding for 2018-19 was expended. The discrepancy between service provider reports of insufficient funding and departmental evidence of underspending may be explained by program and contract implementation issues during 2017-18, which resulted in service providers prioritising re-enrolment of students and building their core 510-hour AMEP classes. The discrepancy may also be explained by an initially cautious approach

from service providers in their allocation of AMEP Extend hours due to their limited funds. One service provider reported that,

when we were given our allocation for the first year [...] we were too conservative and worried about expending it. Unfortunately in the second year that meant that the department reduced our capped amount.

—AMEP service provider

Another way to test for unmet demand is to examine the extent to which learning progress fostered by AMEP Extend has contributed to students achieving functional English. According to departmental program data, no student completing their AMEP Extend allocation has reached functional English. Functional English is defined as having achieved Level 3 proficiency for the four ACSF core skills of learning, reading, writing and oral communication. According to departmental program data, no student completing their AMEP Extend allocation has reached functional English. Under the NBM, however, 172 students (21 per cent) that accessed AMEP Extend reached an average ACSF Level 2 or more and 15 students (two per cent) reached an average ACSF Level 3 or more.¹⁸

Funding constraints prevent service providers from allocating AMEP Extend hours to all eligible students. The selection process, based on the criteria outlined above, can seem unfair to students. In four focus groups in four different case study locations, students spoke of their perception of unfairness.

When I nearly finish my hours and I have a meeting with her and then I asked her can I have more Extend hours, but she said no we couldn't. But when I talked to my friend he had same situation as me but he can get more Extend hour.

—AMEP student

¹⁸ Average ACSF level is determined by averaging a student's eight ACSF indicator levels.

Two service providers also reported student perceptions of unfairness regarding the allocation of AMEP Extend hours. One of these service providers reported a reluctance to promote AMEP Extend because students were unhappy if they missed out on accessing AMEP Extend hours while their classmates had been successful.

Six service providers also reported that the absence of an information management system (IMS) made it difficult to assess student eligibility for AMEP Extend. In particular, the complexity of tracking how many hours of their 510 hours a student has used makes it challenging to identify when they are in the last ten hours of their entitlement. This is a limitation of the current system which would be remedied by a new IMS.

Three service providers pointed out to Social Compass that the child care costs associated with AMEP Extend further limit an already constrained budget. Several students indicated to Social Compass that they had missed out on accessing AMEP Extend because their service provider did not have sufficient funding to provide both AMEP Extend tuition hours and the requisite child care. The Advisory Committee confirmed that this situation could indeed occur if the AMEP Extend budget had diminished to the point where the cost of providing tuition plus child care for a given student was greater than the remaining budget.

Child care expenditure accounts for 17 per cent of the Extend budget, the same percentage as child care expenditure in the core 510-hour AMEP. The department advises that all ancillary services, such as child care and tutors, associated with an AMEP subprogram must be funded from the budget for that subprogram. Therefore all child care associated with AMEP Extend must be funded from within the AMEP Extend funding cap.

Key finding:

The funding allocated to AMEP Extend is insufficient to meet demand.

Recommendation – AMEP Extend

The government should increase AMEP Extend funding to better meet demand.

5.3 Targeted Tuition Streams

5.3.1 Introduction

Prior to the new business model (NBM) implementation in July 2017, there was a single English language stream for most students in the Adult Migrant English Program (AMEP). The exceptions were the Special Preparatory Program (SPP) and Settlement Language Pathways to Employment and Training (SLPET) subprograms for eligible students.

In its 2015 evaluation, ACIL Allen found that although most AMEP service providers were able to implement a variety of teaching approaches, there were concerns that the AMEP did not have sufficient cohort-specific classes (ACIL Allen 2015a, pp.93-94).

The NBM introduced streamed tuition to the AMEP with the aim of providing more tailored services to meet student needs. The two streams, Pre-Employment English and Social English, reflect the government's recognition that many students are seeking sustainable employment and would benefit from a stronger employment focus in their AMEP classes, while others are prioritising settlement in Australia and social participation within their community.

Pre-Employment English is for those students who wish to participate in the workplace or further training and is mandatory for those referred to the AMEP by an employment services provider. Classes deliver accredited training and cover the skills of reading, writing, listening and speaking.

Social English is for those students who want to improve their conversational English in order to participate and live independently within their community. Classes deliver accredited or non-accredited training and focus on speaking and listening. The department expected the majority of the Social English cohort to be aged 55 and over.

Table 8 outlines the different requirements for delivering each stream. Social English has a larger maximum class size, and less stringent teacher qualifications and curricula requirements than Pre-Employment English.

The tender process for the current contract separated the fee for the two streams; the fee charged by providers for Social English is generally lower than for Pre-Employment English. Departmental data shows that, on average, the difference in the price charged for the two streams is \$1.59 per student per hour. The maximum difference is \$7.80. Some service providers do not charge separate prices for the two streams.

Table 8: Targeted Tuition Streams requirements

STREAM	MAXIMUM CLASS SIZE	TEACHER QUALIFICATION REQUIREMENTS	CURRICULUM REQUIREMENTS
Social English	25	<ul style="list-style-type: none">Undergraduate degreeCurrent enrolment in a postgraduate TESOL¹⁹ qualification	Non-accredited curricula can be used
Pre-Employment English	20	<ul style="list-style-type: none">Undergraduate degreePostgraduate TESOL qualification (completed)	Accredited curricula/ training packages must be used

¹⁹ Teaching English to Speakers of Other Languages

5.3.2 The introduction of Targeted Tuition Streams has not resulted in differentiation of service delivery

Some community organisations, government stakeholders, and service providers welcomed the fact that the targeted streaming acknowledges the different backgrounds and goals of migrants. However, those with direct experience of the streaming mostly considered it to be ineffective.

Program data shows that more than 86 per cent of AMEP students are enrolled in the Pre-Employment stream. Of the small minority taking Social English, a greater proportion are female. The average hours attended by the Social English participants is slightly lower than their Pre-Employment counterparts.

Figure 20 shows that family visa holders over 55 years of age are the only cohort with significant Social English enrolments. This group is relatively evenly split between Pre-Employment and Social English.

Several factors potentially contribute to the lower Social English enrolment rates. Firstly, some AMEP students receive income support payments from Centrelink and are subject to 'mutual obligation requirements' which require them to enrol in Pre-Employment English regardless of their English proficiency. As only five per cent of AMEP students are in this position,²⁰ mutual obligation requirements are not a major factor contributing to overall enrolments.

Four service providers nevertheless reported that mutual obligations with Centrelink account for high enrolments in Pre-Employment English.

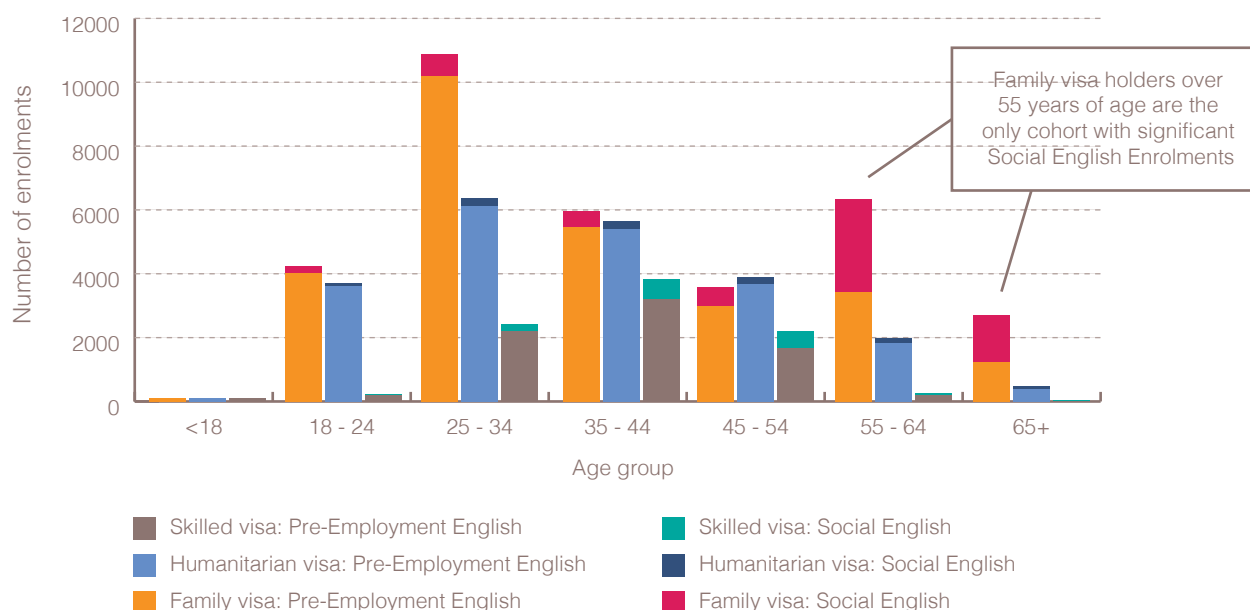
Most of our students get Centrelink – so it's very hard to make a social stream because we never have enough clients.

—AMEP service provider

Secondly, service providers can charge the government a higher fee for delivering Pre-Employment English. Although some providers charge the same price for Pre-Employment and Social English, the price difference can be as large as \$7.80 per student per hour. This raises the possibility that providers may be deliberately enrolling clients in this stream to receive a higher tuition fee. However, analysis of the statistical relationship between the proportion of Pre-Employment enrolments and the price differential by contract region reveals that there is no significant correlation between the variation in tuition fees charged and enrolment proportions in the two streams. That is, the providers that charge a higher rate for Pre-Employment English do not appear to consistently prefer to enrol students in this stream rather than Social English.

A third factor that possibly contributes to the high proportion of Pre-Employment enrolments across the

Figure 20: Targeted Tuition Stream enrolments by age and visa stream



²⁰ Data provided by the department.

AMEP is student perception. Students may perceive Social English as an inferior option to Pre-Employment English. One service provider and one community organisation reported this perception.

There was a very low uptake [for Social English]. It seems students view it as an inferior option. Many students still need an element of writing in everyday life and/or may wish to continue to study options in the future. Social English prohibits them from this.

—AMEP service provider

On the other hand, student focus group surveys revealed that 194 out of 350 students (55 per cent) did not know which tuition stream they were enrolled in. This suggests that they were either not given the choice, or did not understand the choice they were offered, when enrolling. Students' lack of awareness might also indicate that service providers see little value in explaining and emphasising the difference between the streams. Both circumstances—lack of choice between streams or perception of Social English as inferior—could explain lower enrolment in Social English across the AMEP.

Eight of 15 service providers and subcontractors reported that the outcome of this uneven enrolment is that running separate classes for the two targeted streams is financially unviable. Service providers can choose to run 'blended' classes consisting of students from both streams but, according to the current Service Provider Instructions (SPIs), must receive approval from the department to do so. Approved blended classes are paid at the Pre-Employment English rate for all participants and classes must adhere to the Pre-Employment English standards of a maximum class size of 20 students, higher teacher qualifications and accredited training delivery. However, given that all service providers to date have been using accredited curricula in both Pre-Employment and Social English, and that a grace period regarding the teacher qualification requirements is in effect until 30 June 2020, the only difference between the two streams is tuition fee and class size.

Departmental data shows that, from July 2017 to the present, 18 per cent of AMEP classes have been blended. This figure includes approved and non-approved blended classes. Only five per cent of classes across the AMEP are solely Social English enrolments.

Table 9: Proportion of Pre-Employment, Social and blended classes

Pre-Employment English classes	77%
Social English classes	5%
Blended classes (including approved and non-approved blended classes)	18%

The Australian Council of TESOL Associations (ACTA) argues that targeted tuition cannot be achieved using a blended class model. A service provider supported this view, advising that blended classes are problematic because the teacher is required to teach reading and writing to one part of the class but not the other.

Only 28 per cent of blended classes across the AMEP have been approved by the department. Service providers who have not sought approval for a blended class will not receive the higher fee for the Social English students enrolled in the class. The department reported that it does not refuse to approve applications for blended classes, therefore the high proportion of unapproved blended classes indicates that service providers often simply do not apply for approval.

Three service provider submissions claimed that the blended class approval process created an administrative burden. The department has acknowledged these concerns and is in the process of phasing out the approval requirement.

Five service providers indicated that the separation between Pre-Employment English and the Social English is pedagogically inappropriate in English as an Additional Language (EAL) teaching, particularly for low-level students. They reported that all beginner language learners, irrespective of stream, cover similar topics with a focus on settlement, and that employment-specific modules are introduced at a later stage. They also reported that an employment focus was not suitable for many of their students, who had not yet reached a level of English proficiency to cope with this material. These providers explained that, at lower levels, there is little differentiation between the content delivered in the two streams. The following teacher survey response summarises this view.

Targeting tuition streams are not helpful at all to adult English learning because students need to learn all skills to function in Australia. Tuition streams are an artificial construct which gives no added benefit to students and adds layers of admin to our delivery.

—Teacher survey respondent

Analysis of the teacher survey shows that only one third of surveyed teachers felt that targeted tuition streams have had a positive impact. More than half of the teachers surveyed felt that the streaming has had a negative or no impact on increasing student participation, wellbeing and effectiveness of learning outcomes.

Key finding:

The introduction of Targeted Tuition Streams has not been effective in differentiating service provision to students according to their needs and motivations for learning English.

5.3.3 Stakeholders consider the Targeted Tuition Streams to be inappropriate to the settlement aims of the AMEP

Stakeholders across the sector are concerned that the tuition streams are not appropriately aligned with the AMEP's objectives. Five service providers, three community organisations and one government agency expressed concern that the introduction of the Targeted Tuition Streams and the emphasis on employment outcomes for the majority of students reflected a shift in focus away from settlement goals in the AMEP.

It can be argued that the AMEP is fundamentally a settlement skills program. Participants in the AMEP have different reasons for engaging in the AMEP, but core objectives would be to prepare and develop skills to aid successful settlement. Categorising the AMEP into two distinct streams would not appear to recognise this fundamental nature of the AMEP.

—AMEP service provider

Two service providers have endeavoured to retain the settlement component of AMEP within their delivery of the curriculum. While they reported that there was some leeway to do so, they stated that the heavy focus on employment detracted from meeting the settlement needs of students.

Key finding:

The introduction of Targeted Tuition Streams has contributed to a shift away from the settlement focus of the AMEP towards employment-focused outcomes.

5.3.4 The introduction of Targeted Tuition Streams has not resulted in tailored service delivery for cohorts with specific needs

While the primary purpose of the Targeted Tuition Streams is to cater for the specific needs of AMEP students, it is not clear that they are effectively aligned with the actual needs of many AMEP students. As discussed in section 3.3, AMEP students face a variety of obstacles, and different student cohorts face specific challenges. Some of these cohorts were identified by stakeholders and service providers. They include:

- students with low literacy
- students who have experienced trauma
- female students on either humanitarian or spouse visas
- students aged approximately 55 years and over
- students aged 18-24 years
- students seeking employment.

ACTA noted that the learning needs and motivations of adolescents and young adults are different to those of older adults, and it is inappropriate to enrol members of this cohort in regular adult AMEP classes. Settlement Services International and the Centre for Multicultural Youth agreed with ACTA's concern. They emphasised the need for specific classes tailored to younger migrants. A government stakeholder and ACTA also indicated that effective youth programs were lost when some previous service providers did not retain their AMEP contracts. They made specific mention of the youth programs run by AMES Australia in Victoria for newly arrived refugees and migrants (see AMES 2014).

In all seven case studies, stakeholders reported that the motivation for AMEP students to find employment is one of the principal reasons they do not complete the full 510 hours of their AMEP allocation. Students in

focus groups mentioned many reasons for needing to find work, including:

- the desire to be independent of Centrelink
- the need to provide for their family
- the pressure or aspiration to send money overseas to relatives who are struggling financially
- the need to reimburse their visa application sponsor.

Stakeholders often commented that because of these pressures, there is a tendency among students to take low-skilled jobs with low English requirements. However, such work does not improve their prospects of career progression or finding better-paid work. These same stakeholders identified the importance of flexible strategies to maximise these students' access to the AMEP, such as provision of evening and weekend classes. One member of the evaluation Advisory Committee suggested that the government should collaborate with migrant workplaces or employment organisations in order to better coordinate the conflicting priorities of employment and English learning. Options for improvement might include workplace English tuition, or flexible work scheduling conducive to attending class. Targeted, place-based strategies, supported by specific programs such as SLPET, are important in addressing the employment and language learning needs of migrants.

Five community organisations, two government agencies and four service providers reported conflict for students between attending AMEP and meeting their Centrelink mutual obligation requirements. Students in five focus groups across three case studies also described the ways in which pressure from jobactive²¹ providers to seek employment and attend appointments had impacted their English learning.

Also for my husband, if he is getting an English class – the work place [jobactive] says come and talk, and they don't realise he's learning. ... For my husband it is very stressful. Before he came here, but now he stopped and is getting another course.

—AMEP student

²¹ 'jobactive' is a service for job seekers funded by the Australian Government. Centrelink refers job seekers with mutual obligation requirements to jobactive providers. These providers support job seekers to look for work or to access training.

Female AMEP students can face multiple challenges such as taking care of their families, fulfilling cultural expectations, having low or no literacy and suffering from trauma. Some female students on partner visas experience social isolation, dependence on their partners, and family violence. *The National Plan to Reduce Violence against Women and their Children* (DSS 2016) states that women from culturally and linguistically diverse communities are particularly vulnerable to family violence. While students themselves did not openly talk in focus groups about family violence, service providers and other stakeholders told Social Compass that this was an issue many female migrants faced. Female students did, however, report feeling socially isolated, and dependent on their partners.

Stakeholders also reported that teaching is less effective when classes consist of students with differing levels of English proficiency. Students in eight focus groups in five different case study locations described the distress of lower-level students who fall behind, or the boredom and frustration of higher-level students for whom the pace is too slow. Eight teachers provided comments in the survey about the problems of having multiple levels of students in one class.

We have large classes, with mixed ability and it doesn't benefit the learners with low literacy in their own language. They need to be in specialised classes but no funding is available.

—AMEP teacher

Sixty-eight per cent of respondents to the teacher survey felt that having students of different literacy levels in the same class was inappropriate.

Stakeholders and students emphasised the usefulness of bicultural assistants in AMEP classes. Several of these stakeholders suggested that the use of bicultural/bilingual workers could be increased to enhance outcomes for low English proficiency/low literacy students.

Key finding:

Despite the positive intent of the Targeted Tuition Streams, AMEP students have a wide and varied range of learning needs that have not been met by the Targeted Tuition Streams.

Recommendation – Targeted Tuition Streams

The Targeted Tuition Streams should be discontinued. Future attempts to customise AMEP delivery should focus on the different learning needs of the diverse cohorts in the program and take into consideration factors such as age, level of education and literacy, and pre- and post-migration experiences.

5.4 Distance Learning

5.4.1 Introduction

Distance Learning (DL) provides students in the Adult Migrant Program (AMEP) with the choice of learning English outside of the classroom. All students are eligible for DL, even if they are attending classroom-based tuition. DL students have one-on-one classes with an AMEP teacher via Skype or telephone, and do self-paced study using online materials or books and CDs. DL also provides the option of participation in an online 'virtual' classroom.

DL was introduced to the AMEP in 1983. Between 2011 and 2014 DL was delivered by a consortium of providers. Under the NBM, it is delivered by a single, national provider, TAFE NSW.

AMEP students access DL for a variety of reasons. Some are located in regional or remote areas and are too far from a classroom-based service provider to attend classes. The majority of DL students are from metropolitan areas. They use DL for medical reasons, because they have carer responsibilities or because they have found employment and cannot commit to attending classes. Some students might want to access services during holiday periods, to use up remaining AMEP hours, or to complete a certificate.

Under the NBM, the numbers of students accessing AMEP tuition through DL has declined dramatically. This section explores possible reasons for this decline after describing changes to DL under the NBM.

5.4.2 Changes to Distance Learning under the new business model

In the previous contract, DL students completed one hour of one-on-one tuition (via phone or Skype) with an AMEP teacher, and four hours of independent study. In this delivery mode, students had five hours deducted from their entitlement each week.

Under the new contract, the allocation for teacher-assisted learning is 25 per cent of the learning package; the remaining 75 per cent is independent learning. The teacher-assisted learning includes one-on-one Skype sessions, participation in a virtual classroom with other students, and other teacher

support, such as provision of additional resources and email messaging. The DL provider provides three learning plans of six, 10 or 20 hours a week. The 25/75 model is demonstrated in Table 10.

Table 10: Delivery model for six-hour DL plan

DISTANCE LEARNING DELIVERY MODE	NUMBER OF HOURS	% OF LEARNING
One-on-one Skype session with teacher	1	25%
Other teacher assisted learning	0.5	
Independent learning	4.5	75%
Total	6	100%

The 10 and 20-hour plans offer an additional component: a virtual classroom called iSee. The 10-hour plan includes one hour of iSee per week and the 20-hour plan includes three hours of iSee, with an associated increase in independent learning as prescribed by the 25/75 model.

The virtual classroom allows DL students to interact with other AMEP students. The teacher designs a lesson around a topic for a group of students, who can participate in discussion, give presentations or pair off to participate in role plays. The virtual classroom works to address the problem of social isolation that many migrants experience, especially in regional areas.

To accommodate the low levels of digital literacy of some students, DL offers the option of using books and CDs in place of online learning. For beginner students, learning is solely paper based. As students make progress, those who were not initially comfortable using digital technology are encouraged to transition to online learning.

The DL service provider employs bilingual teachers who are matched with low-level students. A telephone interpreting service is also used. Students have access to Pathway Guidance Officers, as well as TAFE counsellors and a multicultural support officer. The digital support division at TAFE NSW is also available to DL students to assist with technological issues. Teachers can refer students to the digital support team and facilitate communication between the two.

5.4.3 The Distance Learning student cohort is predominantly female family visa holders

While there has been a significant decline in numbers of DL students under the NBM, the composition has remained very similar over the past five years. As shown in Figure 21, DL students are mostly female family visa holders. The next largest cohort is male family visa holders, followed by female skilled visa holders. The vast majority had 12 or more years of schooling prior to arrival in Australia.

5.4.4 Distance Learning is producing positive learning outcomes for students

As part of the DL case study, 39 students took part in an online survey.²² The survey data provides insights into why students chose DL. Consistent with the overall DL demographic, 32 of the respondents were female. Similar to other case studies, these students described a generally positive experience of the AMEP.

In responses to the open-ended question about reasons for choosing the DL option, flexibility was mentioned most frequently (13 individuals). Children and other family commitments was the next most

commonly cited reason (eight individuals—all women), followed by work commitments and living in a rural location (seven individuals each).

Four of the seven men mentioned work commitments.

For convenience and flexibility to combine study with my work.

—AMEP DL student

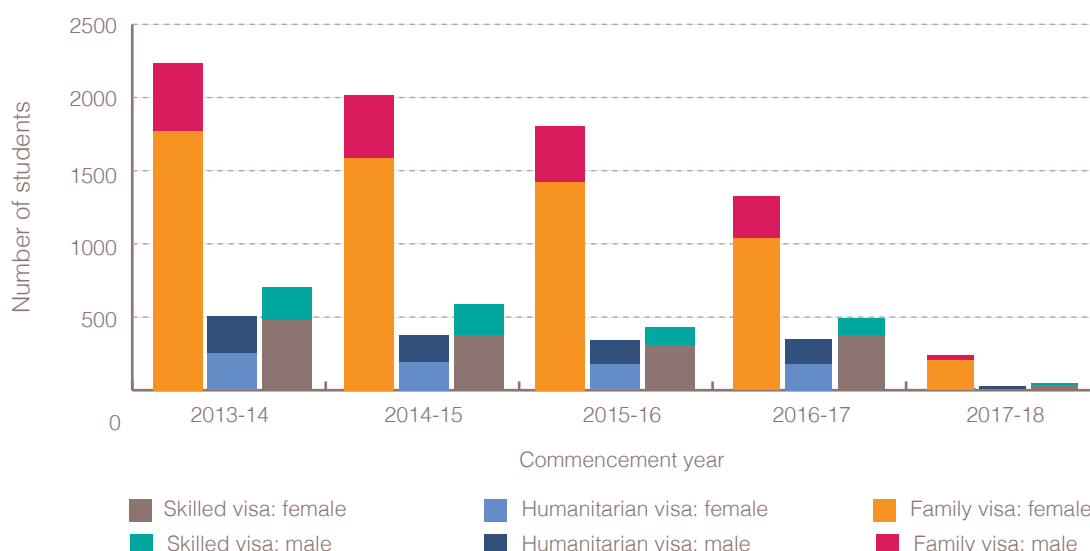
When asked to identify outcomes of their AMEP participation, student responses mirrored those of the other case study focus groups. These outcomes included:

- improved English: 'I can make longer and more complex sentences'. 'I understand different tenses in English better'.
- improved confidence: 'My listening is better and I feel more confident when I talk to customers'.

Students identified different contexts in which they are applying their learning, including communication with their children's schools, report writing at work, understanding Australian slang, and participating in their community.

The survey also demonstrated self-reported

Figure 21: DL students by visa stream and gender



²² Social Compass asked the DL provider to identify students across a range of levels to participate in the survey. Not all DL students were asked to participate.

Figure 22: DL student survey: self-assessment of confidence levels before AMEP and now

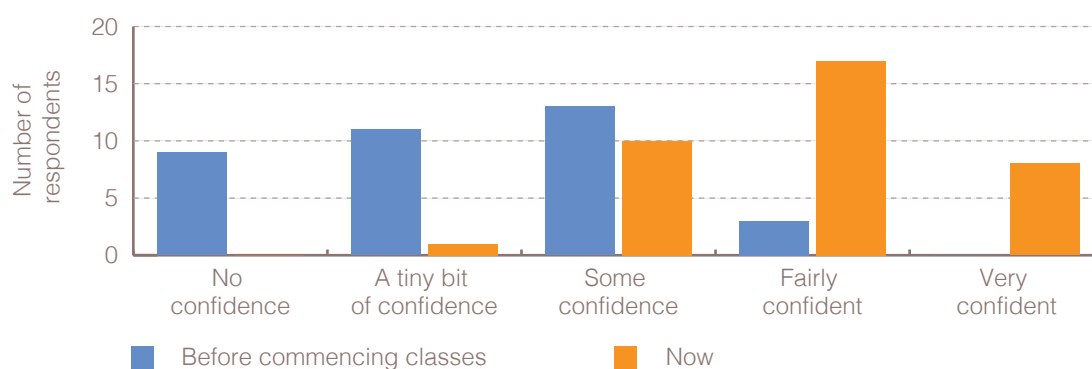
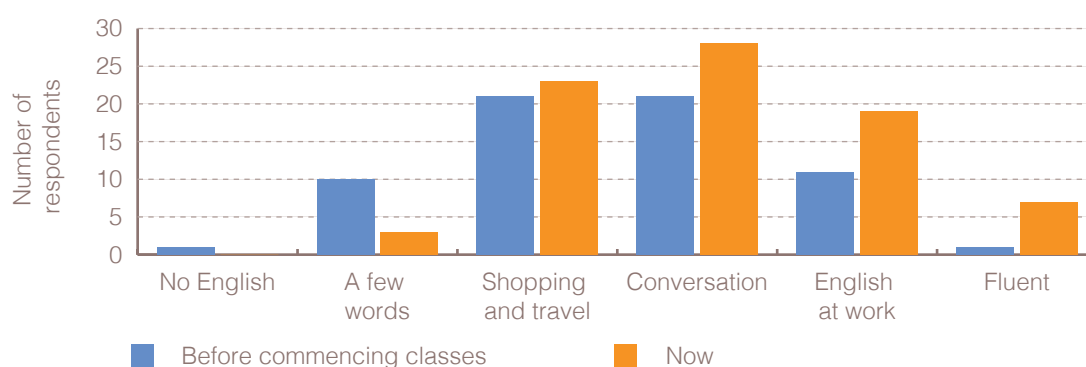


Figure 23: DL student survey: self-assessment of English proficiency before AMEP and now



increases in confidence and improvements in English proficiency as shown in Figure 22 and Figure 23.

Staff and teachers at TAFE NSW agreed that the principal strength of the DL program was the positive relationships built by one-on-one teaching.

It's a very student-centred program that we offer. So students or clients have a prime teacher and that teacher is the person who provides a one-on-one Skype meeting with them every week for one hour. So you can imagine, having a lesson every week with that person for an hour, relationships do get built up.

—AMEP DL service provider

Eleven DL students specifically mentioned their teachers and/or the Skype teaching format in response to an open-ended question about enabling factors.

I feel more connected since the teacher is someone I trust and can ask different questions which I wouldn't just ask anybody.

—AMEP DL student

5.4.5 Distance Learning service provider perspectives

Service provider perspectives accorded well with those of the surveyed students. TAFE NSW staff and teachers also felt that the principal strength of the DL program was the strong relationships that develop between students.

We have found that relationships [between iSee students] have been built up so that they've been taken out of the classroom into the private sphere, and they're phoning and talking to each other socially.

—AMEP DL service provider

DL service provider staff were enthusiastic about the benefits for students of the virtual classroom, and see this as a positive aspect of the current contract. However, they also indicated that students who transitioned from DL under the previous contract were disappointed that under the new system six hours were deducted per Skype session. Previously, only

five hours were deducted from their entitlement for each hour of teacher-assisted learning they attended. Some were also hesitant to participate in the iSee classes due to additional hours being deducted for independent learning.

You can see why some students, even though they see why the iSee class is good for them, they are reluctant to go to the iSee class because the self-paced hours claimed on their entitlement jumps from 4.5 to 7.5 [hours].

—AMEP DL service provider

It takes away the flexibility, the actual self-paced component of the whole concept.

—AMEP DL service provider

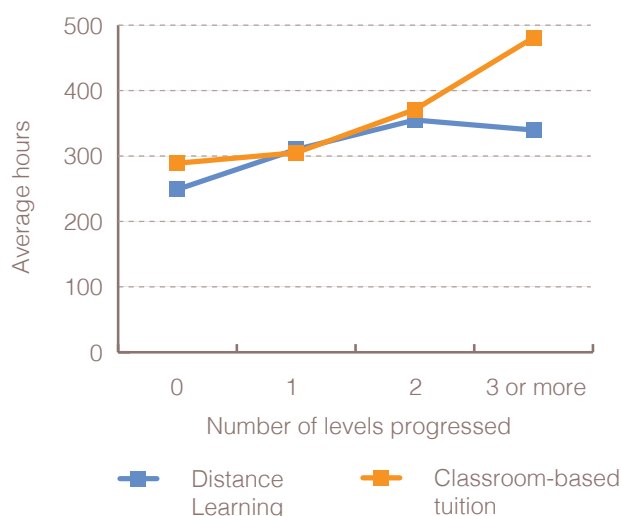
Staff from another service provider also reported that some of their students were disappointed that they had to sign up for a minimum of six hours per week if they wanted to do DL.

The flexibility being offered was limited. We had expected that clients would be able to sign up for a minimum number of hours.

—AMEP teacher

Concerns regarding hours deducted in DL were identified by teachers. Students were not explicitly asked about this issue. To assess whether or not self-paced study was less effective to support student progress, program data was analysed to compare the progress of DL-only students with those only receiving classroom-based tuition.²³ Figure 24 shows that DL students progress at a similar rate to their non-DL counterparts.²⁴

Figure 24: Number of ACSF levels progressed by hours comparing DL and classroom-based tuition



5.4.6 Distance Learning and AMEP subprograms, client support and relevant NBM changes

Special Preparatory Program in Distance Learning

The AMEP Service Provider Instructions (SPIs) for the current contract state that the Special Preparatory Program (SPP) must be made available to eligible DL students. The removal of the funding cap for this subprogram has been welcomed by the DL provider. However, SPP clients who live within 50 km of an AMEP delivery site may only use half of their allocated SPP hours in DL. The DL service provider argues that this condition limits the benefit of the program.

²³ Under the NBM, student initial and progress assessments are reported using the ACSF. Student progress in the AMEP is described using eight indicators: two each for the skills of reading, writing, learning and oral communication. For each indicator, a student can progress zero to five levels: from Pre Level 1 A and B through Levels 1 to 3. For the purposes of this evaluation, student progress is calculated by adding the number of levels a student has advanced across all indicators on which they have been assessed during their time in the AMEP. A student who has progressed by two levels may have advanced by one level in two indicators, or they may have advanced by two levels on one indicator.

²⁴ This finding needs to be treated with caution given the potential anomalies identified with the way the ACSF has been implemented to measure student progress (see sections 6.3 and 7.1). It is recommended that these analyses be repeated once the department has collected curriculum outcomes as this is likely to be a better representation of actual student progress.

For Distance Learning, we can only access 50% of those additional hours.[...] Which is very unfair, because they're obviously doing DL for a reason. We're really disadvantaging these students.

—AMEP DL service provider staff

Despite these concerns, program data shows that the average SPP hours used by DL students has increased under the new contract in both metropolitan and regional areas although overall usage is low.

Curriculum choice in Distance Learning

The introduction of curriculum choice under the NBM has caused some problems for DL. AMEP students can choose to supplement their classroom-based learning with DL. These students are referred to as 'co-enrolled'. The curriculum that TAFE NSW uses for DL is the Certificates in Spoken and Written English (CSWE), but a co-enrolled student might be learning a different curriculum with their local provider. The DL service provider explained that a co-enrolled student who is studying two different curricula is less likely to complete a certificate in either curriculum within their 510 hours. In this situation a student might have made good progress in English but does not have any certification to show for it.

We have students in Melbourne who are doing EAL,²⁵ we're doing CSWE, so we're not teaching in the same curriculum. But it's still English, and it's still English for settlement purposes.

It's not bad for us, the provider, but it's negative for the students because they are enrolled in two different courses where they won't achieve a certificate here or there in their 510 hours.

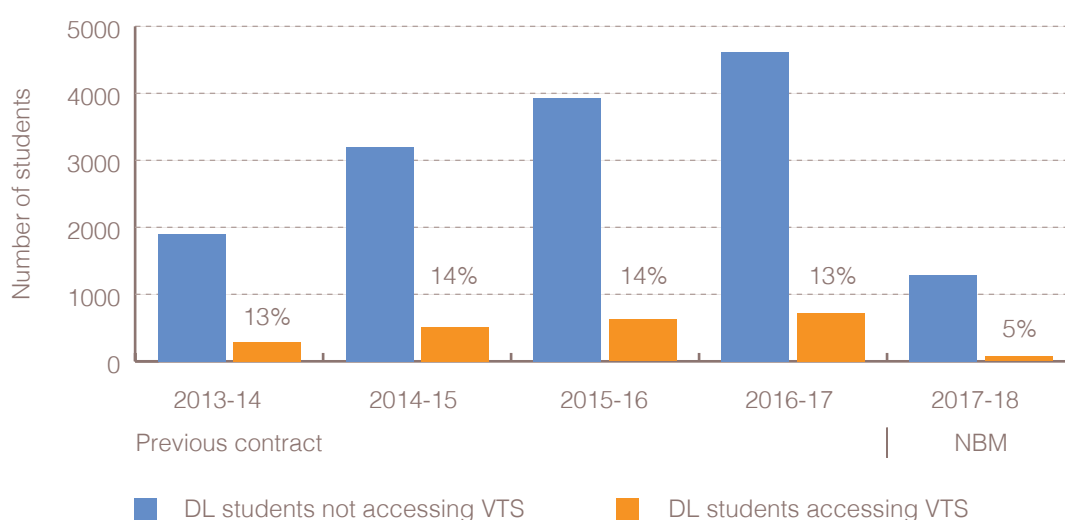
—AMEP DL service provider staff

As noted in Section 6.1, program data shows that of the 402 students who participated in both DL and classroom-based learning, 185 (46 per cent) accessed both learning modes through the one service provider (TAFE NSW) and therefore used the same curriculum (CSWE). It is likely that the number of co-enrolled students studying two curricula is currently quite low. Nevertheless, given that the objective of DL is to provide flexible learning options, it should ideally offer the opportunity for students to study their chosen curriculum.

Volunteer Tutor Scheme (VTS)

Service provider staff report that DL students, particularly those living in regional areas, benefit from having a volunteer tutor. Figure 25 shows the numbers of active DL students each year in the previous contract and the number and proportion accessing a volunteer

Figure 25: Active DL students with access to a volunteer tutor



²⁵ English as an Additional Language Framework

tutor. While the proportion is consistent over the years of the previous contract, the first year of the NBM (2017-18) saw the proportion of active DL students with a volunteer tutor drop from 13 to five per cent.²⁶

This decrease could be partly explained by the transition to the new contract during which outgoing service providers did not hand over details of their volunteer tutor pool to the incoming provider. This loss of volunteer tutor networks occurred in several regions where service providers changed.

The responsibility for matching DL students with a volunteer depends on whether the student is enrolled in DL only, or is co-enrolled in DL and classroom-based tuition. For students who are co-enrolled, it is the responsibility of the classroom-based provider to organise a volunteer tutor if the student requests one. For students who are enrolled in DL only, it is the responsibility of the DL service provider, regardless of where the student is located (DET 2018b, p. 50).

The DL provider has advised that finding tutors for DL-only students living outside of its contract region became 'extremely time consuming' because it does not have the tutor contact details for other contract regions. Students located outside of the TAFE NSW contract region who request a volunteer tutor are currently instructed by the DL provider to ask their local AMEP provider to organise this. In some cases a volunteer tutor is provided via Skype.

Key finding:

Distance Learning in the AMEP faces several challenges:

- *Some humanitarian DL students may be disadvantaged by the rule that if they live within 50 km of an AMEP delivery site they may only use half of their allocated SPP hours in DL.*
 - *Some co-enrolled students are studying two separate curricula and are therefore less likely to complete a certificate.*
 - *DL student access to volunteer tutors has decreased.*
-

5.4.7 Enrolments in Distance Learning have dropped dramatically under the NBM for a range of structural reasons

There are a range of structural reasons that can prevent students from accessing DL.

Student capacity and preference

Students' circumstances can prevent them from accessing DL services. Stakeholders noted that students with low literacy and/or disadvantaged backgrounds might not have the skills required to use the DL technology.

In relation to the online learning program, respondents noted that the online course is not tailored to the different tuition needs of participants. Specifically, the online course assumed a level of familiarity with English and is not suited to beginners with limited or no English language proficiency.

—Community organisation

In their report on information and communications technology and employability for migrants in Europe, Reichel et al. (2015, p.5) found that, 'age, education, employment status, and types of occupation were clear sources of digital inequalities' within the migrant cohort. Alam and Imran (2015, p.358) note a similar 'digital divide' among Australian humanitarian migrants based on focus groups in Toowoomba, most apparent 'in terms of affordability and age'. In its 2018 evaluation of DL in the AMEP, Proper Business found that the low level of English and computer literacy skills of some students meant that DL was not an appropriate option. The evaluation noted that while hardcopy learning resources are available to students, this was not the DL provider's preferred mode of delivery and awareness of this option was low (Proper Business 2018, p.11).

²⁶ The apparent increase in active DL students over the years of the previous contract reflects a limitation of the dataset used for analysis. Many active students in DL commenced in the AMEP in previous years. The dataset used for this analysis only includes students who commenced from 2013-14 onwards. Active DL students who commenced prior to this date are not captured in this data. The next section explores this data further and explains that DL enrolments were actually in decline under the previous contract.

Community organisations also reported that students preferred face-to-face interactions over online learning.

People are not so comfortable learning from a computer without a teacher in the room, and even just getting a space to learn in, a room, is hard. People are not using it. It is only an option for those who don't need learning support, and most do.

—Community organisation

Other barriers to participation in DL are similar to those faced by AMEP students more generally. A particular challenge is combining English learning with work.

Where we are, because it's a rural area, there are a lot of migrants who are eligible who aren't accessing it because they come on as skilled migrants and are doing the hard yards in jobs out west. Unfortunately many aren't taking it up – IT is difficult, they're exhausted after work – a whole bunch of factors in terms of take-up.

—Community organisation

In addition to these general reasons that would have been present in the previous contract, several structural factors have been identified that are likely to have contributed to decreased enrolments in DL under the NBM. These reasons include an existing decline, the move from a consortium to single provider, and change in incentives.

DL commencements had already been steadily declining

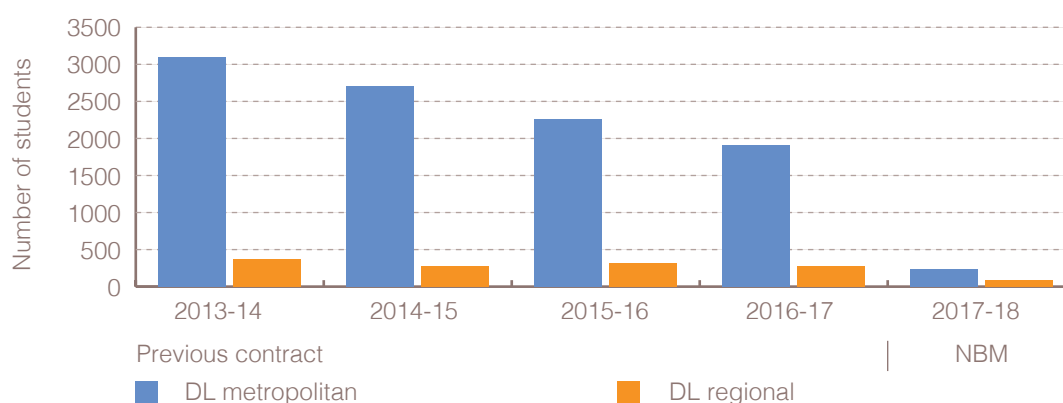
Figure 26 shows that there had been a steady annual decline in DL commencements under the previous contract. Between 2015-16 and 2016-17 there was a 16 per cent decrease in DL commencements, consistent with the preceding two years. The transition to the new contract, however, saw a dramatic 80 per cent decrease in DL commencements.

The switch from a consortium to a single provider

This 80 per cent decrease in DL activity is disproportionate to the 29 per cent overall decline in commencements across the AMEP in the transition to the NBM.²⁷ As shown in Figure 26, the decline in DL commencements was more marked in metropolitan areas than in regional areas.²⁸

Only 35 per cent of DL clients who commenced in 2016-17 continued to be active in DL in 2017-18, compared to an average of 60-70 per cent retention rate for the second year under the previous contract.

Figure 26: DL commencements in metropolitan and regional areas: previous and current contracts



²⁷ This decline was in part a natural correction as the large cohort of Iraqi and Syrian humanitarian entrants passed out of the program. When compared to the previous year, 2015-16, the decline in commencements across the AMEP was 7 per cent.

²⁸ AMEP contract regions are designated as metropolitan, regional or remote. For the purposes of this report, the term 'regional' refers to areas that are not metropolitan.

Figure 27 shows that the bulk of the DL enrolment reduction that occurred in the contract transition is the result of significantly lower referrals from Victoria and NSW. The NSW and Victorian DL providers under the previous contract provided 76 per cent of all DL enrolments. With no DL provider in Victoria, the proportion of students from Victoria is almost half that of those in NSW under the NBM. The majority of students from both the former NSW and Victorian providers failed to transition to the new DL provider after the introduction of the NBM.

Departmental data shows that the two main partners in the previous consortium, one from NSW and the other from Victoria, were responsible for referring 76 per cent of DL clients in 2015-16. Both these providers had large numbers of students in classroom-based tuition. In 2017-18, the current provider, located in NSW, accounted for 40 per cent of the referrals, a similar proportion to each of the main providers within the previous contract. Given that the majority of DL students in the previous business model were referred by service providers who were also the DL provider, the loss of a DL provider in Victoria is a major reason for the significant drop off in DL numbers under the NBM. It is probable that provider self-interest motivates referrals. Proper Business, in their 2018 review of DL, noted that for providers other than TAFE NSW, referral of students to DL amounts to 'a financial reduction for the service provider, particularly if the student chooses to reduce face-to-face classes in favour of distance learning' (p.13).

Differing incentives

The previous contract featured two other key structural differences. Firstly, there was a performance indicator requiring service providers to refer five per cent of students to DL, which may have increased DL enrolments. The Proper Business evaluation suggested that 'the department may

also want to consider re-establishing a contractual requirement for encouraging a certain level of referrals to distance learning' (2018, p.6).

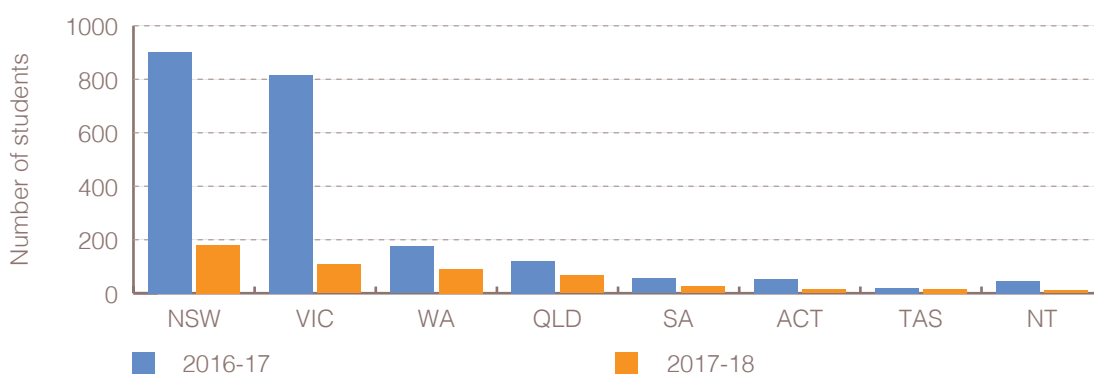
Secondly, under the previous contract, the AMEP delivered a settlement course that students could choose to access either through their classroom-based provider or as an online course through the DL provider. This course was discontinued in the NBM. Departmental data shows that 2344 students took this course in 2016-17 using the online option. Of these students, 233 (10 per cent) participated in DL solely to complete the settlement course. The remaining 2111 participated in other DL tuition. It is not clear from the data what proportion of the 90 per cent that did additional DL were introduced to DL through the settlement course. For those who were introduced to DL this way, it is likely that the settlement course acted as an effective demonstration of the benefits of DL. This course would have familiarised students and service provider staff with DL as well as directly boosting DL enrolments under the previous contract. It is possible that the discontinuation of the course has contributed to the decline in commencements under the NBM.

Key finding:

Several structural differences between the NBM and the previous contract are major contributors to the decline in DL enrolments, namely:

- *the department's decision to move from a consortium to a single provider*
- *a continuing underlying trend of declining enrolments*
- *different incentives for service providers under the NBM compared to the previous contract*
- *transition difficulties.*

Figure 27: Number of DL student commencements in each state/territory by previous and current contracts



5.4.8 Enrolments may be lower due to poor relationships and promotion

Evidence from both this evaluation and the 2018 Proper Business evaluation (pp.12-13) suggests that lack of communication between the current DL provider and other providers has contributed to a reduction in DL referrals. Staff from both the DL provider and other service providers expressed frustration with the referral process. Some providers reported that the process was slow, and that administrative issues impeded student enrolment into DL.

I'll give that a thumbs down. Initially we found it very difficult to get the referrals to Distance Learning happening.

—AMEP teacher

Other providers reported that they were not familiar enough with the program to promote it to their students, and that the DL provider had not provided enough information about or promotion of the service.

I think Distance Learning is a great option too but I don't think in this current contract it seems to be as well taken-up or accessed as it used to be. I know it's managed in one particular state – and I may just have a Victorian perspective – but previously there were more times when distance learning staff actually visited sites in the flesh and promoted it to teaching staff as well as to students.

—AMEP service provider

Seven service providers mentioned that they were isolated from the activities of the DL program and are unable to track the students they refer or understand how they benefit from the DL program.

We refer students to distance learning when it's requested, but we don't have the knowledge of how effective it is so can't really say if it's effective or not. We're able to put students into face-to-face in most instances. All students have the option. Can't say how effective it is because we don't have contact with it.

—AMEP service provider

The primary contact for AMEP students is their teachers. If the teachers are not informed about DL it is likely that students will not be encouraged to take up this option. This is cause for concern. In one focus group, a student expressed frustration that after completing a level she then had to repeat the same curriculum with lower level students. She was undertaking AMEP at a centre that did not have sufficient students to offer a higher-level class. Students in such situations would likely benefit from an accessible DL option, but awareness of these options needs to be improved.

5.4.9 Summary and recommendation

Students and key stakeholders in the DL case study identified positive outcomes from the DL mode of AMEP. The progress data indicates that DL students are doing at least as well as their classroom-based counterparts. Key issues that warrant further investigation include:

- the decline in use of volunteer tutors
- the change in the ratio of teacher assisted hours to independent learning
- a minority of DL students that are required to work across two curricula.

A more serious concern is the decline in students enrolling in the DL mode. The evaluation has identified multiple structural factors contributing to this decline. It has also identified communication problems between the general service providers and the DL provider. These findings call into question the effectiveness of a single provider model for a country the size of Australia.

Evidence indicates that large numbers of students enrol in DL if there is a financial incentive for their local service provider to refer them (i.e. they are also a DL provider). There is no evidence to suggest that this disadvantages students or that they are unwilling referred to DL. Conversely, several stakeholders identified the financial disincentive for non-DL service providers to refer students to the DL provider. While this financial disincentive would also have existed in the previous contract, a key performance indicator (KPI) measuring referrals would have helped mitigate this disincentive.

These findings suggest there is probably significant unmet demand for DL among AMEP students. The department could consider incentivising greater DL engagement by reintroducing a referral KPI, by introducing DL-specific courses or through increasing the number of general service providers who are also DL providers. The latter would incentivise an increase in the number of self-referrals and could be achieved under a consortium model (as in the previous contract) or through multiple DL contracts.

Recommendation – Distance Learning

The department should consider introducing multiple Distance Learning (DL) providers to the AMEP. A wider range of choice would:

- *encourage DL providers to promote their service offering to local providers*
 - *allow local providers and teachers to refer students to a DL provider that best complements their classroom-based tuition*
 - *facilitate service provision across multiple Australian time zones.*
-

TEACHING THE ADULT MIGRANT ENGLISH PROGRAM

6.1 Curriculum choice

6.1.1 Introduction

This section discusses the major change to curriculum in the Adult Migrant English Program (AMEP) under the new business model (NBM): the shift from a mandated single national curriculum for all providers to a choice of curriculum options. It explores the consequences of this change and suggests processes to ensure continued quality of AMEP provision.

Under the previous contract, all service providers across the AMEP taught the Certificates in Spoken and Written English (CSWE). The 2015 ACIL Allen evaluation found that the majority of service providers considered CSWE to be appropriate for use in the AMEP, but that some were not entirely satisfied with its capacity to fulfil the needs of all their students. In light of these findings, ACIL Allen (2015a, pp.90-93) recommended that further research should take place to determine the appropriateness of alternative, nationally accredited courses.

Under the NBM, AMEP service providers can select a curriculum that best meets the needs of their students. Providers must use a nationally accredited curriculum for Pre-Employment English, however they have the option of using non-accredited curriculum material in Social English.

Table 11: Curriculum requirements of each tuition stream

STREAM	CURRICULUM REQUIREMENTS
Pre-Employment English	Units of competency or modules from approved Vocational Education and Training (VET) courses or any Australian English language curriculum that is made up of certificates from VET courses, including CSWE, may be used.
Social English	In addition to the courses described for the Pre-Employment English stream, any equivalent English language tuition may be used, which includes unaccredited material or resources appropriate for teaching clients Social English.

To use a curriculum other than CSWE, service providers must seek approval from the department (DET 2018b, p.27). At the beginning of the new contract, the department did not have a list of curricula approved for teaching in the AMEP. It later commissioned a review of curricula being used by service providers as well as potential curricula. The review found that the following four main curricula in use were suitable:

- CSWE
- English as an Additional Language (EAL) Framework
- Core Skills for Learning (CSL)
- Certificate in English Proficiency (CEP)

The following table shows the number of principal service providers currently using each of the curricula.

Table 12: Curricula used by AMEP service providers

CURRICULA USED	NUMBER OF PROVIDERS
CSWE only	6
CSWE + Foundation Skills Training Package	1
CSWE + EAL Framework	2
EAL Framework only	2
CSL	1
Certificate in General Education for Adults	1

No provider reported to Social Compass that they were using non-accredited curriculum materials in their Social English classes. The department advised, however, that one service provider is using a non-accredited curriculum for a small cohort of students for a ten-week period.

6.1.2 Reaction to the introduction of curriculum choice is mixed

Although many service providers have chosen to continue to use the CSWE curriculum in their AMEP classes, eight of the 15 providers and subcontractors who participated in the evaluation reported that they welcomed the flexibility to choose a curriculum that best serves their needs. Three of those providers who explicitly welcomed curriculum choice have chosen to retain CSWE, but acknowledged that the option to use other curricula will allow customised service delivery in the AMEP.

We do welcome the changes in flexible choices for training package and accredited courses for use in the AMEP rather than restricting delivery to only CSWE courses. Although currently, we choose to continue with delivery of the CSWE suite of courses for all students currently in AMEP

courses, the option of offering other choices allows implementation of bespoke courses for specific cohorts should the need arise.

—AMEP service provider

Another three providers told Social Compass that in their opinion CSWE was the most suitable curriculum for use in the AMEP. (Notably, the provider which owns the CSWE did not explicitly express this view.) The remaining four providers did not comment on curriculum choice.

The evaluation Advisory Committee and the submission from the Australian Council of TESOL²⁹ Associations (ACTA) noted that the CSWE licence was expensive to purchase and that this expense was a factor driving some providers to choose a different curriculum. Several members of the Advisory Committee were glad to see a move away from the requirement to use a privately owned curriculum, whereas ACTA's submission stated that CSWE was the most appropriate curriculum for the AMEP and that the NBM was inappropriately allowing cost to drive curriculum choice.

ACTA believes that if curriculum choice was cost-neutral, providers would mostly revert to the CSWE.

—ACTA submission

One provider mentioned that it was not possible to view the newest version of CSWE before purchase, making it a high-risk choice.

6.1.3 The introduction of curriculum choice has weakened the effectiveness of the Assessment Task Bank

The Assessment Task Bank (ATB) is an online repository of assessment tasks for AMEP teachers. The AMEP quality assurance (QA) provider manages the ATB, including sourcing, validating and publishing new tasks to the repository. The QA provider facilitates National Working Group workshops which validate assessment tasks before they are added to the ATB. The transition to the new QA provider and the addition of new curricula to the AMEP resulted in some delays to full implementation of the ATB.

29 Teaching English to Speakers of Other Languages

Four service providers reported that the introduction of curriculum choice has reduced the effectiveness of the ATB. They explained that under the previous contract the ATB was a valuable resource for all teachers because all the tasks were designed for the CSWE. With the introduction of new curricula, providers only contribute tasks for the curriculum that they deliver. This situation has spread the contributions more thinly across different curricula and resulted in fewer common assessments for teachers to access. Those service providers who are using new curricula found that the ATB contains limited tasks for non-CSWE curricula.

This weakening of the ATB is the result of the tight implementation timeframe of the NBM rather than an inherent problem of introducing multiple curricula. Evaluation Advisory Committee members advised that the number of resources in the ATB is now increasing. Some of these resources are generic assessment tasks that can be used across multiple curricula.

6.1.4 Curriculum choice could impede transition between providers for a small proportion of students

Two service providers argued that a single curriculum across Australia allowed for more consistency of delivery for students who move from one provider to another. Students can also choose to be 'co-enrolled' in classroom-based tuition and Distance Learning (DL). Students who are co-enrolled might be learning one curriculum for their classroom-based tuition and another for their DL tuition. Students who change curricula or who co-enrol would therefore be less likely to complete a certificate in their 510 hours. However data from the department shown in Table 13 indicates that the proportion of AMEP students who move between service providers is negligible.

Table 13: Proportion of students transitioning between service providers, 2018-19

STUDENT BEHAVIOUR 2018-19	PERCENTAGE
Students who moved between general service providers in the multi-provider region.	1.92%
Students who moved between general service providers in single-provider metropolitan regions.	0.34%
Students who moved between general service providers in regional contract regions.	0.27%

The proportion of students who are enrolled in both DL and classroom-based tuition is also low. There were 402 co-enrolled students in 2018-19, who account for 0.84 per cent of the total AMEP population, and 26.21 per cent of the DL enrolments.

Given the low percentage of students who transition between or engage with multiple providers, the introduction of multiple curricula does not disrupt the learning of a significant proportion of AMEP students.

6.1.5 Numeracy in the AMEP

In the AMEP, four of the five Australian Core Skills Framework (ACSF) core skills are reported against. The four skills that are assessed for reporting purposes are learning, reading, writing and oral communication. There is no requirement to report on the fifth core skill of numeracy. The exclusion of the numeracy assessment from the AMEP accords with the new legislative instrument from 2017 that states a person is deemed to have functional English if they have achieved level 3 proficiency under the ACSF for each of the four core skills of learning, reading, writing and oral communication (*Immigration (Education) (Functional English) Specification 2017*).

Two service provider submissions to the evaluation, and two teacher survey respondents implied that numeracy cannot be taught in the AMEP.

*Please bring back numeracy into the AMEP.
How can you teach settlement without numeracy?*

—Teacher survey respondent

While it is clear that students are not assessed in numeracy, the current AMEP contract and Service Provider Instructions (SPIs) do not state that service providers should exclude numeracy from their curricula. The current Request for Tender states that service providers should integrate settlement skills into course curricula. These settlement skills include topics such as life skills, managing money and banking, and public transport. All of these skills require basic proficiency in numeracy. Many students with some education from their country of origin will have an understanding of numeracy, but need to be taught how to express these concepts in English. The AMEP equips such a student with the language skills to read a bus timetable in English, or conduct a transaction at a supermarket.

However, students who received no or low levels of education in their home country do not necessarily have the basic numeracy skills to engage with some of these settlement topics. These students require extra assistance with numeracy in conjunction with English language skills. Two service providers, and members of the evaluation Advisory Committee reported that currently in the AMEP some students are not being provided with the basic numeracy skills that they require for settlement in Australia.

Lots of students don't know their multiplication and haven't done any schooling – they wouldn't have a clue how to calculate change. And there's no numeracy – we used to have numeracy.

—AMEP service provider

The perception held by some service providers that numeracy cannot be taught under the current contract is not borne out in the contract or the SPIs. While numeracy is not assessed in the AMEP for progression against the ACSF, there is nothing preventing service providers from teaching numeracy. As stated by service providers and teachers, basic numeracy is highly relevant to settlement in Australia.

Key finding:

There is a perception among some service providers and teachers that numeracy cannot be taught under the current contract. While it is clear that numeracy is not reported against the ACSF nothing prevents teachers from delivering numeracy-related material from an accredited, approved curriculum.

6.1.6 Newly introduced curricula should undergo further review to assess their appropriateness for use in the AMEP

It is not within the scope of this evaluation to assess the appropriateness of the different curricula used in the AMEP. The evaluation is tasked, however, with evaluating the decision to introduce curriculum choice. As discussed above, many service providers have welcomed the flexibility this offers. However, themes have emerged from the evaluation which suggest that further review of curricula should take place to ensure their appropriateness for use in the AMEP.

Social Compass has received conflicting feedback regarding the appropriateness of the CSL training package. Of the 400 respondents to the evaluation's teacher survey, only 22 were using the CSL. These teachers using CSL indicated that they were, on the whole, satisfied with the curriculum. Five of these teachers made positive comments about the CSL, explicitly stating that the benefit of CSL is its alignment to the ACSF. However, these 22 respondents represent only six per cent of all CSL teachers who were approached to complete the survey. This rate was much lower than the overall national response rate of 20 per cent.

Social Compass also gathered information from teachers using the CSL through two teacher interviews, and submissions from a representative of a state teachers' union, a subcontractor using the CSL, and ACTA. All of these sources argued that the CSL is not appropriate for EAL learners. The submission from the teachers' union representative included responses from a survey of 54 teachers. Ninety-six per cent of these teachers responded negatively to the question 'Do you think CSL is a suitable training package for our ESL (English as a Second Language)

students?’ Ten of these teachers reinforced this view by adding a comment explaining that the CSL was not designed for language acquisition. The interviews with two CSL teachers and submissions from ACTA and a subcontractor supported this view. The submissions suggested that the CSWE or the EAL Framework would better meet student needs.

The evaluation also received feedback on the CSWE and EAL Framework.³⁰ ACTA recognises both the CSWE and the EAL Framework as appropriate curricula for the AMEP. However, the following results comparing CSWE and EAL teacher assessments of their curricula show that EAL Framework teachers are generally less satisfied than those who are still teaching the CSWE. Teacher survey data shows that 39 per cent of EAL Framework teachers and 53 per cent of CSWE teachers feel that their curriculum had a somewhat or highly positive impact on effectiveness of teaching. For effectiveness of learning, 37 per cent of EAL Framework teachers and 40 per cent of CSWE teachers responded positively.³¹

Figure 28 shows that 52 per cent of EAL Framework teachers and 36 per cent of CSWE teachers feel that their curriculum has had a somewhat or highly negative impact on their own wellbeing. This higher rate of dissatisfaction among EAL Framework teachers could be partly explained by the added stresses involved in changing to a new curriculum.

Four respondents to the teacher survey remarked in the optional comments section that the CSWE was a more appropriate curriculum for AMEP students than the EAL Framework.

Key finding:

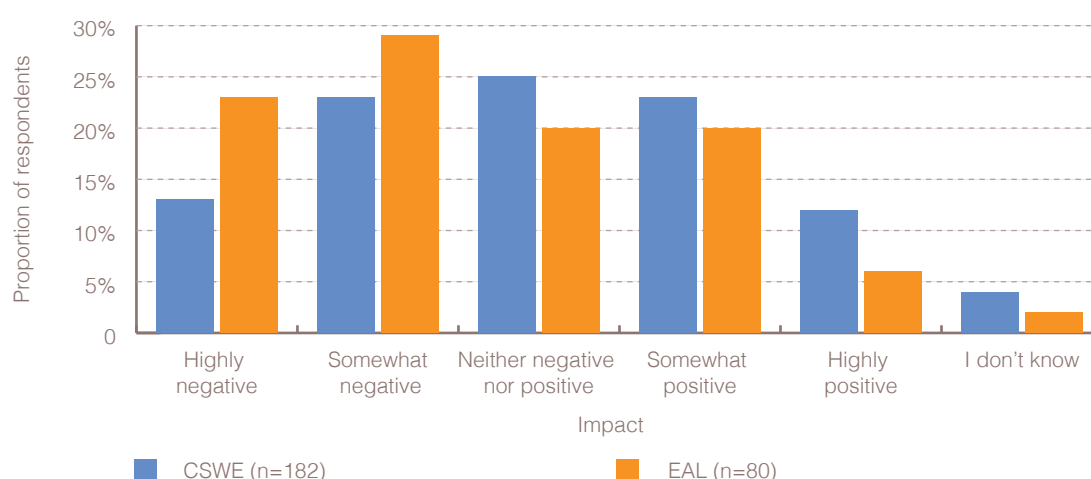
While curriculum choice has been broadly welcomed, current approval processes may not be sufficient to ensure that curricula are appropriate for EAL students.

Recommendation – Curriculum choice

Curriculum choice should be retained and curricula should remain subject to departmental approval. The approval process should include expert TESOL review to ensure that new curricula are appropriate for use in the AMEP.

The department should clearly communicate to service providers that they are permitted to teach numeracy as appropriate to the settlement needs of their students.

Figure 28: Teacher survey: impact of CSWE and EAL Framework curricula on teacher wellbeing



³⁰ The survey question did not distinguish between the old and new CSWE curricula. Given that some stakeholders expressed in interviews a level of dissatisfaction regarding the new CSWE, it is possible that negative attitudes to this curriculum could reflect dissatisfaction with this change.

³¹ Of the teachers using the CSWE, those who are employed by the service provider who owns the curriculum are somewhat more positive than those from other providers. Nevertheless, responses of teachers from other providers still tend towards the positive in their attitudes regarding CSWE.

6.2 Teacher qualifications

6.2.1 Introduction

Teachers with appropriate teaching qualifications are essential to the successful delivery of the Adult Migrant English Program (AMEP). Teacher qualifications for the delivery of accredited Vocational Education and Training (VET) courses are mandated by the curriculum or training package being delivered. Trainers and assessors must meet the standards specified in the *Standards for Registered Training Organisations (RTOs) 2015*.

The RTO and curriculum teacher qualification requirements are audited by:

- the Victorian Registration and Qualifications Authority in Victoria (VRQA)
- the Training Accreditation Council in Western Australia (TAC WA)
- the Australian Skills Quality Authority (ASQA) in all other states and territories.

Under the previous contract, which only delivered the accredited Certificates in Spoken and Written English (CSWE) curriculum, teacher qualifications were not specified in the contract. Instead they were mandated through the curriculum.

Teacher qualifications for CSWE (2013)

- A recognised bachelor degree—a formal qualification awarded by an Australian university or tertiary institution, or its onshore or overseas equivalent, that is at least three years full-time in length or its part-time equivalent; and a recognised postgraduate TESOL (Teaching English to Speakers of Other Languages) qualification resulting from a course of study in which course content of no less than 100 contact hours (or a distance learning equivalent) covers the grammar of the English language, learning and TESOL methodology and includes a practicum.

or

- A Bachelor of Education with a TESOL major or equivalent that includes a practicum.

Note: The practicum must be at least 60 hours, which includes, for example, supervised teaching, observation, field visits, resources evaluation, team teaching, and volunteer tutoring etc. If a course undertaken has less than 60 hours practicum, teachers must demonstrate teaching experience equivalent to 60 hours, or must make up the difference in duration by individually organising a supervised practicum. Appropriate documentation of such should be kept.

All assessment must be undertaken by assessors who meet the requirements specified in the Standards for Registered Training Organisations or the Australian Quality Training Framework (AQTF) in effect at the time at which assessment is conducted. This includes the necessary assessment competencies determined by the National Skills Standards Council (NSSC) or its successors.

With the introduction of the new business model (NBM), the use of CSWE is no longer mandated. Instead service providers are given flexibility to use an accredited or non-accredited curriculum that best meets their students' needs, subject to approval by the department.

The introduction of multiple curricula and non-accredited training delivery has meant there is no longer consistency in terms of the teacher qualifications delivering the program. Table 14 outlines the teacher qualification requirements for the three most common curricula delivered by AMEP in the 2017-20 contract. To ensure a minimum standard of training qualification across all accredited and non-accredited delivery, the department included minimum teacher qualification requirements in the contract. These mandatory teacher qualifications are based on the teacher qualification requirements for CSWE (2013):

- Personnel teaching in the Pre-Employment English Stream: an Australian undergraduate degree or equivalent and a post graduate TESOL Qualification in adult education.
- Personnel teaching in the Social English Stream: Australian undergraduate degree or equivalent and is enrolled in a post graduate TESOL course in adult education.
- Personnel delivering tuition under a curriculum must satisfy any qualification requirements as part of the licensing agreement for that curriculum.

The department contracts a quality assurance (QA) provider to check that AMEP teaching staff possess the qualifications required by the contract for each tuition stream.

Table 14: Teacher qualification requirements by AMEP main curricula³²

REQUIRED TEACHER QUALIFICATIONS	CSWE	EAL FRAMEWORK	CSL
Australian undergraduate degree or equivalent	Required	Required	Required
Postgraduate TESOL	Required (if above is not an education degree with TESOL major).	Required (if above is not an education degree with TESOL major).	Substitutes possible. See below.
Teaching Practicum	At least 60 hours.	At least 60 hours.	Required.
Substitute for TESOL qualification	Not permitted.	Not permitted.	—At least 100 hours teaching ESL or Adult Literacy and Numeracy <i>or</i> —A Specialist Adult Literacy qualification <i>and</i> any LLN scholarship courses or recognised specialist TESOL qualification

³² For more details and other curricula, please see AMEP Curricula and teacher and assessor qualifications guide (LWA 2018).

6.2.2 Teacher qualification standards are important to the quality of the AMEP

Six service providers explicitly stated that regulation of teacher qualifications in AMEP was vital to the quality of the program. Figure 29 shows that 82 per cent of teachers agreed that a postgraduate TESOL qualification should be required to teach Pre-Employment English and 67 per cent agreed that enrolment in a TESOL qualification was beneficial for teaching Social English.

In spite of strong support for highly qualified teachers in AMEP, stakeholders identified several areas where less stringent teacher qualifications would aid the recruitment of teachers. Two service providers reported that the lower qualification requirement for Social English allowed new teachers to gain experience. Four service providers and four community organisations noted the difficulty of recruiting qualified teachers in regional areas and indicated that some flexibility in qualification requirements would make this easier.

The lesser qualification requirement for Social English Stream was, however, criticised by the Australian Council of TESOL Associations (ACTA), two service providers and a community organisation as detrimental to the quality of the program.

The instruction of the Social English Stream by unqualified teachers does not address the needs and interests of particularly vulnerable clients. Language teaching is a specialised field requiring knowledge of Teaching English as a Second Language (TESOL) methodology

gained through postgraduate TESOL qualifications and teaching experience.

—Community organisation

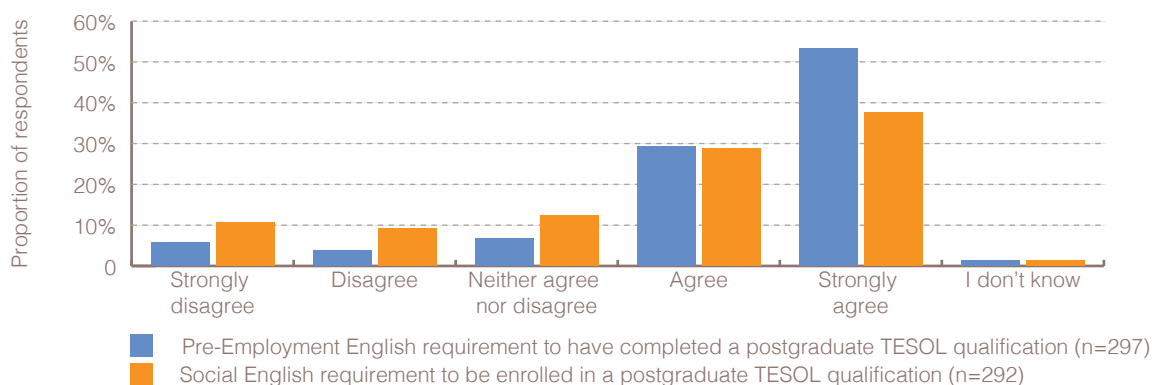
Figure 29 shows the number of teacher survey respondents who agree that the requirement for Social English teachers to be enrolled in a TESOL qualification is beneficial. This number is lower than for those who agree with the requirement for Pre-Employment English teachers to have completed this qualification. This discrepancy could suggest either that teachers believe that being enrolled rather than qualified is insufficient (i.e. Social English teachers should possess the qualification), or that the requirement to be enrolled is excessive (i.e. the qualification is not necessary to teach in Social English). Based on teacher interviews, surveys and the ACTA submission to the evaluation, Social Compass believes that this lower approval rating is more likely to indicate that some teachers believe that Social English should be taught by teachers who have completed the TESOL qualification.

In the teacher survey, seven teachers chose to comment specifically about the different requirements for Pre-Employment and Social English. All seven were of the view that qualifications for Social English should match the requirements for Pre-Employment English.³⁴

Key finding:

AMEP teachers should hold appropriate qualifications. However, the high level of qualifications required to teach AMEP curricula makes recruitment of teachers in regional areas more challenging.

Figure 29: Teacher survey: benefits of postgraduate TESOL qualifications for teaching Social and Pre-Employment English³³



³³ The question posed was, 'To what extent do you agree that the following teacher qualification requirements are beneficial for the [AMEP]?'

³⁴ The teacher survey did not specifically ask teachers to comment on the different requirements for the two streams. These comments emerged from broader questions about teacher qualifications.

6.2.3 Stakeholders are confused about which qualifications are recognised

The requirement for a post-graduate TESOL qualification is not new to the AMEP. However, the introduction of minimum qualifications stipulated in the contract, and the quality assurance process associated with reviewing the qualifications, has caused confusion and concern amongst service providers. The non-recognition of overseas TESOL qualifications and the definition of the term 'adult education' were two issues of particular concern for service providers and teachers. The QA process resulted in the identification of experienced AMEP teachers whose qualifications did not meet the requirements.

The department responded to service provider concerns prior to the commencement of the NBM contract by identifying the TESOL qualifications deemed to be acceptable for teaching in the AMEP. In August 2018 the department introduced a grace period for contractual requirements pertaining to teacher qualifications. The grace period was initially set until October 2018 but has since been extended until the end of the contract.

Despite the grace period and attempts to clarify qualification requirements, anxiety remains among service providers and teachers about the lack of clarity surrounding qualification requirements. Five service providers and ACTA expressed concern about this continuing confusion, making particular reference to overseas qualifications that were no longer deemed eligible by the AMEP QA provider.

The grace period for teacher qualifications has caused confusion and anxiety because conflicting advice has been provided in relation to overseas qualifications and acceptable equivalent qualifications.

—AMEP service provider

ACTA and one service provider noted that the *AMEP Curricula and Teacher and Assessor Qualifications Guide* (the Guide) only lists qualifications that are currently taught in Australian universities and not those that have since changed name.

The Guide states that no single institution in Australia provides a definitive assessment or recognition of overseas TESOL qualifications. Two responses³⁵ to the Guide indicated that, in the absence of a comprehensive register of eligible overseas qualifications, service providers should be supported with a methodology to assess the suitability of prospective teachers.

6.2.4 Upgrades to the Certificate IV in Training and Assessment have compounded confusions about teacher qualification requirements in the AMEP

AMEP teachers have recently faced changes relating to the Certificate IV in Training and Assessment (Cert IV TAE). Although not directly related to the NBM, this issue has added to confusion and uncertainty regarding teacher qualification requirements.

The *Standards for Registered Training Organisations (RTOs) 2015* (the Standards) ensure that nationally recognised training across the VET system in Australia is delivered by appropriately qualified personnel. The Standards require VET trainers and assessors delivering nationally recognised training to hold, at minimum, a Cert IV TAE. In 2016, the Training and Education Training Package was updated to include two new core units in the Cert IV TAE, as well as an additional unit to the assessor skill set. Subsequently, the Standards have been amended to reflect the changes to the trainer and assessor credential requirements. Changes take effect on 1 July 2019.

Holders of the previous Cert IV TAE and the assessor qualifications are required to upgrade their qualification with relevant units of competency. For teachers with diplomas or a higher-level qualification in adult education there are no changes to the requirements in the Standards; they are still required to have current industry skills as well as knowledge in training and learning. Whether a higher-level qualification meets the requirements of the Standards is determined by the teacher's RTO and audited by ASQA or one of the two state-based VET regulators, VRQA or TAC WA.

³⁵ Data provided by the department.

Some AMEP teachers reported that they have been required by their employer to complete or upgrade their qualification, despite believing that their TESOL qualification continues to meet the requirements of the Standards. Others reported that their RTO did not require them to undertake gap training based on their TESOL qualification. Of the teachers who responded to the evaluation survey, 92 commented specifically on the requirement to have the Cert IV TAE qualification. Only three of these comments were positive. Teachers expressed frustration regarding the time, energy and money that they had to invest in either completing or upgrading their Cert IV TAE qualification. Teachers argued that the teaching qualifications required to teach in AMEP were sufficient and that the Cert IV TAE was unnecessary and not relevant to teaching EAL.

Although the Cert IV TAE upgrade is not connected to the current AMEP contract, it is an added stressor for teachers who may have already been adversely affected by NBM changes. The intersection of the qualification requirements imposed by the AMEP contract, the curriculum and the VET sector is complex. AMEP teachers may not always clearly distinguish between changes to the contract, broader legislative changes or the decisions of their employer RTO. The decision of an AMEP service provider to determine if their teachers meet the trainer and assessor credential requirements under the Standards is not regulated by the department and is therefore an issue that needs to be resolved between AMEP teachers and their employers.

6.2.5 Quality Assurance of curriculum teacher requirements is being duplicated

As RTOs, AMEP service providers must comply with the *Standards for Registered Training Organisations* (2015) and are audited by ASQA or one of the relevant state-based VET regulators (VRQA or TAC WA). These audits include an assessment of compliance with the teacher qualifications outlined in

curriculum licensing. ASQA and one of the two state-based VET regulators, however, do not audit teacher qualifications for non-accredited training delivery.

Two service providers explicitly stated that the curriculum qualification requirements assessed by ASQA should be considered sufficient and that it was not necessary for teacher qualifications to be mandated by the AMEP contract and audited by the AMEP QA provider.

Key finding:

To ensure consistency of teaching quality with introduction of multiple curricula and non-accredited training, the department incorporated additional teacher qualifications in the AMEP contract. The introduction of the additional teacher qualifications and the quality assurance process to monitor compliance resulted in:

- *a different interpretation of which TESOL qualifications are eligible for the AMEP*
 - *the initial disqualification of some experienced AMEP teachers*
 - *confusion about which TESOL qualifications meet AMEP requirements.*
-

Recommendation – Teacher qualifications

Teacher qualifications for accredited AMEP curricula should be stipulated by curriculum licensing and regulations governing Registered Training Organisations, not by the contract between the government and the service provider.

Where the AMEP is delivered using non-accredited curricula, teacher qualifications should be stipulated in the contract.

6.3 Measuring student progression

6.3.1 Introduction

This evaluation was tasked with determining the appropriateness, effectiveness and practicality of the assessment process in the Adult Migrant English Program (AMEP), including the practice of conducting initial, progressive and exit assessments using the Australian Core Skills Framework (ACSF) as a benchmark.

Prior to the AMEP new business model (NBM) implementation in July 2017, the AMEP used the International Second Language Proficiency Ratings (ISLPR) to assess students entering and exiting the program. Student progression was measured using Certificates in Spoken and Written English (CSWE) curriculum unit completion rates. CSWE curriculum unit completion rates were also used as an indicator of AMEP provider performance.

The 2015 ACIL Allen evaluation of AMEP noted that the ISLPR was appropriate for use in the AMEP and should continue to be used. It also recommended that the potential benefits of other assessment instruments such as the International English Language Testing System (IELTS) and the Test of English as a Foreign Language (TOEFL) be considered (ACIL Allen 2015a, p.xii).

ACIL Allen also recommended that the ACSF be considered as a means of facilitating the pathway of AMEP students to other VET programs such as the Skills for Education and Employment (SEE) program. The ACSF is used across the VET Sector to provide a standard framework for measuring language, literacy and numeracy (LLN) across the sector. The *National Foundation Skills Strategy for Adults* notes that 'Australian governments agree that the ACSF will be used as the standard framework for measuring LLN and will support the use of tools based on the ACSF' (SCOTese 2012, p.15).

Given its position as the primary benchmark for LLN in the Australian vocational education and training (VET) sector, ACIL Allen noted that the ACSF would likely provide the optimal continuity and coverage from a national perspective. However, ACIL Allen also noted that there was insufficient evidence to determine if

the ACSF was appropriate 'to test second language proficiency' of the specific cohorts of the AMEP program (ACIL Allen 2015b, p.xi).

6.3.2 The Australian Core Skills Framework and its introduction into AMEP

The ACSF is 'a tool which assists both specialist and non-specialist English language, literacy and numeracy (LLN) practitioners to describe an individual's performance in the five core skills of learning, reading, writing, oral communication and numeracy' (DET 2018a). It was developed in 2008, replacing the National Reporting System, and can be used to:

- benchmark an individual's core skills performance
- map core skills requirements in education and training
- tailor approaches to teaching and learning
- describe core skills relevant to the workplace and employment
- inform decisions regarding funding and referrals.

The Australian Government funded the development of the ACSF to support strategies aimed at improving adult LLN for the workforce.

In 2012 the ACSF was revised to include a Pre Level 1 Supplement designed to cater for people with very low levels of English language proficiency. A more detailed version of the Pre Level 1 supplement was issued in 2017. This edition of the ACSF distinguishes between Pre Level 1 A and 1 B to more accurately describe the progress of low-level students.

The government's decision to give service providers a choice of curriculum (rather than to continue to mandate CSWE) meant that there was no longer standardised assessment and reporting across the program. In July 2017, as part of the NBM, the government introduced the ACSF to AMEP. The ACSF replaced the ISLPR and curriculum completion for reporting AMEP students' initial, progressive and exit levels and measuring provider performance.

The Service Provider Instructions (SPIs) direct service providers to 'undertake Client assessments against the ACSF'.³⁶ Students are assessed across

³⁶ The quality assurance provider has pointed out that the correct terminology should be 'report against the ACSF' as the ACSF is not an assessment tool but a reporting framework.

Table 15: ACSF core skills and indicators

CORE SKILL	LEARNING		READING		WRITING		ORAL COMMUNICATION	
Indicator Number	L.01	L.02	R.03	R.04	W.05	W.06	O.07	O.08

the four core skills of learning, reading, writing and oral communication. The AMEP does not report on students' proficiency in numeracy. Each ACSF level consists of two indicators for each of the core skills. These indicators are referred to as shown in Table 15.

The department requires providers to report on student performance after every 200 hours they spend in the program. This measuring of student progress before completion of their 510 hours represents an important accountability measure for such a large government program. A justification for the change of reporting process was to align it with the SEE program, which also reports student progress at 200-hour intervals. One of the four key performance indicators under the NBM requires service providers to demonstrate that 80 per cent of students are improving by a minimum of one ACSF indicator per 200 hours of tuition.

6.3.3 The ACSF is useful as a benchmarking and reporting tool

The introduction of multiple curricula under the NBM means that the previous system of comparing progress across multiple providers and cohorts using CSWE curriculum units is no longer possible. The ACSF provides a common reporting framework across different curricula. From the department's perspective, the ACSF is also of value as it aligns AMEP reporting to that of the SEE program. This alignment is examined in section 9.2.

Seven of the 15 service providers/subcontractors who participated in the evaluation acknowledged that the introduction of the ACSF as a reporting and benchmarking tool had some benefit for AMEP. These providers considered that ACSF provides a universal and consistent reporting tool across the program.

The introduction of the ACSF in the NBM has been a positive initiative. The ACSF is understood by the VET community and aligns with VET frameworks as well as the SEE program. For AMEP clients, this alignment allows them to set clear targets, and unlike the previous reporting framework, it is widely recognised outside the AMEP.

—AMEP service provider

Key finding:

Some AMEP service providers and other stakeholders identified the value of the ACSF as a standardised reporting/benchmarking tool.

6.3.4 Service providers and teachers are concerned that the ACSF is not appropriate for learners of English as an Additional Language (EAL)

Despite acceptance of the need for a consistent benchmarking tool across the AMEP, a clear majority of teachers, and a smaller majority of service providers, reported that the ACSF does not meet the needs of an EAL migrant population. An overview of service provider concerns is shown in Table 16.

The Australian Council of TESOL³⁷ Associations (ACTA), as well as eight of the AMEP service providers, explicitly stated that either the ACSF was not suitable for the EAL cohort or that another tool

³⁷ Teaching English to Speakers of Other Languages

Table 16: Shortcomings of the ACSF as identified by service provider*

	CURRICULUM ASSESSMENTS DO NOT ALIGN	THE ACSF IS INAPPROPRIATE IN AN EAL CONTEXT	INITIAL ASSESSMENTS ARE TOO LONG	THERE IS NO BENEFIT FOR STUDENT LEARNING
Service Provider 1			✓	
Service Provider 2	✓	✓		
Service Provider 3	✓			✓
Service Provider 4	✓			✓
Service Provider 5	✓	✓	✓	✓
Service Provider 6	✓			✓
Service Provider 7	✓	✓	✓	✓
Service Provider 8	✓			
Service Provider 9	✓		✓	
Service Provider 10	✓		✓	
Service Provider 11	✓	✓		
Service Provider 12	✓	✓		
Service Provider 13	✓	✓		✓
Service Provider 14	✓			✓
Service Provider 15	✓			✓

* These themes emerged in interviews and submissions. Service providers were not specifically asked about each issue. This data is therefore likely to understate the number of service providers sharing each view.

was more suitable. This includes four of the service providers who reported that the ACSF had benefit as a standardised reporting/benchmarking framework. These teachers and service providers are concerned that the ACSF was initially developed to describe the language, literacy and numeracy skills of native English speakers. They therefore do not consider it appropriate to describe the language skills of EAL students, as learning a new language is a different process to becoming literate in one's native language.

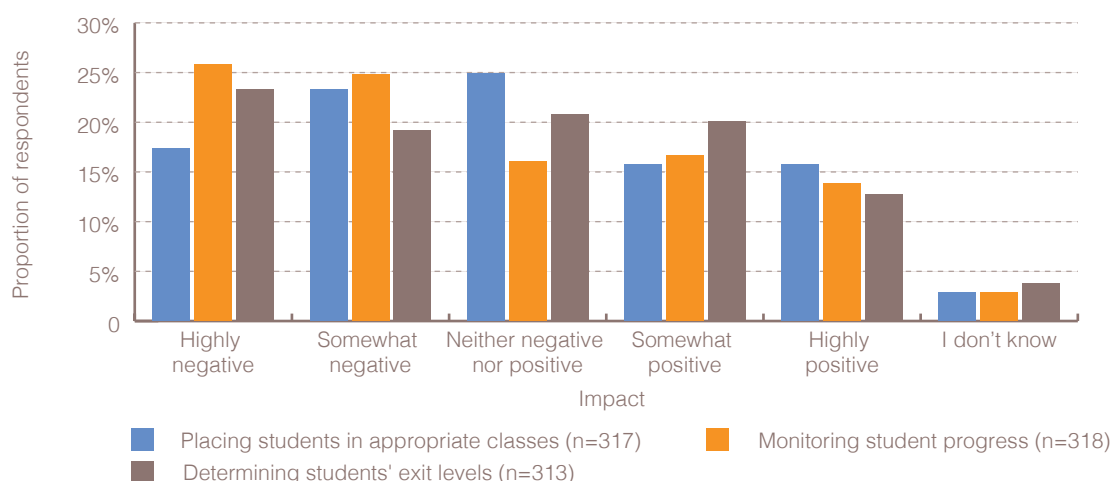
ACSF is not an appropriate tool for assessing progress for English language learners as it does not take into account the processes involved in second language acquisition for adult learners.

—AMEP service provider

The teacher survey asked respondents if they had any comments to make about the ACSF as a reporting tool. In response, 42 teachers explicitly stated that the ACSF was not appropriate to describe the progress of EAL students and/or that it is inappropriate for AMEP students. Many of these comments referenced their belief that the ACSF was designed specifically to measure the language, literacy and numeracy skills of English speakers.

However, not all stakeholders shared the view that the ACSF is inappropriate for EAL students. One LLN specialist who had been involved in creating the ACSF disputed the argument that the ACSF was not suitable for EAL students. This specialist stated that EAL contexts were considered by the team that developed the ACSF. During the evaluation

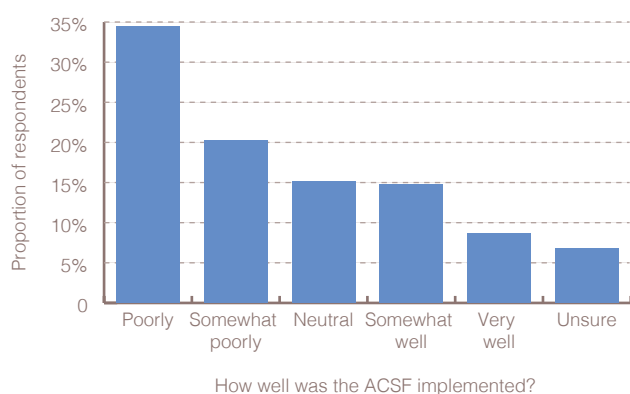
Figure 30: Teacher survey: impact of ACSF on placing students, monitoring student progress and determining exit levels



process, interviewees consistently advised that there is a substantial professional divide between the TESOL and LLN communities over approaches to understanding language acquisition, and it is likely this difference is reflected in the attitudes towards the appropriateness of the ACSF for EAL learners. While it is not in the scope of this evaluation to adjudicate this issue, the recommendation at the end of this section proposes a way forward.

Figure 30 shows the overall assessment by AMEP teachers of the appropriateness of the ACSF as a tool for AMEP student initial, progressive and exit assessments. While the results are generally evenly distributed across the spectrum of responses, teachers' attitudes tend towards the negative when considering the efficacy of the ACSF to determine initial placement levels and exit levels. Fifty-one per cent disagreed or strongly disagreed that the ACSF was effective for monitoring student progress compared to 31 per cent who agreed or strongly agreed.

Figure 31: Teacher survey: assessment of implementation of the ACSF (n=311)



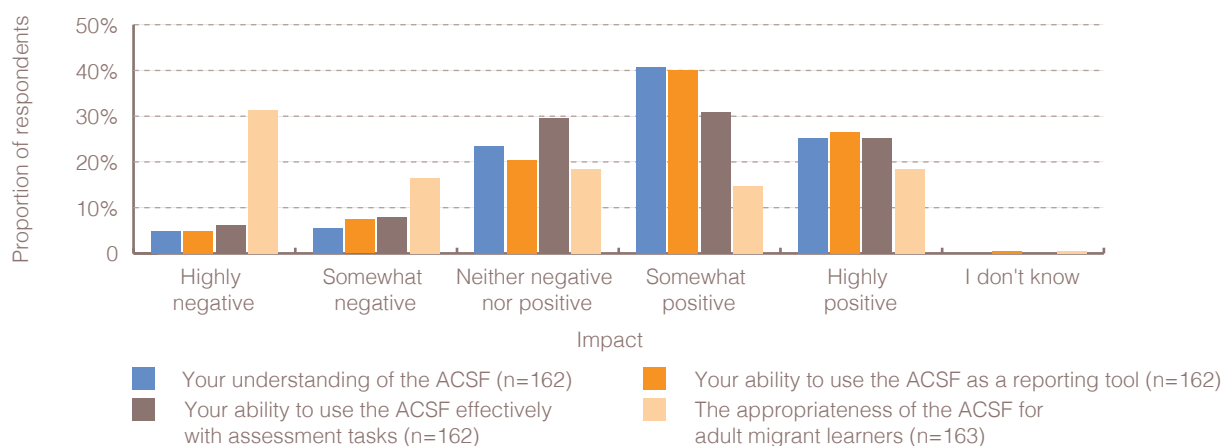
6.3.5 The ACSF was introduced to the AMEP without sufficient implementation time and training

The introduction of the ACSF was a major change to the AMEP. Immediate implementation from the beginning of the contract, rather than a gradual phase-in process, caused challenges for providers and teachers who were unfamiliar with the framework. The department has identified this abrupt implementation and lack of professional development for teachers as factors contributing to implementation challenges. Two service providers, whose teachers had experience in the SEE program (and therefore the ACSF), reported that they were better positioned to make the transition to the ACSF within the AMEP. This was confirmed by service provider representatives on the evaluation Advisory Committee.

As part of the survey, teachers were asked to rate the implementation of the ACSF. As shown in Figure 31, 54 per cent felt the implementation was poor.

When asked if the department had taken steps to improve ACSF implementation, of the 169 respondents who had identified that implementation was poor, only 28 per cent identified some improvement. Eleven per cent indicated that that it was too early to tell, 29 per cent that the steps taken were not working, and 18 per cent felt that no steps had been taken. Fifteen per cent did not know.

Figure 32: Teacher survey: impact of the ACSF training workshops



Forty-one per cent of survey teachers indicated that they had participated in ACSF training sessions delivered by the quality assurance provider. Figure 32 shows that more than half of these participants felt that the training improved their understanding of and ability to use the ACSF. Despite the training, however, 48 per cent of teachers remained negative about the appropriateness of the ACSF for adult migrant learners.

These results suggest that while poor implementation and lack of training have contributed to the dissatisfaction with the ACSF, teachers are also concerned about more fundamental issues.

confusion, distress and increased workload for teachers. A review of AMEP curricula undertaken by the department indicates that all AMEP curricula provide a 'broad mapping' to the ACSF and that these curricula allow for reporting against the ACSF. However, it appears that this mapping is inadequate, as 14 out of 15 service providers participating in the evaluation pointed out that curriculum assessments do not align well with the ACSF indicators and that two sets of assessments are often required in order to fulfil curriculum and program reporting requirements.

Given that no curricula currently available maps directly to the ACSF, extra assessments are always required.

—AMEP service provider

Key finding:

While poor implementation has contributed to problems with the use of the ACSF within the AMEP, teachers and service providers have more fundamental concerns about its appropriateness.

6.3.6 Progressive assessment against the ACSF every 200 hours is resulting in an impractical duplication of assessment

The ACSF is a reporting framework, not a curriculum. The requirement to report student progress against the ACSF, in addition to the VET sector requirement to assess students against the curriculum, is causing

The evaluation has been advised that extra assessments should not be necessary to fulfil both requirements. It was pointed out that curriculum tasks in the Assessment Task Bank (ATB) are mapped to the ACSF and should therefore be sufficient to both conduct assessments as per the curriculum and report against the ACSF. Teachers' experiences, however, do not support this claim. Respondents to the teacher survey agreed with the service provider view that curriculum assessments are not sufficient to report against the ACSF. Fifty-four teachers, when asked about the impact of the ACSF on the AMEP, mentioned the lack of alignment between the ACSF and their curriculum and/or the need for two layers of assessment in the AMEP.

It is challenging to assess and report using two tools. We teach a curriculum which is broad and well designed and then assess against the curriculum to determine student progress. This should be sufficient to demonstrate students' progress in English language. Having a second reporting system (ACSF) which does not easily align to the curriculum contributes to extra work load for teachers.

—Teacher survey respondent

Sixty-eight per cent of teachers indicated that the ACSF has required many adjustments to the curriculum and 82 per cent of teachers identified a negative impact on administrative workload.

Key finding:

Teachers and service providers agree that the lack of alignment between curriculum and the ACSF is resulting in duplication of assessment and increased administration.

6.3.7 The ACSF is not practical and may not be appropriate for showing student progress at 200 hours

A majority of teachers surveyed (61 per cent) disagreed or strongly disagreed that it is appropriate to report learning outcomes against the ACSF every 200 hours. Data obtained from the teacher interviews and survey comments indicates that teachers feel that 200 hours is too short a period to expect students to progress an entire level on any one ACSF indicator. One teacher gave an example of one student who was making good progress across several of the ACSF indicators, but not enough to reach the next level in any of them.

On the other hand, departmental data shows that service providers are meeting the key performance indicator (KPI) of 80 per cent of students achieving progress against one ACSF indicator every 200 hours.

Figure 33 shows that the majority of teachers consider the ACSF to be neither effective nor appropriate to describe student progress. They also disagreed with the proposition that it can accommodate the different abilities and contexts of EAL students.

Figure 33: Teacher survey: validity, reliability and flexibility of the ACSF for teaching EAL students

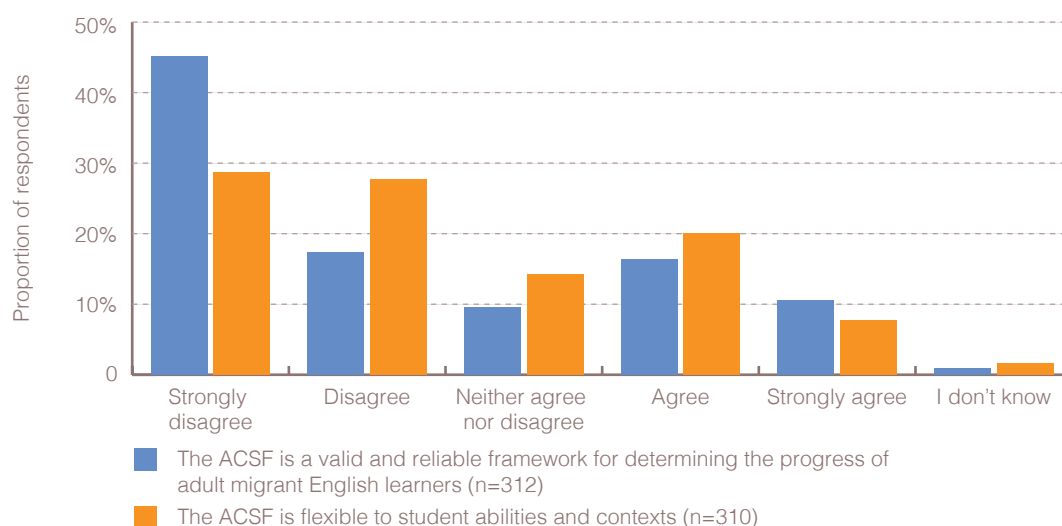
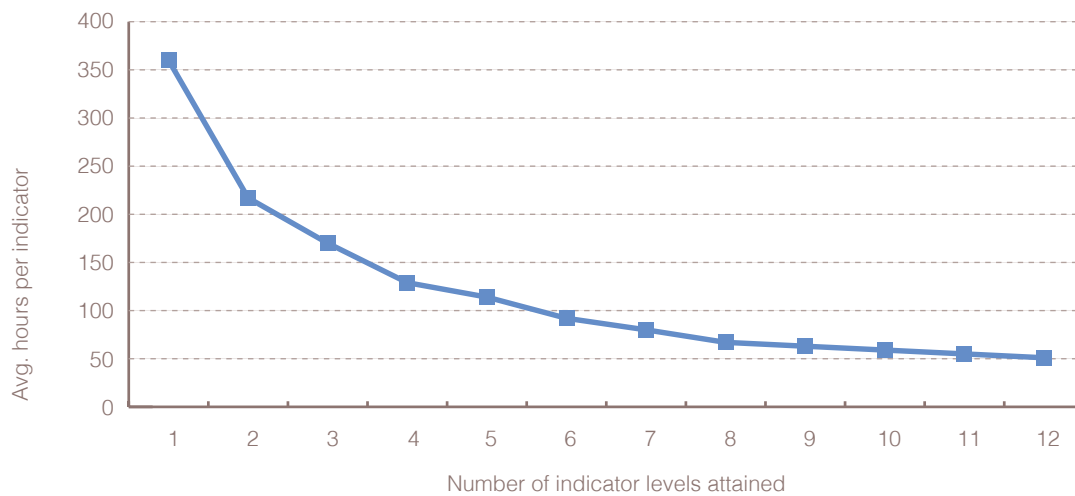


Figure 34: As the number of indicators attained increases, the average number of hours taken per indicator decreases



Eight ACSF indicators are used in the AMEP to describe the different skills in each level. At any given time, a student could be working on skills described by multiple indicators; they do not progress in a linear way from one indicator to the next. Evidence of progress can be similarly non-linear—while it might take a long time for a student to show progress on one indicator, they might not take an equally long time to show progress against other indicators.

Figure 34 shows that, on average, it takes a student 350 hours to attain one level on one ACSF indicator. However, during that 350 hours the student may also be making progress on other indicators. Therefore, the amount of additional time it takes to progress by a level on a second and third indicator is generally less than the time taken to achieve the first.³⁸ As a student spends longer in the AMEP, the time taken to progress on more indicators decreases. For example, for the students that have attained four indicators the average time taken is 516 hours, with an average of 129 hours per indicator. This acceleration of indicator attainment over time supports the claims by teachers that 200 hours is too soon to assess the first indicator. For further discussion, see section 7.1.

6.3.8 There is a discrepancy between ACSF reporting and ISLPR reporting

The ISLPR was a well-accepted instrument used to assess proficiency in the AMEP from the late 1970s until the introduction of the NBM. The ACIL Allen evaluation used ISLPR results to show that, in general, AMEP students made more progress in speaking and listening than in reading and writing. Social Compass has found that there is enough NBM data describing student progress against all ACSF indicators to make a comparison with this ACIL Allen finding.

To make a comparison with this ACIL Allen finding, and assess student progress under the NBM, it is necessary to compare a student's initial ACSF assessment with at least one subsequent assessment. Given that reporting against the ACSF is still relatively new to the NBM, many students do not yet have an initial and subsequent assessment reported against this framework. As of March 2019, approximately 20 000 students had an initial and at least one subsequent assessment reported against the ACSF.³⁹ Although KPI 2 only requires reporting against one indicator, the data for this group shows that for around 90 per cent of these 20 000 students, all eight indicators had been reported on.

³⁸ For the purposes of this evaluation student progress is measured in the number of levels that a student advances on one or more indicators. For example, a student who progresses by two levels could have progressed by one level on two indicators, or by two levels on one indicator. The first possibility is the more likely to occur.

³⁹ The department dataset includes many students who have not yet had both an initial and subsequent assessment. These students are omitted from the analysis below.

Given this substantial cohort of students who have recorded ACSF scores for most indicators, it is possible to broadly compare the ACSF records against ISLPR results. While the ACIL Allen evaluation, using ISLPR data, showed that students generally made more progress in speaking and listening than in reading and writing, the ACSF scores of this 20 000-student cohort show that students are more likely to show progress in reading and writing than in oral communication. Figure 35 shows the progress made by this cohort according to each ACSF indicator.

The reasons for this contrast between ISLPR and ACSF results are not clear. It could be that some unique characteristic of the current cohort makes it more likely that they make more progress in reading and writing. Another explanation could be that teachers are now emphasising reading and writing over oral communication in the NBM. An alternative explanation is that there is a characteristic of testing for ACSF reporting purposes that makes student progression in reading and writing easier to demonstrate. Perhaps it is easier for teachers to gather evidence for these two skills for compliance purposes and it is therefore easier to prove student progression against these indicators. If the latter is the case, it calls into question the appropriateness and effectiveness of the current implementation of the framework.

Key finding:

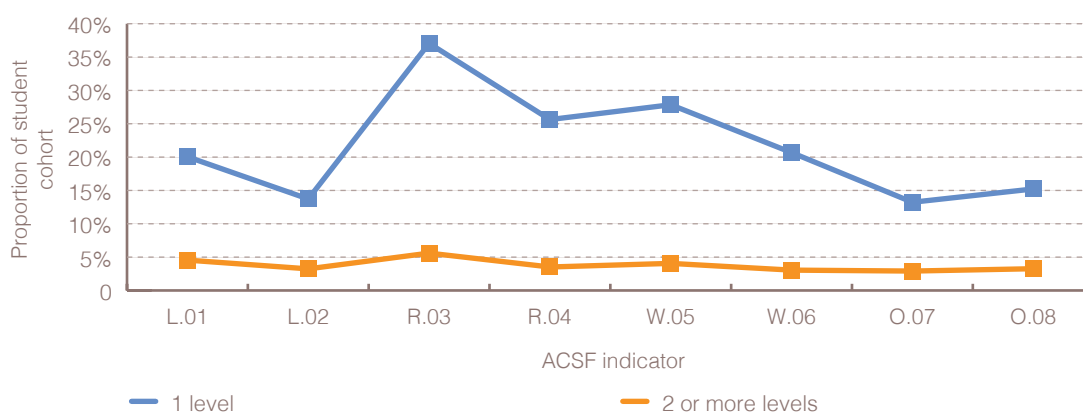
Based on teacher and service provider experience, analysis of program data, and comparison with ISLPR learning progress data, the current system of reporting student progress against the ACSF every 200 hours is not practical and may not be appropriate or effective.

6.3.9 Reporting against the ACSF using curriculum progress

The approach to measuring progression under the previous contract was through CSWE 2013 curriculum progress, rather than assessment against an external benchmark. Using curriculum competencies attained allows for a high level of sensitivity to student progress. Each CSWE unit makes a distinct contribution towards a student's progress to the next CSWE level. The total number of competencies a student has successfully completed provides a realistic indicator of how far they have progressed towards the next CSWE level.

Using curriculum competencies to report progress is appropriate, practical and effective. This has been demonstrated in the analysis of humanitarian visa holder student progress compared to family and skilled students in the context of need for the Special

Figure 35: Proportion of student cohort showing progress against each ACSF indicator



Preparatory Program (see Appendix A). It does not require additional assessment and administration. Accuracy of assessment is already regulated by ASQA or the appropriate state equivalent. ACTA and other stakeholders have recommended that reporting of completed curriculum competencies be reinstated to monitor student progress in the AMEP. To ensure standardised benchmarking across the program, these curriculum competencies would have to be thoroughly and accurately mapped to the ACSF.

The evaluation Advisory Committee discussed and supported this approach. They also identified a range of options for its implementation. They advised that it was not practical for each service provider to undertake its own mapping as this would not lead to consistent reporting outcomes. They advised that the best approach would be for the department to coordinate the mapping project, in consultation with curriculum owners and service providers.

Key finding:

Reporting curriculum competency attainments is more appropriate, effective and practical for monitoring student progress than reporting directly against the ACSF.

6.3.10 Appropriateness of the ACSF for initial assessments

There is considerable difference of opinion among stakeholders on the use of the ACSF in the initial assessment process. Some teachers and service providers, and the peak organisation ACTA, expressed the view that the ISLPR was a more appropriate tool to assess EAL students as they entered the program.

The current interpretation of the ACSF needs to be redefined for a pre-functional English audience. ISLPR to be considered as more applicable for this cohort of pre-functional English learners.

—AMEP service provider

Divided opinion on the suitability of the ACSF for AMEP initial assessments is likely to be explained in part by the pedagogical divide between the LLN and TESOL professions. This hypothesis can be tested by sorting teacher survey data according to how much experience an AMEP teacher has in teaching the SEE program, which has an LLN focus. Figures 36 and 37 show that teachers with eight or more years of experience teaching in the AMEP are more likely to view the ACSF as inappropriate for initial assessments

Figure 36: Teacher survey: impact of the ACSF on initial assessment according to years of experience in AMEP (n=313)

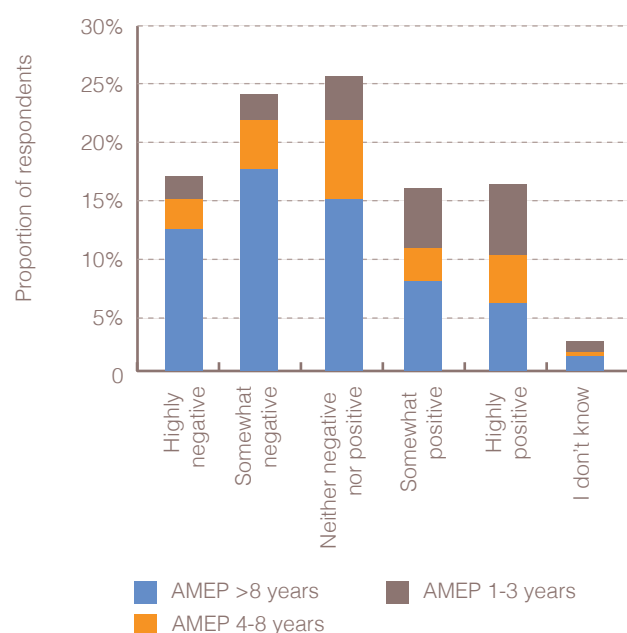
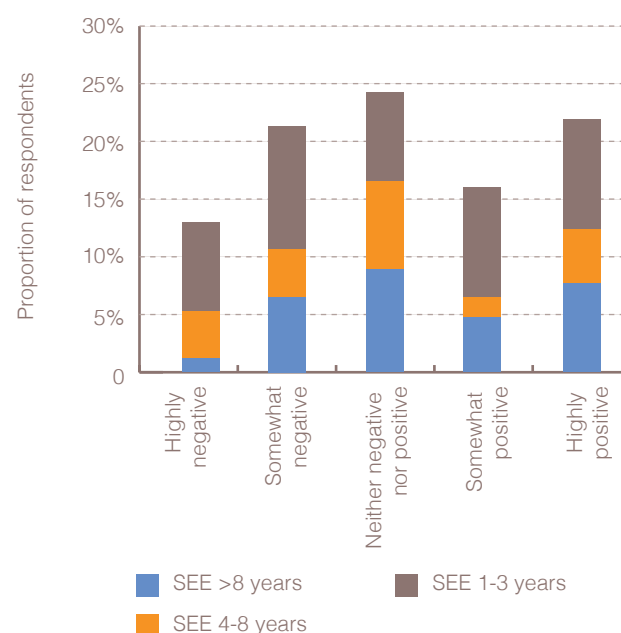


Figure 37: Teacher survey: impact of the ACSF on initial assessment according to years of experience in SEE (n=169)



of EAL learners. Those who have spent more time teaching SEE are more positive about the effectiveness of the ACSF for initial assessments in the AMEP.

Four service providers also reported that the initial assessment is very long, sometimes taking up to three hours to complete, which is stressful for students.

In contrast, the evaluation Advisory Committee was of the view that the initial assessments made against the ACSF provided a robust and comprehensive assessment of student abilities. They highlighted the considerable investment already made to improve the ACSF initial assessment. A streamlined process for initial assessments has been developed by the department in consultation with the quality assurance provider and service providers. This streamlined assessment kit reduces the length of the initial assessment process. The process has been trialled and has received positive feedback from stakeholders.

The imminent introduction of the streamlined Initial Assessment kit is a welcome solution to the onerous entry interview process which is often overwhelming for clients.

—AMEP service provider

The streamlined initial assessment kit was implemented across all service providers in June 2019.

The evaluation Advisory Committee also considered the proposal of allowing service providers the choice of retaining the ACSF initial assessment or returning to the ISLPR. They advised that this would add additional complexity to the mapping processes and that the program should retain a unified approach to initial assessments at this stage. Committee members also warned that making yet another major change would have negative implications for staff who are not familiar with the ISLPR. It is also worth noting that ISLPR is a proprietary model, and no longer accepted by the Department of Home Affairs as proof of English proficiency.

Key finding:

There is disagreement among stakeholders as to whether the ACSF should be retained for initial assessments or if the ISLPR or another suitable instrument should be (re)introduced.

It is beyond the scope of this evaluation to adjudicate this issue of the appropriateness of the ACSF for the initial assessment and further expert review is required.

Recommendation – Australian Core Skills Framework (ACSF)

The department should establish an ACSF review team that includes:

- TESOL experts
- ACSF experts/creators
- curriculum owners
- department representatives.

The ACSF review team should:

- *assess the appropriateness and effectiveness of the ACSF to describe the English proficiency of English as an Addition Language (EAL) students for the purposes of initial assessment and progress reporting*
- *identify potential modifications that will better describe learning progress for EAL students, or identify other tools that are more fit for purpose.*

Based on the outcomes of this assessment, the review team should oversee the detailed mapping of curricula to the ACSF.

Service providers should report student curriculum progress to the department. Detailed mapping of curricula to the ACSF will allow the department to convert these progress reports to an ACSF score for program reporting purposes.

PROVIDER PERFORMANCE

7.1 Key Performance Indicators

7.1.1 Introduction

The performance management process in the Adult Migrant English Program (AMEP) consists of the use of key performance indicators (KPIs) to ensure quality service provision in the AMEP.

Under the previous contract, service providers were subject to 13 KPIs (see Appendix B). The ACIL Allen evaluation (2015a, p.79) found that ‘some AMEP service providers consider the KPIs to be too numerous and too focused on formal assessment, which it is feared, may sometimes detract from language learning’. The transition to the new business model (NBM) saw the number of KPIs decrease to four. While there are fewer KPIs under the NBM, the importance of meeting the designated targets has been strengthened by linking performance failure to contractual default, remedy and termination clauses. The previous KPIs focused on completion of courses and attainment of certificates. The current contract holds providers to account for student participation and progress, as well as accuracy of provider reporting.

In this section, the four KPIs that are defined in the current contract are discussed in turn.

7.1.2 KPI 1: Participation

KPI 1: Ninety per cent of eligible clients who complete an initial AMEP assessment or are referred to AMEP Distance Learning actually commence in the program within 6 months.

According to the *Immigration (Education) Act 1971*, section 4C, an eligible migrant aged 18 years or over must register for the AMEP within six months of his/her visa commencement. Those aged under 18 years have 12 months to register. Migrants must commence their 510 hours within 12 months.

Departmental administrative data shows that 13 out of 14⁴⁰ service providers achieved KPI 1 in 2017-18.

Five service providers reported that the participation KPI is beyond their control. In some cases service providers administer an initial assessment, but the potential student may choose not to commence in AMEP. Students might not commence within the six months stipulated in the KPI because of family commitments, health issues or because they have to return temporarily overseas. These factors are outside the control of the service provider. In recognition of this concern, the department intends to modify KPI 1 to allow students to formally defer their commencement in the AMEP.

⁴⁰ There are 13 organisations contracted to deliver the AMEP across 58 contract regions. One of these organisations is contracted separately to deliver DL. This organisation is subject to separate performance management for each contract. Therefore a total of 14 contracts are subject to the KPIs.

An evaluation Advisory Committee member pointed out that KPI 1 does not measure the results of providers' promotion and recruitment activities.⁴¹ This shortcoming could be remedied by setting registration or enrolment targets for each contract region. The targets would reflect settlement patterns for that region using the government's settlement database and be informed by humanitarian and migration policy settings. The targets would need to be negotiated yearly and reflect government objectives for AMEP participation.

There is also evidence that service providers have lost access to databases of potential students. One service provider indicated that when the Immigration portfolio had responsibility for the AMEP, departmental staff had access to visa data on eligible AMEP clients. This information allowed providers to actively promote the AMEP to target clients from all visa streams. When the program was relocated to other portfolios, service providers lost access to this information. While Humanitarian Settlement Program (HSP) providers refer their clients to the AMEP, they only support migrants on humanitarian visas. Referral pathways have been further hampered by the removal of any reference to the AMEP in the Department of Home Affairs' Visa Grant Letters. The service provider identified the Visa Grant Letter as an important source of referrals, particularly for family visa holders. Advice from the department at the time of finalising this report was that this issue has been addressed. Visa Grant Letters have recently been revised to include information on the AMEP for eligible visa holders.

Key finding:

A KPI that reinforces the importance of engagement with migrants from their first contact with the AMEP is appropriate.

7.1.3 KPI 2: Attainment

KPI 2: Eighty per cent of Clients in Pre-Employment and Social English Streams attain one Australian Core Skills Framework (ACSF) indicator per 200 hours of tuition.

The substantial public investment in the AMEP justifies a progress KPI that can be used to report program outcomes to government and the public. The use of the ACSF to report student progression every 200 hours aligns AMEP reporting with that of the Skills for Education and Employment (SEE) program.

Departmental administrative data shows that nine out of 14 service providers achieved KPI 2 in 2017-18. This figure increased to 13 out of 14 in 2018-19 (as of 30 April 2019).

Section 6.3 discusses the increased teacher and service provider workload under the NBM, which is in part the result of the efforts required to meet KPI 2. Evidence from teachers and service providers indicates that reporting student progress against the ACSF at 200-hour intervals is not practical. Reinstating reporting against curriculum assessments, which have been mapped to the ACSF, would have several advantages. It would remove the extra administration burden from teachers and should allow for more nuanced monitoring of student progression. The higher granularity of curriculum outcomes would also enable more comprehensive recording of student progress. It may also address the anomaly of disproportionate progress recorded against ACSF reading and writing indicators compared to oral communication.

Key finding:

The policy intent of KPI 2 is sound. Reporting curriculum outcomes and mapping these to the ACSF would improve the practicality and effectiveness of this KPI.

⁴¹ This was provided in the form of written feedback to Social Compass so was not discussed with other Advisory Committee members.

7.1.4 KPI 3: Timeliness

KPI 3: Ninety-five per cent of data recorded and reported within the required timeframes.

Following the introduction of the NBM, the existing AMEP Reporting and Management System (ARMS) was unable to accommodate new elements and reporting requirements of the program. Currently, providers continue to use ARMS, but must enter extra program data, including student attendance, student progress, child care attendance, and tuition streams into spreadsheets that must be submitted to the department.

Providers reported that this system is cumbersome and does not allow providers to access up-to-date AMEP data. The delay in implementing a centralised IMS has caused a large administrative burden and exacerbated the stresses relating to performance management.

A significant weakness has been the decommissioning of several ARMS reporting system mechanisms. The previous model was quicker to administer and had different milestone reporting requirements.

—AMEP service provider

The department has waived KPI 3 due to the delays in introducing any new, centralised IMS. Given the importance of quality data to monitor a large program such as the AMEP, the principle of a KPI related to timeliness of data collection and reporting is sound.

Key finding:

The lack of a robust information management system is a source of frustration for service providers and the department, and has resulted in cumbersome and time consuming remedial measures. This has justified the waiving of KPI 3.

7.1.5 KPI 4: Accurate Assessment

KPI 4: Eighty per cent of client assessment outcomes are accurate against the ACSF.

Quality assurance (QA) data from the department shows that five out of 14 service providers achieved KPI 4 in 2017-18. This figure increased to 10 out of 14 in 2018-19 (as at 30 April 2019).

The department contracts an external QA provider to measure KPI 4. The QA provider considers whether the service provider has applied the ACSF accurately, used assessment tasks appropriate to the student's level and provided enough evidence to substantiate the student's achievement of the ACSF indicators (DET 2018b).

The ACSF section of this report presents strong evidence that the current system of reporting student progress every 200 hours against the ACSF is impractical. Preparation of files for the QA verification process adds another layer of administration for teachers and providers, exacerbating the impracticality of the assessment and reporting process.

Figure 38 shows that over two thirds of surveyed teachers indicated that the administration and assessment associated with meeting these KPIs had a negative impact on their wellbeing.

Social Compass heard accounts of teachers taking stress leave, leaving their jobs or contacting their union for support. Thirteen teachers described instances of 'manipulating' student ACSF assessments by altering assessments, helping students or assigning a lower initial assessment score in order to facilitate reportable progress after 200 hours.

Also, the ACSF demands manipulation of the system in order to achieve requirements in the very limited time lecturers have to carry it out.

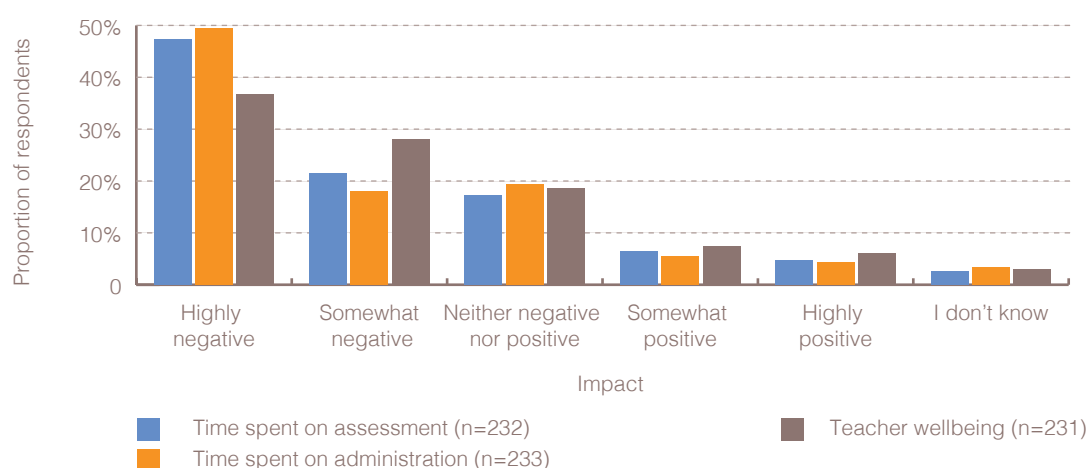
—Teacher survey respondent

One interviewee spoke of 'agonising' discussions with colleagues about the ethics of this practice but they felt that the unreasonable workloads created by the assessment process gave them no alternative. Increased teacher workloads have had serious implications for one service provider who reduced the contact hours for their teachers to give them more time to complete administrative tasks and reduce staff turnover.

[The workload is] so big we've actually reduced our contact hours for teachers. The industrial agreement says we can do 25, we've reduced that down to 20 so we could reduce our staff turnover which was massive. So [they]ve got an extra 5 [non-contact] hours a week. For an AMEP trainer that is about \$300 each person a week we're not seeing any face-to-face contact for.

—AMEP service provider

Figure 38: Teacher survey: impact of KPIs



Key finding:

Providing evidence of accurate assessment to meet KPI 4 necessitates extensive documentation. Preparation of files for verification has created unreasonable teacher workloads and is contributing to decreased teacher wellbeing.

Key finding:

The need for KPI 4 could be reviewed if the recommendation is adopted that progress reporting be based on curriculum outcomes mapped to the ACSF. ASQA (or the equivalent state body) already audits the quality and accuracy of curriculum assessment items.

Teachers and providers alike acknowledged the importance of reporting and accountability but identified the need for positive quality assurance processes that focus on improving teaching.

If high performing providers underwent less audit, providers would have more time to work on program continuous improvement and innovation, both of which are important parts of a quality assurance process.

—AMEP service provider

If the recommendation to report progress against the ACSF using curriculum outcomes mapped to the ACSF is adopted, KPI 4 would no longer be necessary. Curriculum assessments are already monitored for accuracy by the Australian Skills Quality Authority (ASQA) or the relevant state body.

KPI 2 already measures quality of service provision in terms of student progress. To further ensure teaching quality in the AMEP, opportunities could be explored to support service provider engagement in continuous improvement strategies. For example, service providers could be encouraged to implement the findings of the proposed communities of practice (see section 9.3). Departmental data could be used to provide feedback to service providers about the learning progress of particular cohorts in their contract region (as demonstrated in section 9.2). Service providers could be incentivised to provide professional development for teachers that will support their classroom practices.

Recommendation – Key Performance Indicators (KPIs)

KPI 1 – 90 per cent of eligible clients who complete an initial AMEP assessment or are referred to AMEP Distance Learning actually commence in the program within 6 months – should be modified to include an option for students to formally defer commencement.

The department should also consider development of a KPI to measure and encourage service provider recruitment activities.

KPI 2 – 80 per cent of clients in Pre-Employment and Social English Streams attain one ACSF indicator per 200 hours of tuition – should be amended in light of the proposed changes to student progress reporting (see Recommendation 15).

KPI 3 – 95 per cent of data is recorded and reported within the required timeframes – should be retained and applied only once a new information management system is implemented.

KPI 4 – 80 per cent of client assessment outcomes are accurate against the ACSF – should be discontinued in light of proposed changes to KPI 2.

To further ensure teaching quality in the AMEP, the department should consider working with the proposed AMEP Advisory Committee (see Recommendation 7) to develop continuous improvement strategies for service providers to implement.

CLIENT SUPPORT

8.1 Child care

8.1.1 Introduction

This section evaluates the effectiveness of child care provision for Adult Migrant English Program (AMEP) students. It considers child care provision both in terms of the new business model (NBM) and more broadly.

Free child care for AMEP students was made available in 1983 in 40 locations around Australia (Martin 1998, p.25). Free child care is not a legislated requirement, but AMEP providers have been required to offer free child care for the under school-aged children of AMEP students under previous and current contracts.

Under the previous contract, the child care fee was one tendered price. Under the NBM, child care fees have two components that are paid per child per hour of care during clients' actual attendance of an AMEP activity⁴² and up to half an hour travel time each way. The two components are:

- Child care provision – standardised base at the maximum hourly fee of \$11.55 (plus annual Wages Price Index (WPI) increases) for Long Day Care set out under the Jobs for Families Child Care Package which commenced in July 2018.
- Child care administration fee – tendered pricing, this fee is for the costs involved with sourcing, managing and maintaining child care placements for either offsite or onsite arrangements (DET 2016, p.37).

AMEP service providers can choose to arrange for child care by subcontracting to existing child care facilities, paying a child care provider chosen by the student, or by running their own onsite child care or creche.

Program data shows that the proportion of students using child care has not significantly changed under the NBM compared to previous years. In 2017-18, 11.5 per cent (5976 out of 51 800) students used child care. Ninety-three per cent of these students were female. Slightly more than half of child care users were family visa holders; the remaining half was equally divided between humanitarian and skilled visa holders.

8.1.2 The provision of child care is vital to AMEP student attendance

All stakeholder groups agree that the provision of free and accessible child care is fundamental to the AMEP. Without child care, many migrants, especially women, would not be able to attend classes or concentrate on learning. Across all focus groups, many students, particularly women, described child care as key factor determining their access to English tuition.

I am using child care before coming here, arranged by [service provider]. It is very helpful for my attendance and participation.

—AMEP student

Twelve AMEP service providers stated in interviews and submissions that free child care for AMEP is vital to supporting student access to the program. Five government agencies and nineteen community organisations also commented on the importance of child care. One service provider noted that child care also supports language acquisition in migrant children.

The provision of free child care services for under school-age children is a beneficial part of the AMEP. It encourages clients with children to improve their linguistic skills and indirectly assists young children to adapt to an English-speaking environment by having regular access to a child care facility at an early stage of their life.

—AMEP service provider

⁴² AMEP activities that allow for child care provision are classroom-based tuition or participation in a SLPET work experience activity. Distance Learning and the Volunteer Tutor Scheme do not allow for child care.

Figure 39: Teacher survey: impact of child care on increasing participation, student wellbeing and effectiveness of learning

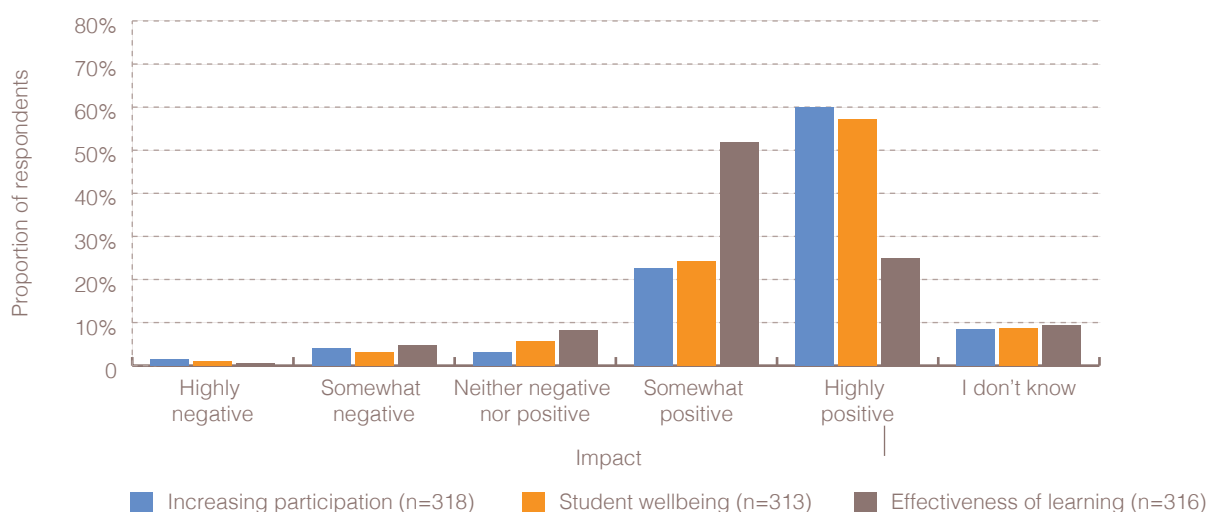


Figure 39 shows that more than 80 per cent of surveyed teachers consider child care to have a highly or somewhat positive effect on student wellbeing and increasing participation in the AMEP. Seventy-seven per cent indicated that child care has a positive impact on effectiveness of learning.

Key finding:

The provision of free child care is vital to many AMEP students' attendance and is a principal strength of the AMEP.

8.1.3 Funding for child care does not align with practices within the broader child care sector

Stakeholders agreed that child care provision is a strength of the AMEP and supports student attendance. It is, however, costly and complex to provide. The AMEP will spend around \$33 million on child care for the children of 6,000 students in 2018-19. Continued growth and market power of the child care sector, the introduction of the new Child Care Subsidy (CCS) scheme on 1 July 2018, and recent changes to AMEP child care funding have compromised the efficiency and viability of child care provision for many service providers.

The child care industry has grown exponentially since child care was first offered to AMEP students. Currently, industry revenue is \$13 billion (IBISWorld 2019), Commonwealth subsidies are valued at \$1.9 billion (Roberts 2019) and 1.3 million children attend various forms of child care (IBISWorld 2019).

Four AMEP service providers, one community organisation and one child care provider remarked that the rate paid to AMEP providers is insufficient to cover the full cost of child care. As an example, one service provider reported that the average price for child care across their state is \$14.71 per hour. They are obliged to cover the gap between the amount charged by child care facilities and the fee paid under the AMEP contract. A representative from a former AMEP service provider indicated that the insufficient funding for child care under the new contract had a significant impact on their decision to discontinue AMEP delivery.

The AMEP Request for Tender called for tenderers to propose child care administration fees to include the costs of: (i) sourcing, matching and confirming child care places; (ii) all fees and charges including absences, holiday and holding fees; and (iii) all other program administration costs (DET 2016, p.37). While some providers understood the complexities of child care funding, and charged an appropriate administration fee to cover the range of costs, it appears many did not.

In addition to the gap between funding and fees charged, the funding model of AMEP child care does not align with the way child care facilities charge for their services. Most mainstream child care services offer either a half-day or a full-day rate — they do not charge by the hour. However, child care in the AMEP is funded in terms of the hours that a student is participating in an AMEP activity. Two stakeholders pointed out that although the standard AMEP delivery model is four to five hours, child care providers apply a full-day fee. Service providers must bear the cost of the full-day fee, but are only paid for the hours that a student is in class. The evaluation Advisory Committee recommended that where children are in long day care, the department should transparently pay the full cost of that care, rather than expecting AMEP providers to bear the loss or subsume it within the child care administration fee.

Six service providers explained that although they are not paid for a student's absence, they still have to bear the cost of an arranged child care placement that is not being used.

AMEP Service Providers are not paid for student and child care non-attendances, including where students arrive late or leave early. However, once children are booked into a mainstream child care service, all booked care must be paid for, including when children or parents are absent and notice periods when students decide to withdraw.

—AMEP service provider

Unpredictable student absences create a financial burden even where service providers operate onsite creches. One such provider reported that there are instances where there are only two children in the creche and it operates at a loss.

Funding that ceases during non-teaching periods does not reflect the operational practices of the child care industry. AMEP classes only run during school terms, but mainstream child care does not arrange

the provision of their services, or fee schedules, around these terms. Child care places are generally booked and paid for on a regular, ongoing basis. One service provider reported that their child care provider had been willing to hold places for AMEP students over holidays without charging for those days but was not confident that this arrangement would be sustainable. Another provider indicated that they lose child care places over the long Christmas break because there is no funding to maintain these placements. A third provider has paid significant holding fees to retain placements over breaks.

To prevent providers under-tendering the costs of child care in the future, the evaluation Advisory Committee suggested that a realistic child care rate and child care administration fee should be set by the Government and not subject to competitive tender.

Two AMEP service providers, one child care provider and a community organisation reported that low availability of affordable child care in some locations, particularly regional areas, can delay student entry into the AMEP. The evaluation Advisory Committee noted the dramatic growth and changes in the wider child care industry in the last decade. The CCS increased affordability of child care and families consequently took up extra days of care for their children. Increased child care use accelerated in the second half of 2018 (IBISWorld 2019). The AMEP needs program arrangements that can operate effectively and responsively with changes as they occur in the sector.

Key finding:

AMEP funding for child care does not align with the operation of the broader child care industry. This misalignment results in a financial burden for service providers.

8.1.4 Managing child care in the AMEP is complex and administratively burdensome

Stakeholders are concerned that the current administrative practices involved in providing child care are onerous and impractical. Four service providers reported that managing child care provision in the AMEP is complex and creates a significant administrative burden. For example, providers have to collect information from child care providers to track child care attendance against a student's AMEP attendance. This problem could be reduced by the introduction of an appropriate AMEP information management system which would allow child care providers to directly report child care attendance.

AMEP providers also have to support their students through an often unfamiliar process of putting their children in day care, including provision of immunisation documentation. One provider noted that this process, in addition to negotiation with child care providers about pricing and hours, can delay the placement of students' children in child care and consequently the student's commencement in the AMEP.

The time taken to find affordable child care has also resulted in increased wait times for clients entering the AMEP. The average wait time for clients who were on a waiting list during 2018 was 42 days.

—AMEP service provider

Three providers indicated that more support from other agencies and government departments would improve the administration of child care in the AMEP. This suggestion emphasises the complexity of child care provision in the AMEP and the need for administrative structures to support service providers.

Key finding:

The requirement to provide child care is administratively complex and burdensome for AMEP service providers.

8.1.5 Different modes of child care provision have advantages and disadvantages

Some service providers deliver child care at onsite creches, while others contract to offsite child care providers. Offsite child care can be challenging when it is not located close to the AMEP service provider and complicates transport arrangements for the student. When offsite child care operation hours are not aligned with AMEP class times, students struggle to coordinate child care pick-up and drop-off times with class attendance.

Although provision of child care funding is a strength of the program [...] the 'buffer' times before and after classes are too short, causing anxiety for participants as they drop off and pick up their children.

—AMEP service provider

One service provider reported that the payment for a student's travel between child care and AMEP was not sufficient to cover the time it takes for some students who use public transport.

Community organisations and providers also noted that for certain migrant cohorts, especially those coming from areas of conflict and instability, leaving a child at formal child care was a new and potentially distressing experience both for parents and child.

Onsite creches alleviate some of problems associated with offsite child care, including transport difficulties and negotiation between providers. One child care provider stated that AMEP clients generally prefer the convenience of onsite child care. The Perth North case study illustrates some of the advantages and disadvantages of onsite creches. Focus groups in this region revealed that, in general, the option to have their child cared for onsite was welcomed by students, especially new parents who were reluctant to leave their child with strangers. Some parents felt more comfortable having child care provided in the same location as their AMEP classes.

It's a very good facility [...] I never put my daughter anywhere before but because it's next to us it's relaxed for me, I can feel good and I can actually concentrate.

—AMEP student

On the other hand, for those students with expectations of a mainstream child care arrangement, the onsite creche requires some adjustment. The Perth North case study shows that creches do not always provide services such as nappy changing, and students, usually mothers, are routinely called from their classes to attend to their child's needs in the creche. While some parents were comfortable with this arrangement, others found that it disrupted their learning. Some mothers reported spending long periods of time in the creche comforting a crying child when they could have been in class.

It seems like some of the mums find that if the kid cries they are called to come and look after their kid. This is not uncommon.

—Community organisation

This evaluation does not draw conclusions regarding the relative appropriateness of onsite and offsite child care. Service providers are currently granted the flexibility to arrange child care to best suit the particularities of their location.

8.1.6 Child care provision in AMEP only partly addresses equitable access for women

Child care provision for children too young to attend school only goes part of the way to ensuring equitable access for women to English language tuition. As many of the women in focus groups pointed out, responsibility for domestic duties is disproportionately placed on women.

We don't have time, we need to cook, clean. We don't have time to study, everyone comes home at a different time, we need to look after them. The kids don't help that much. Mum has to do everything.

—AMEP student

8.1.7 Summary: child care

Provision of child care in the AMEP is vital for ensuring access to the AMEP for migrant parents, especially women. However, the misalignment between current funding arrangements and the broader child care sector is resulting in financial losses and administrative burdens for service providers. Administrative problems are also exacerbated by the current information management system, which does not allow for ease of information sharing between AMEP and child care providers. Students in some locations are experiencing delays in accessing child care and therefore AMEP tuition because of the difficulties involved in sourcing and negotiating affordable child care.

The evaluation did not seek to draw conclusions about the best mode of child care provision in the AMEP. Discussions with student and stakeholders revealed that each has advantages and disadvantages and that some modes of delivery are more appropriate in certain contexts.

Women in the AMEP bear more of the child care burden than their male counterparts, and this can have a negative impact on their learning. While some of these systemic issues are not easily resolved, initiatives such as the Community Hubs may help to provide more equitable access for women. These Hubs are embedded in the community, usually in schools, and help connect migrants to community, schools and services.

Recommendation – Child care

The government should conduct a review of child care within the AMEP. The aims of the review should be to examine funding, administration arrangements and provision models to optimise quality child care access for students, and minimise administration burden and funding gaps for the provider.

8.2 Volunteer Tutor Scheme

The Volunteer Tutor Scheme (VTS) provides opportunities for volunteers to assist Adult Migrant English Program (AMEP) students, either through one-on-one tuition or as classroom assistants. Under previous contracts, this scheme was known as the Home Tutor Scheme (HTS). The HTS was introduced in 1974 to provide a more formal structure to the English tuition than was being provided by volunteers from church groups and community organisations (Martin 1998, p.104). Service providers were paid a one-off fee to match a student with a volunteer, as well as an hourly fee for a maximum of one hour a week per student. The Home Tutor Enhancement Program (which operated under previous contracts) provided training for non-AMEP volunteers from community centres and organisations to enable them to tutor migrants who were ineligible for the AMEP.

Under the new business model (NBM), the following changes were made to volunteer tutoring in the AMEP:

- The one-off fee for matching a student with a tutor has been removed. The payment for one hour of tuition per student per week has been retained.
- All students are now eligible for VTS, even if they are attending classroom-based AMEP tuition.⁴³
- Special Preparatory Program (SPP) students are eligible for a maximum of two hours of VTS per week.
- The Home Tutor Enhancement Program has been abolished and funds have been redirected to the Innovative Projects funding scheme.

Since the start of the new contract, the program's name has changed from Home Tutor Scheme to Volunteer Tutor Scheme. This change reflects the fact that volunteers can assist AMEP teachers in the classroom and/or conduct one-on-one tutoring outside of the student's home. The intention of this change was to attract more volunteers to the program.

VTS hours are deducted from a student's 510-hour entitlement.

8.2.1 Stakeholders consider the Volunteer Tutor Program to be a valuable element of the AMEP

Social Compass heard several stories attesting to the benefits derived by both students and tutors from their involvement in the scheme. One service provider staff member described the VTS as 'one of the shining stars' of the AMEP.

The scheme also allows some students who are unable to attend classes the opportunity to access language tuition. VTS is particularly helpful for women who cannot or prefer not to put their children in child care, or who have domestic responsibilities that limit class attendance. Additionally, it gives isolated students the chance to connect socially with someone who understands life in Australia and can support them in their settlement process. Such students might choose not to enrol in Distance Learning (DL) but want to engage in less formal English tuition.

We find that it's a fantastic scheme [...] we find that the VTS can assist in connecting clients to the wider community – and so we work very hard at training tutors to assist students.

—AMEP service provider

The VTS can also benefit students who do participate in DL, or who need some assistance to do so. As discussed in section 5.4.6, the proportion of DL students with tutors is currently low.

The wider scope of the VTS, which has taken the emphasis away from tutoring in the private home, has had positive outcomes for students.

The name change from Home Tutor Scheme to Volunteer Tutor Scheme has encouraged a wider range of tutor participation. Some clients and tutors did not feel comfortable meeting in the home. By now promoting the program as Volunteer Tutor Scheme, we have seen our tutor numbers increase. Opportunities for clients and tutors to explore tutor locations such as TAFE Libraries and public libraries has proven to be very positive. For some female clients, the weekly session with their tutor may be their only opportunity to leave their home and engage in the local community.

—AMEP service provider

⁴³ The exception is students enrolled in Settlement Language Pathways to Employment and Training (SLPET).

In interviews, three AMEP teachers gave positive reports regarding the assistance that volunteer tutors provided in their classes. One teacher commented that the two volunteers who help with her classes are of high calibre and interact well with students. Students in the Perth North case study noted that having a volunteer tutor in the class is beneficial as often the AMEP teacher does not have the opportunity to interact with all students on a one-to-one basis.

A contrary view was raised by two teachers who were concerned that volunteer tutors are being used in the AMEP to counteract the detrimental effects of having multiple levels of proficiency enrolled in one class. One teacher noted complaints that volunteer tutors are expected to teach one section of a multi-level class rather than assist the teacher with the class as a whole.

8.2.2 Availability of volunteers varies significantly across service providers

The number of volunteers available to tutor in the AMEP varies significantly between service providers. In Term 2, 2019, several small regional service providers had no volunteers. The largest volunteer pool, at a large metropolitan service provider, was 979, with 53 per cent actively tutoring AMEP students. A more typical pool size for large providers is between 250 and 350 volunteer tutors, with proportions of 45 to 75 per cent active. The smaller services ranged from zero to 150 volunteers.

The proportion of students who had a VTS tutor also varies significantly between service providers. At one smaller service provider, 88 per cent of students had a VTS tutor, but across the remaining service providers the proportion of students with a VTS tutor ranged from zero to 20 per cent.

There is also a large variation in the number of volunteer tutors that assist AMEP classes. Across five of the larger providers, the proportion of classes using volunteer tutors ranged from two to 65 per cent. Some smaller providers use volunteers in all their classes, and others do not use them at all.

Availability of volunteers is also variable. Two service providers reported that a high level of disadvantage in their local community made it difficult to source volunteers. Service providers in larger metropolitan areas face fewer challenges.

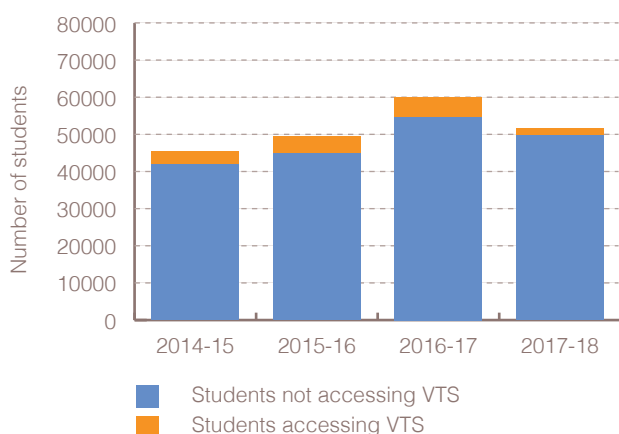
One service provider noted that service providers exiting the AMEP did not provide incoming providers with details of volunteers, leading to a loss of volunteers from the program. This issue was also noted by Proper Business in their 2018 Distance Learning review (p.14). The department has acknowledged the loss of volunteer tutors in contract transition. It is taking steps to require outgoing service providers to provide their volunteers with information on how to continue their involvement with AMEP under the incoming provider.

In some cases, service providers and community organisations are working together to source volunteers for the AMEP. Increased awareness of the VTS among community organisations and further efforts to coordinate the recruitment could help to bolster volunteer numbers.

8.2.3 The use of volunteer tutors has decreased under the NBM

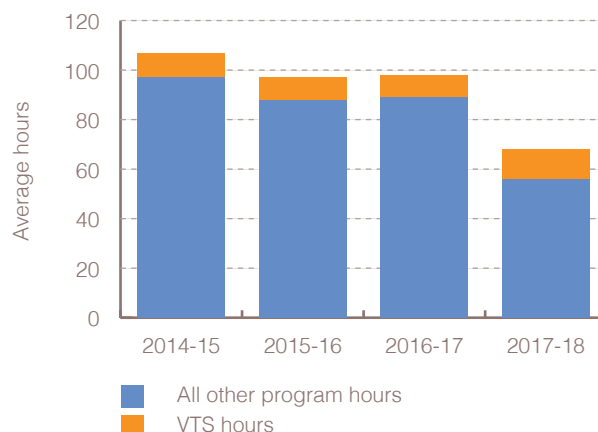
Program data analysis indicates a recent decrease in the use of volunteer tutors. The total numbers of active enrolments compared to those that also accessed VTS each financial year is shown in Figure 40. Even though the total numbers of active students each year changed under the previous contract, the proportion of students using the VTS remained constant at about nine per cent. However, this proportion has decreased to four per cent under the NBM. This decrease can be at least partially accounted for by the loss of tutor details (discussed above) that occurred in transitions between providers.

Figure 40: Proportion of active students accessing VTS



However, among students who are accessing VTS, there has been a slight increase in the proportion of their AMEP hours used through this scheme. Figure 41 shows that under the previous contract, students accessing VTS used nine per cent of their total AMEP hours through this scheme. This proportion increased to 18 per cent in 2017-18.

Figure 41: Students accessing VTS: proportion of AMEP hours used through VTS compared to other programs



Key Finding:

The VTS is highly valued by most service providers and stakeholders and the changes to delivery have had positive impacts. However, the availability and use of volunteer tutors varies significantly between service providers due to geographical, demographic and historical factors (e.g. previous providers not providing the contact details of their volunteers).

Recommendation – Volunteer Tutor Scheme

Stakeholders should consider ways to more systematically recruit and retain volunteers as part of the Volunteer Tutor Scheme.

Recruitment strategies could include stronger partnerships with the Humanitarian Settlement Program and relevant community organisations to recruit volunteers. A new AMEP information management system should be used to record volunteer tutors' details (see the Information Management System Recommendation).

PROGRAM STRUCTURE AND INNOVATION

9.1 Multi-provider model

9.1.1 Background to the multi-provider model

Introduction

In its 2015 evaluation of the Adult Migrant English Program (AMEP), ACIL Allen (2015a) made recommendations that drew upon findings from its parallel evaluation of the Skills for Education and Employment (SEE) program (ACIL Allen 2015b). The SEE evaluation reported that the multi-provider model (MPM)—where a contract region has more than one service provider—had enhanced the SEE program's overall capacity and coverage, and allowed for improved performance management of service providers and continuity of delivery. The evaluator noted, however, that improvements in training quality or responsiveness to client needs were less evident.

These findings, and the assumed benefits of market competition, led to the recommendation made by ACIL Allen that the AMEP *consider* introducing a multi-provider model, on the basis that the benefits the MPM afforded to the SEE program would also apply to the AMEP program. These benefits include:

- improved marketing and engagement with prospective eligible migrants
- increased partnerships that better enable providers to meet client needs
- improved regional access and delivery
- specialist providers and models that cater to specific client cohorts
- unpredictable client-focused innovation
- reduced contract management requirements and contractual specificity (thereby increasing flexibility).

As part of the new business model (NBM), the government selected the Sydney South West contract region to trial the MPM. The two contracted providers are Navitas (Provider 1), the incumbent provider for the region, and TAFE NSW (Provider 2), which has experience providing the AMEP in other contract regions.

The objectives of the evaluation of the MPM were:

- to analyse the effect of increased competition on service delivery and client outcomes
- to determine the viability, risks and benefits of expanding the MPM into other contract regions in future AMEP contracts.

9.1.2 Evaluation method

Major and complex changes to a program are ideally preceded by the identification of indicators that will allow stakeholders and evaluators to measure the success of the changes. When the department introduced the MPM to the AMEP, however, it did not specify measures of success for the model. In the absence of specific, pre-determined indicators of success, this evaluation uses data describing student participation, progress and experiences to assess the effects of the MPM. Two broad comparisons provide insight into the potential impact of the model:

1. comparison of Sydney South West before and after the introduction of multiple providers
2. comparison of Sydney South West with two counterfactual⁴⁴ regions in Victoria, Melbourne West and Melbourne North West.

Focus groups with students provided qualitative data about student outcomes in each of the three regions.

⁴⁴ 'Counterfactual regions' refer to contract regions where the intervention (i.e. the introduction of a multi-provider model) has not taken place. The use of a counterfactual is an evaluation technique in which the observed results of an intervention are compared with circumstances that one would expect if the intervention had not occurred.

The two main quantitative metrics used to investigate changes in these regions were:

- student participation in classes, including AMEP subprograms
- student progress in learning English.

Two comparison cohorts were identified within the Sydney South West region and quantitative data from each was compared with a similar cohort from one of the counterfactual regions.

The two comparison cohorts were:

- Female Vietnamese partner visa holders (mostly high school to tertiary educated)
- Iraqi humanitarian visa holders (range of literacy levels): This large group of refugees is largely made up of the additional intake of 12 000 humanitarian entrants announced in December 2015 and makes up 10 per cent of the total AMEP population nationally. Unlike many other refugee groups, it includes a significant number of highly educated individuals, although patterns of education varied across the regions.

For the Iraqi humanitarian cohort, the Sydney South West region was compared with Melbourne North West. For the Vietnamese partner visa holder cohort, the Sydney South West region was compared with Melbourne West.

9.1.3 There is no evidence that the multi-provider model influences participation in the AMEP

Since the introduction of the NBM and the MPM, the number of students for the comparison cohorts have increased for some providers and decreased for others. Figure 42 shows that:

- The number of Iraqi students commencing in the AMEP decreased in all three regions under the new contract, while the number of active students increased.⁴⁵ This reflects the timing of the arrival of the aforementioned cohort of 12 000 humanitarian entrants and when they have accessed the AMEP.
- The number of female Vietnamese partner visa holders increased in the MPM region, both in terms of commencements and active students. In the counterfactual region, however, these numbers decreased.

Participation is an indicator that may reflect the impact of competition. However, in the absence of data that indicates how many eligible clients choose not to take up AMEP tuition, it is impossible to ascertain what proportion of students from a given cohort are enrolling in the AMEP. Increased enrolment at one

Figure 42: Comparison cohorts: numbers of commencements and active students



⁴⁵ As explained in Section 2.1.1 commencements are students that enrol in AMEP in a given time period while active students are those participating in an AMEP activity during a given time period.

provider by a certain cohort does not necessarily indicate increased performance by this provider. Other variables, such as fluctuating migration patterns and intake, may account for increased demand in some areas. While the data on eligible clients was not available for this evaluation, section 7 includes a recommendation to develop a key performance indicator (KPI) to measure and encourage service provider recruitment activities. This potential KPI would require an estimation of the proportion of migrants eligible to participate in the AMEP. The development of an 'eligibility denominator' would increase the effectiveness of using commencements and activity as indicators of success in future evaluations of the MPM. As shown in the following analysis, there are some significant variations in participation between regions.

Figure 43 shows that the number of Iraqi students active in the 510-hour AMEP increased by 849 for Provider 1 and 403 for Provider 2 after the transition to the new contract. A high number of Iraqi commencements coincided with the increased intake of humanitarian migrants which was announced in 2015 and arrived in subsequent years. It is probable that the increase in active students in 2017-18 represents increased engagement in the AMEP by this cohort as they settled into their new lives. There is no evidence that this increase was due to market competition encouraging recruitment. Of note is the greater share of commencements secured by Provider 1 in the MPM region. This provider has rented classroom space close to public transport in the suburbs where these students reside, possibly facilitating their engagement. If so, this is an example of provider responsiveness increasing student engagement with the AMEP. Provider responsiveness and performance is not, however, necessarily evidence of market competition driving performance. There is no evidence that the existence of a second provider influenced the behaviour of Provider 1 as this model was part of Provider 1's operation in the previous contract.

There is also a modest increase in the number of tuition hours students are accessing under the NBM: between 20-30 hours in the multi-provider region. However, there is a similar increase in hours in the counterfactual region, suggesting that this increase in participation is not attributable to the MPM.

As with the Iraqi cohort, there is a similar limitation to identifying underlying reasons for change in levels of participation in the Vietnamese comparison cohort. Instead of an increase, however, there is a significant decrease in the counterfactual region under the new contract. Without data describing the number of eligible clients in this area, it is not possible to tell whether this decrease is due to dissatisfaction with the provider, confusion created by a change of provider, or a shrinking population of Vietnamese migrants entitled to access the AMEP in this area.

In contrast, Vietnamese commencements in the AMEP in the multi-provider region increased significantly. Again, in the absence of numbers of eligible migrants, it is not clear if this is due to migration patterns, improved recruitment promoted by competition, or some other factor.

Within the multi-provider region there is evidence that the two providers attract slightly different demographics; NSW TAFE students are on average a younger and more highly educated cohort. It is possible that the status of TAFE in the community as a vocational training institute appeals to a younger cohort who might want to continue with vocational training in the future. Availability of choice in this instance might have enabled those from different demographics to choose a different provider to suit their needs.

Availability of choice does not, however, require two separately contracted providers. One of the counterfactual regions has a subcontracting model which provides choice by combining Learn Local sites and TAFEs. The providers report that students who have clear pathway goals, higher levels of prior education and transport options often select the TAFE as their preferred provider, while older and lower-level students and parents often commence with community providers at sites close to their home.

Figure 43: Comparison cohort participation in AMEP and its subprograms

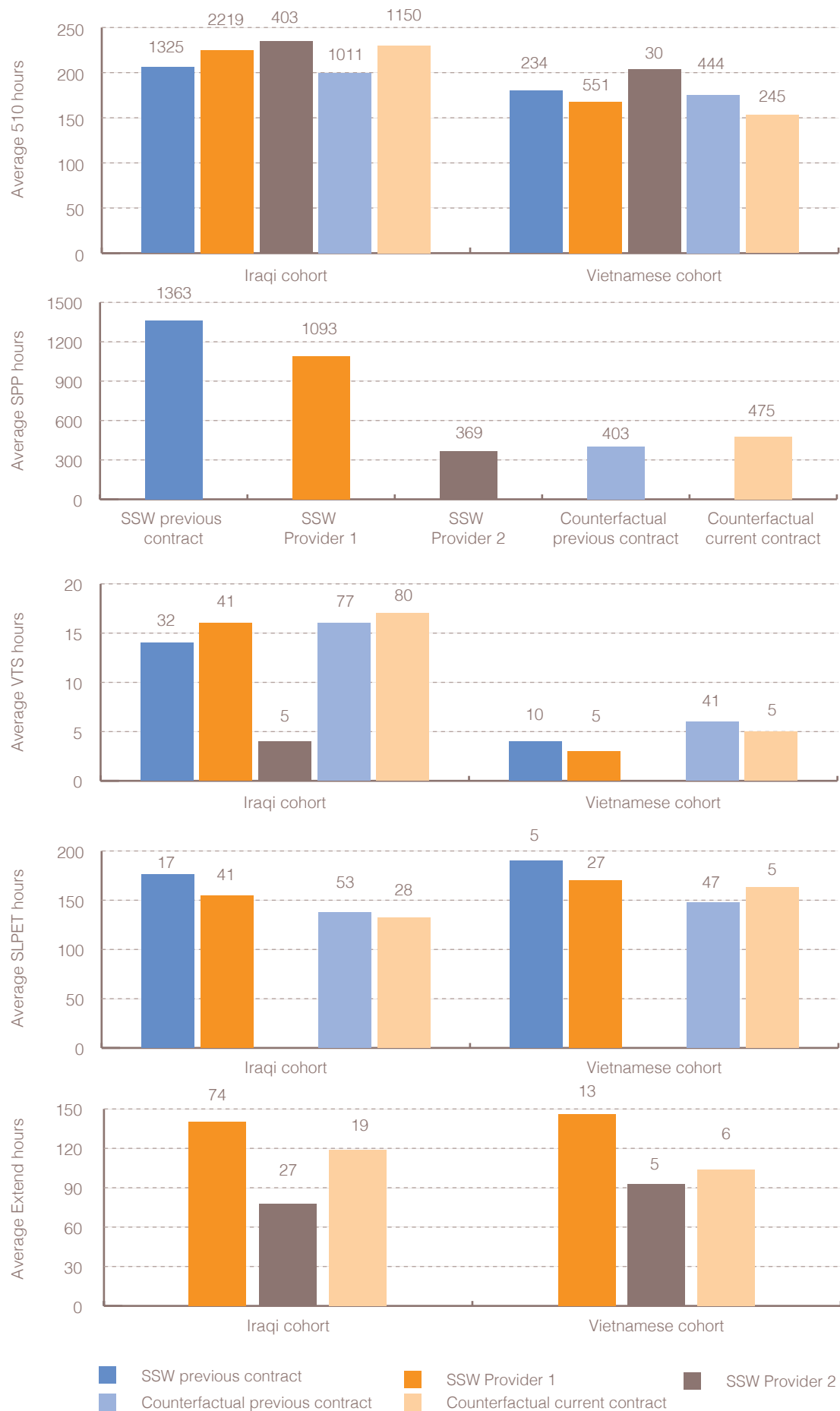


Figure 43 also illustrates modest variations in the usage of AMEP subprograms between contract regions, and within regions from the previous contract to the NBM. No pattern emerges showing consistently higher AMEP usage in the multi-provider region that suggests any benefits attributable to competition.

Student engagement in Settlement Language Pathways to Employment and Training (SLPET) has increased in Sydney South West and decreased in the counterfactual region for both cohorts under the NBM. This increased participation in the multi-provider region is more likely explained by an overall increase in student numbers for these cohorts rather than by the existence of multiple providers. Similarly, the decline in SLPET under the NBM in the counterfactual region is more effectively explained by the time needed by the two new providers to establish relationships with employers and/or the reduced attractiveness of providing SLPET due to the changes to the funding model (see section 9.4).

In summary, there is no convincing evidence that the MPM is driving greater AMEP participation.

9.1.4 There is no evidence that the multi-provider model influences student progress in the AMEP

It is difficult to compare student progress under the current and previous contracts, as the reporting process has changed. Student initial assessment data for the previous contract was based on the International Second Language Proficiency Ratings (ISLPR). To monitor student progress, service providers reported completed modules and competencies attained in the Certificates in Spoken

and Written English (CSWE) curriculum (2013 edition). For the following analysis, student progress has been calculated using the number of CSWE competencies attained.

Under the NBM, student initial and progress assessments are reported using the Australian Core Skills Framework (ACSF). Student progress in the AMEP is described using eight indicators: two each for the skills of reading, writing, learning and oral communication. For each indicator, a student can progress zero to five levels: from Pre Level 1 A and B through Levels 1 to 3. In the following analysis, student progress is calculated by adding the number of levels a student has advanced across all indicators on which they have been assessed during their time in the AMEP. A student who has progressed by two levels may have advanced by one level in two indicators, or they may have advanced by two levels on one indicator.

It is important to note that students are not routinely assessed against all indicators, as service providers only have to report student progress against one ACSF indicator every 200 hours. This reporting system therefore does not provide a comprehensive picture of student progress. As such, comparisons between service providers and/or regions using this method should be approached with caution.

Iraqi comparison cohort

Under both the previous and current contracts, more progress was shown by Iraqi students in the counterfactual region than by those in the MPM region. Figure 44 shows that under the previous contract, proportionately more students in the counterfactual region progressed by eight or more CSWE competencies.

Figure 44: Iraqi comparison cohort: CSWE competencies attained in the previous contract

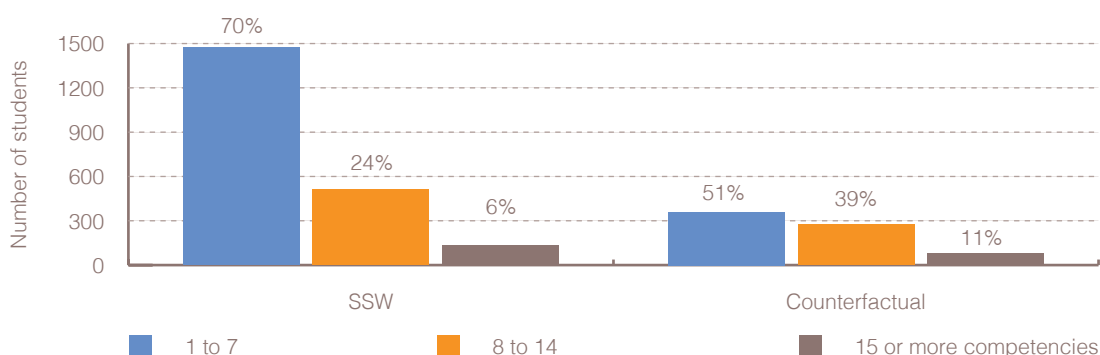
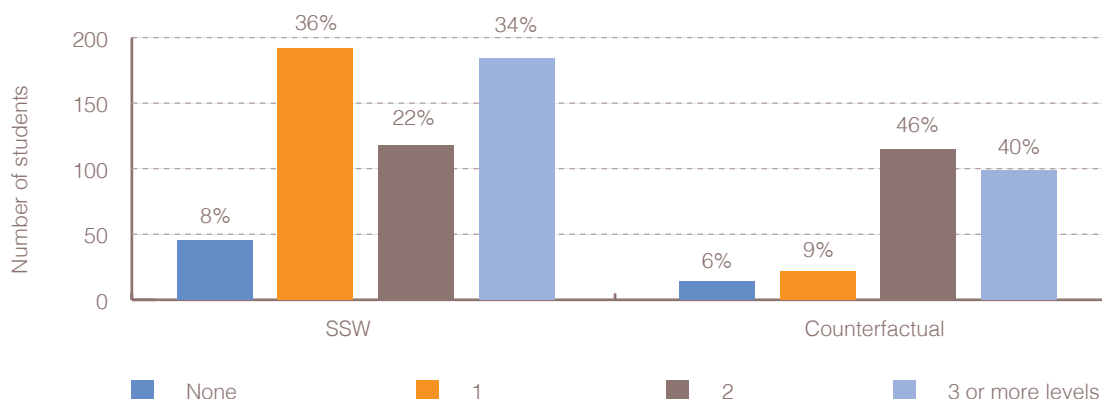


Figure 45: ACSF levels advanced by Iraqi comparison cohort in Sydney South West and counterfactual regions



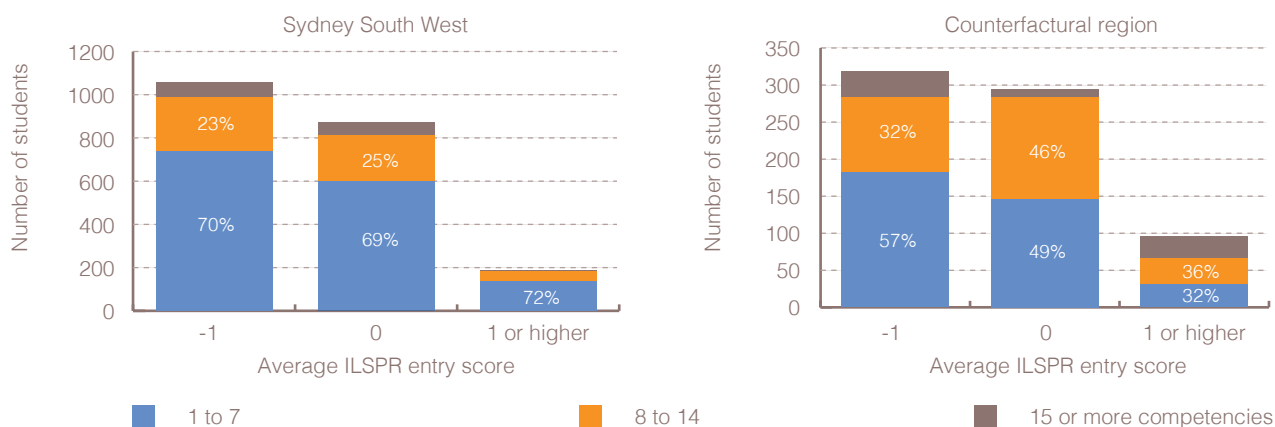
Similarly, under the NBM, Figure 45 shows that students in the counterfactual region advanced more ACSF levels on average than those in the multi-provider region.

The introduction of the MPM has not, therefore, resulted in improved progress for this cohort. There are many reasons why this cohort might be progressing more slowly in Sydney South West. It is worth noting that under both the old and new contracts, the counterfactual region had a higher proportion of students who had only received primary school education. Lesser access to prior education therefore cannot explain a slower rate of progress in Sydney South West.

Another factor influencing rates of progress could be a student's level of English proficiency at the time of enrolment. If one region had a substantially greater

proportion of more advanced students, for example, this might explain a different average progress rate. This possibility is explored by classifying students in terms of their initial ISLPR score and investigating the progress rates for each group.⁴⁶ Figure 46 shows that, under the previous contract, the counterfactual region had a slightly higher proportion of students with higher levels of English. These higher-level students progressed at a faster rate. However, in Sydney South West there was no correlation between initial proficiency level and rates of progress under the previous contract. Therefore, the slower average rate of progress by students in Sydney South West cannot be explained by a higher proportion of students with lower proficiency levels.

Figure 46: Iraqi comparison cohort: CSWE competencies attained in the previous contract, disaggregated by entry ISLPR



⁴⁶ The comprehensiveness of the curriculum progress data collected under the previous contract makes this comparison possible. Concerns as to the accuracy of the ACSF reporting under the NBM introduce possible confounders so we limit this analysis to the previous contract.

Another possible factor affecting rates of progress is classroom and community environments. The concentration of Syrian and Iraqi immigrants is greater in the MPM region than in the counterfactual region. It is likely that this cohort is surrounded by others, both in AMEP classes and in the community, who speak the same language. Less exposure to English, and less incentive to use English in class to communicate with fellow students, could contribute to lower rates of progress. Students in focus groups reported that when AMEP classes were relatively homogenous in terms of student background, class members tended to communicate in their common language.

We all speak Arabic – so our conversation in English was very rare – and that was our barrier, to be able to learn and to develop.

—AMEP Student

In their longitudinal study of AMEP students, Yates et al. (2015, p.97) noted that participants expressed concerns about ‘the predominance of speakers from the same language background(s) in a class’. The tendency of peers to communicate in their shared first language was seen to limit the benefits of speaking practice. However, in the case of monolingual

classes, bilingual tuition —where the English teacher is proficient in the language spoken by the students— can be beneficial (Ma 2009; Yates et al. 2015). Rates of progress shown by the Iraqi comparison cohort could be influenced by class composition and extent of access to bilingual support. There is no evidence that the MPM has influenced the slower rates of progress for the Iraqi cohort in Sydney South West.

Vietnamese comparison cohort

Under both the previous and current contracts, the Vietnamese comparison cohort made more progress in the Sydney South West region than in the counterfactual region.

Figure 47 shows greater progress in Sydney South West under the previous contract in terms of CSWE competencies attained.

Figure 48 shows that after the introduction of the MPM, the Vietnamese comparison cohort continued to show more progress in the Sydney South West region.

As with the Iraqi cohort, there is no evidence that education levels influenced the different rates of progress for the Vietnamese cohort. Under both contracts, education levels were roughly the same

Figure 47: Competencies attained by Vietnamese students in Sydney South West and counterfactual regions

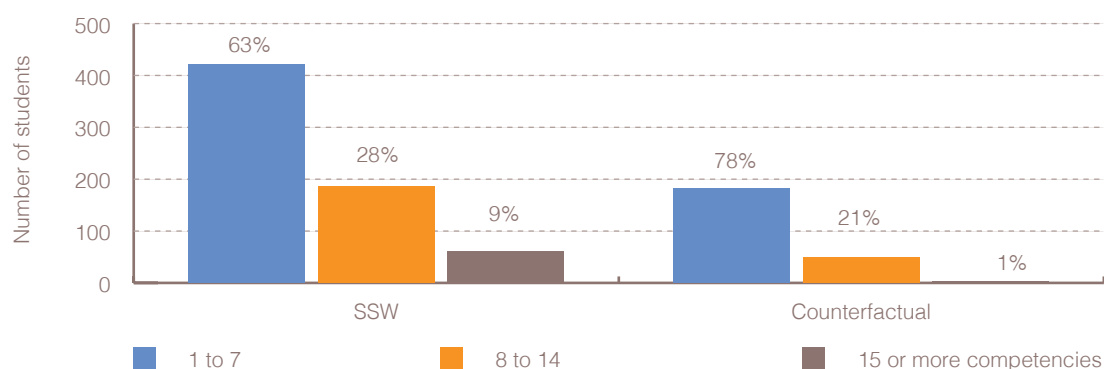
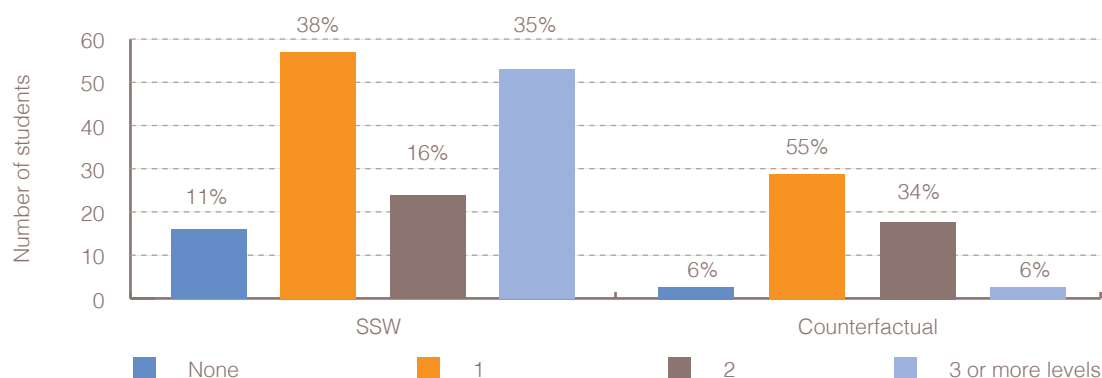


Figure 48: ASCF levels advanced by Vietnamese cohort in Sydney South West and counterfactual regions



across the two regions. The main change under the new contract was a decrease in the number of students with low education levels (primary or less) in the counterfactual region. Despite this slight trend towards higher education levels in the counterfactual region, this cohort made less progress than their Sydney South West counterparts under the NBM.

There is also no evidence that initial English proficiency influenced the different rates of progress for the Vietnamese cohort. Figure 49 shows that Sydney South West had a higher proportion of lower level students than the counterfactual region, but there was no correlation between ISLPR score and rate of progress. In the counterfactual region, students with a lower initial proficiency were slightly more likely to make more progress. Therefore, the higher rates of progress in Sydney South West cannot be explained by the presence of a group that is more likely to make more progress because of their initial English proficiency.

Although the Vietnamese comparison cohort has made more progress in Sydney South West than in the counterfactual region since the introduction of the MPM, this is consistent with the situation before the MPM was introduced. Increased rates of progress cannot, therefore, be attributed to increased provider choice.

9.1.5 Student experiences of the AMEP are consistent across the comparison regions

The evaluation also explored differences and similarities in the following data collected at focus groups:

- the most significant change that students identified as a result of their participation in AMEP
- challenges to student learning
- factors supporting student learning.

The evaluators also sought student recommendations for improving the AMEP.

The objective of focus group data analysis was to ascertain whether students in the MPM region experience differences in service delivery that can be attributed to the existence of two providers.

Social Compass conducted 17 focus groups in total across the MPM and counterfactual regions: six in Sydney South West (154 students), six in Melbourne West (66 students) and five in Melbourne North West (55 students). Two of the Sydney South West focus groups consisted of participants from existing community groups which meet regularly. The high attendance at these groups explains the overall higher numbers for the Sydney South West focus

Figure 49: Vietnamese comparison cohort: CSWE competencies attained in the previous contract, disaggregated by entry ISLPR



groups. The two comparison cohorts outlined above were strongly represented in focus groups, but students of many other nationalities were also present.

Across all 17 focus groups, students reported positive outcomes from their participation in the AMEP. They all identified improvements in their English as the most significant change resulting from attendance. They often linked progress in learning English to increased self-confidence.

While all the students could identify positive changes to their lives because of their participation in AMEP classes, they also described challenges that they have faced. These challenges are not specific to the MPM region. Complex needs and competing priorities of AMEP students were identified in all the focus groups.

Focus groups perspectives on factors that support learning aligned across the three contract regions. Students identified teacher capacity and availability as the most important factor. This was followed by the quality of the classroom environment (class size and consistency of student proficiency levels), and access to child care.

The challenges to learning and suggested improvements were generally consistent across the three contract regions. There is no conclusive evidence from the focus groups that the students in the MPM region faced specific challenges or were being offered significantly different learning opportunities. Their suggestions for improvement to the AMEP were also very similar.

Key Finding:

Neither the quantitative nor qualitative data from the evaluation provides evidence of better student participation or learning progress that can be attributed to having competing providers.

9.1.6 Migrants often do not have the capacity to make informed decisions about their AMEP provider

One rationale underpinning the MPM is that it provides an opportunity for students to choose which service provider they use for their AMEP tuition. Some community organisations from outside the MPM region hypothesised about potential benefits of increased choice for students, including more convenient class locations, more convivial, community-based classes, and more diverse delivery options. One community organisation with experience of the MPM reported that it was beneficial for the AMEP that 'the players know that clients have a choice and can change if they are not happy.'

However, despite some optimism regarding the potential of the MPM to provide more choice to students, there is little evidence that this is occurring.

Lack of choice and unclear referral pathways

AMEP students are relatively new to Australia. Many have no or very low English language proficiency and poor knowledge of local systems. The Australian Council of TESOL⁴⁷ Associations (ACTA), five service providers and one government stakeholder argued that many migrants lack the capacity to make an informed choice about their AMEP service provider. These stakeholders stated that, as potential AMEP students were generally unable to independently make an informed choice, they were commonly guided by others, particularly Humanitarian Settlement Program (HSP) and jobactive providers. They expressed concerns about the capacity of referring agencies to assist migrants to choose the best provider.

Focus groups with students in the MPM region revealed that they had not necessarily been informed about the choice of providers that was available to them. Students from only two of the six focus groups in Sydney South West were aware that there were

⁴⁷ Teaching English to Speakers of Other Languages

two AMEP providers in their region. The following exchange with an AMEP student illustrates the confusion surrounding choice of service provider.

AMEP student: As far as I'm concerned, I think there's no choice in that – it's compulsory to go to [name of service provider]. When you arrive in the country, you have your interviews and you have to go to [name of service provider] – there's no choice in that.

Consultant: Did you have a choice between classes at [name of service provider] or at [name of service provider]?

AMEP student: No... Everyone that comes here they move them to [name of service provider]. Just by chance I found about [name of service provider] – and can have 500 hours over there.

—AMEP student

This evidence of low student capacity to make informed choices accords with the ACIL Allen (2015b) finding that there was little evidence that multiple providers in the SEE program had improved training quality or responsiveness to student needs. ACIL Allen attributed this lack of improvement to the fact that clients were not sufficiently informed about the choices available to them. The absence of informed consumers weakens provider incentive to be responsive to client needs.

Other stakeholder comments revealed lack of knowledge or potential confusion related to the MPM. One community organisation that provides support to migrants in the MPM revealed they were not aware that there were two providers in the region. Another community organisation indicated that communication with potential students is made more difficult by the MPM. One AMEP provider from outside the current MPM trial region who was previously involved in the multi-provider SEE program reported confusion experienced by students, referring agencies and service providers in that program:

We have experienced a multi-provider model in the previous SEE contract and it was a very negative and confusing experience for clients, referring agencies and providers. We believe the AMEP should remain as one provider per contract region and not move towards multi-provider provision.

—AMEP service provider

Misconceptions about the differences between providers

Focus groups with students in the MPM region revealed some misconceptions about the differences between the two providers. Students believed that one provider offered more social or conversational classes while the other was better for students who wanted to go on to further study. The two service providers also reported that students and referring agencies held misconceptions about the focus of classes at each provider. One commented that HSP providers had misguidedly referred younger students to one service provider and older students to the other, without any evidence that the service providers catered better to different age groups. Focus groups also revealed a misunderstanding among students that English classes at one of the service providers were not free of charge.

Key Finding:

In the MPM region there is evidence of a lack of awareness in the community, and among HSP and jobactive providers, that both TAFE NSW and Navitas are AMEP providers. This lack of awareness may compromise the referral process.

9.1.7 Stakeholders believe that the inherent competition of the multi-provider model is not effective or appropriate for the AMEP

Several service providers from various contract regions noted that long-term AMEP providers have existing facilities, experience, administrative structures and community networks that new providers cannot necessarily offer. This uneven infrastructure means that it is difficult for a new provider to effectively compete for students from an incumbent provider, unless they are offering a unique, tailored tuition option. This is not necessarily the case in the current MPM region—where the incoming provider has existing facilities by virtue of being a TAFE—but it could be a problem if the model is rolled out elsewhere.

Disruption to learning

One of the service providers in the Sydney South West region noted that, because the two providers are in competition for clients, both providers will accept new students switching from the other provider at any time during the program. As a result, some students switch back and forth between providers during the term, which is disruptive to their learning and administratively burdensome for both AMEP and child care providers.

Facilitating credit transfers so that the providers recognise units covered at the initial provider is challenging, as is tracking student progress when they transfer between providers. Both providers in Sydney South West use the CSWE curriculum, but this disruption would be even greater if the two competing providers were using different curricula.

The emphasis on competition is not appropriate to the aims of AMEP

During the evaluation process, Social Compass heard from service providers, teachers and students about the high level of commitment and passion that the AMEP teachers have for the wellbeing and learning goals of their students. This appears to be a significant factor driving the quality of teaching in the AMEP. Competition might, as suggested by ACIL Allen's evaluation, motivate service providers to improve performance, but it also results in a decline in collaboration, communication and sharing of best practice and resources between institutions and

professionals. This decline could undermine the quality of student outcomes.

In both Melbourne counterfactual regions the AMEP is provided under a subcontracting model, in which the contracted provider works with several subcontracted providers. In effect, multiple providers deliver AMEP in the same region, but not in a competitive environment. As such, providers can refer students to other providers within the contract region who might meet their needs more effectively. The two contracted providers in these regions agreed that having multiple providers in direct competition would lead to negative outcomes for students.

Currently, we offer quality, consistency and choice to all clients as our network of subcontractors work together to support clients and provide as many opportunities as possible – the sharing of resources, partnerships, information and timetable/class options is made easy for the client as all providers work cohesively – this would not necessarily be the case should a multi-provider model be introduced.

—AMEP service provider

Key Finding:

There is a lack of stakeholder support for the extension of the multi-provider model.

Recommendation 11 – Multi-provider model

Given insufficient evidence for the benefits of the multi-provider model (MPM), the department should not expand the MPM in its current form to other metropolitan contract regions at this stage. Any future trial of the MPM should be preceded by:

- *development of clear objectives*
 - *development of clear data collection methodologies for measuring improved participation and educational outcomes*
 - *analysis of alternative methods that may better achieve the stated objectives (e.g. subcontracting arrangements through a single provider).*
-

9.2 Alignment of Adult Migrant English Program and Skills for Education and Employment program

9.2.1 Introduction

This section explores the success or otherwise of the alignment between the Adult Migrant English Program (AMEP) and the Skills for Education and Employment (SEE) program. It focuses on the use of the Australian Core Skills Framework (ACSF) as a common reporting framework for English proficiency. The evaluation was also asked to consider the combined procurement process for AMEP and SEE, as well as the introduction of similar administrative arrangements for the two programs. In response to consistent feedback from stakeholders, this section also makes a broader recommendation about the alignment of the AMEP to other government programs.

The SEE program provides up to 650 hours of accredited language, literacy and numeracy (LLN) training to jobseekers over a two-year period to help them participate in further training and/or the workforce. The SEE program, (formerly known as the Language, Literacy and Numeracy Program (LLNP)), commenced in 2002 when the Literacy and Numeracy Training Program and the Advanced English for Migrants program amalgamated to provide a more integrated management approach to addressing LLN needs among job seekers at a national level.

The SEE program differs from AMEP in several ways:

- The program only caters for job seekers who are experiencing significant disadvantage in the labour market due to low levels of LLN. Groups include: Aboriginal and Torres Strait Islanders (9 per cent), youth (15 per cent), mature age (49 per cent), people with disabilities, and job seekers from culturally and linguistically diverse (CALD) backgrounds (73 per cent).⁴⁸
- Participation requires a referral from the Department of Human Services or providers of jobactive, Transition to Work, ParentsNext, Community Development Program or the Disability Employment Services program.

- SEE offers a greater range of accredited curricula or training packages to SEE participants, focusing not just on language but also development of literacy and numeracy skills.

Upon entering SEE, clients are given an initial assessment using the ACSF. Depending on their results, they are then offered one of three streams:

- The Initial Language stream is for students whose first language is not English and who achieve Level 1 or below on the ACSF reading and oral communication indicators.
- The Basic Language, Literacy and Numeracy stream is for students who have ACSF scores around Level 2. It focuses on consolidating both language and literacy/numeracy skills.
- The Advanced Language, Literacy and Numeracy stream is for students who have higher ACSF scores, around Levels 3 to 5, in reading, writing and oral communication.

In 2015, ACIL Allen found that, although AMEP and SEE had different objectives and target groups, both are valued programs and each has the potential to benefit from the experiences of the other, including through shared treatment and/or systems. It found that certain levels of overlap between the services, particularly in terms of the needs of CALD clients, merited a greater degree of alignment between the two services.

ACIL Allen (2015b) recommended that:

- the proficiency gap be addressed for those who exit the AMEP with very low levels of LLN and would benefit from the SEE program but who might not be able to demonstrate continuous improvement at the rate required of SEE students
- formal pathways between AMEP and SEE be established, without limiting students' choice of program that best suits their needs
- more providers be encouraged to deliver both AMEP and SEE
- curricula be mapped to the ACSF, to facilitate pathways between AMEP and other training programs and the tertiary sector more broadly
- AMEP and SEE program monitoring, reporting and performance management systems be streamlined.

⁴⁸ SEE program data for the financial year to May 2019

A significant outcome of ACIL Allen's recommendations was the implementation of the ACSF to report student competency in AMEP. ACIL Allen recommended considering the ACSF for this purpose 'as it would most likely provide the greatest continuity and coverage from a national perspective.' The report also suggested that 'a possible alternative to achieve greater integration and continuity between the AMEP and other longer-term benchmarks is to undertake a formal mapping of benchmarks across relevant instruments' (ACIL Allen 2015b, p.xi).

This section examines AMEP stakeholder perspectives on the alignment of the AMEP and SEE. The use of shared administrative arrangements is not discussed as the introduction of a common information management system has been delayed (see section 7.1).⁴⁹

9.2.2 Stakeholders have differing views on the alignment of AMEP and SEE

Benefits of using the ACSF in the alignment of AMEP and SEE

Two service providers told Social Compass that they saw some benefit in using the ACSF to align AMEP with SEE.

The adoption of the ACSF in the AMEP has provided greater alignment between the programs. This is an advantage to clients transitioning from the AMEP to SEE as their levels are immediately understood by teachers and program coordinators.

—AMEP service provider

The department also reported benefits of aligning reporting processes for the AMEP and SEE programs.

These benefits, however, were not identified by other service providers who were more concerned about the problems arising from the implementation of the ACSF as discussed in sections 6.3 and 7.1. Implementation of recommendations to address these concerns may lead to improved service provider recognition of the benefits of alignment through ACSF reporting.

Different goals, different students

A key issue affecting the alignment of AMEP and SEE is the fact that the settlement focus of AMEP is broader than the specific workforce goals of SEE. While large numbers of AMEP students prioritise seeking employment, their broader settlement needs—necessary to support successful employment—may not be met by SEE.

Some stakeholders expressed concern that the attempt to align AMEP and SEE, while understandable from an administrative perspective, does not sufficiently account for the pedagogical differences between language and literacy learning. Service providers pointed out the discrepancy in the aims of the two programs and therefore questioned the rationale behind the attempt to align them.

The length of time clients have been in Australia is a key difference. The AMEP is meant to be a settlement program which fosters social and cultural integration as well as language learning, educational and employment outcomes. The SEE program, on the other hand, is a jobseeker program to which clients are referred and in which attendance is compulsory.

—AMEP service provider

Several service providers also pointed out that the percentage of AMEP students who are ready or eligible for the SEE program is very low.

The Centre for Multicultural Youth (CMY) described the attempt to align AMEP and SEE as further evidence of the shift in AMEP from settlement goals to workforce participation.

In this regard, the program alignment appears to reflect a broader shift of AMEP away from its focus on integrating English language learning with migrant settlement, towards the much more focused area of employment skills and economic participation. While it remains to be seen whether AMEP and its providers can achieve these dual goals CMY would reiterate that successful settlement, described as active citizenship by MYAN [Multicultural Youth Advocacy Network] Australia in its National Youth Settlement Framework, involves more than economic participation alone and it would be unsatisfactory for AMEP to lose this.

—Centre for Multicultural Youth submission

⁴⁹ SEE has been able to make some internal improvements such as introducing the unique student identifier (USI) into its system to undertake longitudinal analysis of client outcomes.

One service provider noted that the alignment of the two programs has made it easier to combine AMEP and SEE classes in some areas where they would otherwise not have enough students to run the classes separately. Other service providers, however, pointed out that SEE and AMEP students have very different needs. The Australian Council of TESOL⁵⁰ Associations (ACTA) strongly asserts that attempts to combine the goals of the two programs is detrimental to both.

Both Programs are now afflicted with confused goals, overlapping provision, a failure to understand and meet client needs, and complex client eligibility requirements that block some learners' pathways.

—ACTA submission

In contrast to this view, a business manager in one of the case study sites related how they effectively transitioned many of their AMEP students to SEE, including those enrolled in the Social Stream. The new SEE students often continue in the same class as they were previously. In the case where Indigenous and other SEE students were in the same class as former or current AMEP students the inclusive community dynamics made this a positive experience for all involved.

Funding

Two service providers also indicated that the SEE program, due to funding cuts, was not able to cater for the number of migrants who are eligible for the program after completing their AMEP hours. These service providers suggested that alignment between the two programs would be facilitated by increased funding for the SEE program.

Duplicate assessments

Several service providers and teachers reported that students who take an AMEP exit assessment measured against the ACSF are still required to sit another ACSF assessment before commencing SEE.

Clients who exit the AMEP and are referred to the SEE program are still required to go through a full pre-training assessment (PTA) against the ACSF. The ACSF indicators achieved in the AMEP are not taken into consideration at all.

—AMEP service provider

SEE requires an additional assessment on numeracy which is not assessed under current AMEP arrangements, however the requirement for a former AMEP student to sit a full ACSF assessment appears to be unnecessary duplication. This duplication indicates that the introduction of the ACSF to the AMEP has not yet resulted in seamless student transition between the two programs.

Key Finding:

Duplication of assessments for students transitioning from AMEP to SEE and insufficient funding for SEE are two key issues preventing better alignment between AMEP and SEE

9.2.3 Addressing the proficiency gap

The ACIL Allen AMEP evaluation (2015b, p.ix) found that many students left the AMEP after 510 hours but still had very low levels of English proficiency. It also found that there is a gap between the ability of those leaving the AMEP program and the minimum level required to enter the SEE program, which expects students to demonstrate regular progression against the ACSF.

The department introduced three changes to address the proficiency gap:

1. An additional AMEP subprogram (AMEP Extend) was made available to clients to improve their LLN skills and to facilitate pathways to SEE or other English learning or vocational courses.
2. Pre Level 1 A and B were introduced to the ACSF to provide benchmarks against which migrants and job seekers with low LLN can show progress in the programs.
3. The KPIs relating to student progress were adjusted to align reporting in the AMEP and SEE. Previously, for students in the SEE Initial Language stream, progress was reported for two indicators every 200 hours. These clients are now required to progress in only one indicator for every 200 hours.

⁵⁰ Teaching English to Speakers of Other Languages

The combination of these initiatives, particularly the development of the Pre Level 1 A and B and the extending of student progress assessment from 100 to 200 hours have been successful in allowing SEE providers to demonstrate the learning progress of students.

Transition patterns from AMEP into SEE

Figure 50 shows the numbers of students who have left AMEP in the past three years and transitioned to SEE.⁵¹ It shows that there has been an increase in the numbers entering SEE each year, with the rate increasing in 2017-18. It is unclear to what extent this rise is attributable to an increase in the AMEP client numbers as a result of additional intakes of Syrian and Iraqi refugees over the previous years.

It is possible that the alignment measures have contributed to faster transitions from the AMEP into SEE. Figure 51 below shows that prior to the NBM, transition to the SEE program for most AMEP students occurred over a period of one to three years after their final year in AMEP. However, in 2017-18 there was a marked increase in the numbers transitioning onto SEE in the same year that they left AMEP.

Key Finding:

There is evidence of AMEP students transitioning more quickly to the SEE program under the NBM compared to the previous contract.

The introduction of the Pre Level 1 A and B, and alignment of student progress assessment from 100 to 200 hours has successfully created the means for AMEP students transitioning to SEE to demonstrate learning progress.

Figure 50: Number of AMEP students that transition to the SEE program

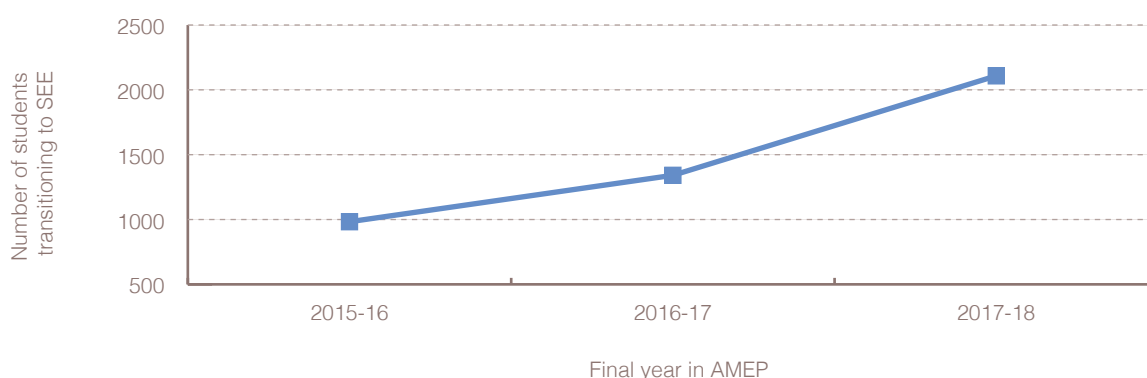
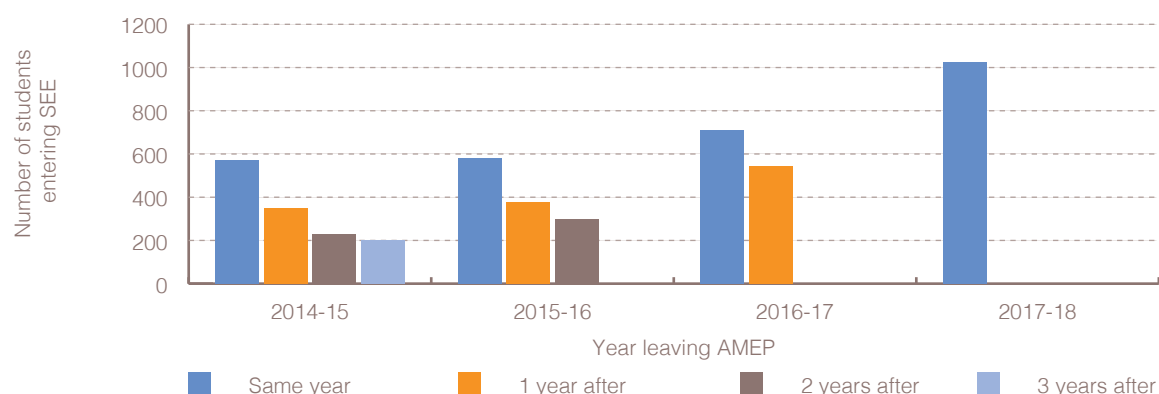


Figure 51: The year of student enrolment in the SEE program compared to the final year of AMEP



⁵¹ The program dataset available to the evaluation does not include students who commenced in the AMEP prior to 2013-14. Numbers of transitioning students in 2013-14 and 2014-15 appear to be low, as students who had commenced in previous years were not included in the dataset. 2015-16 is used as a starting point in this analysis because data for this year includes students who commenced in the AMEP in the two preceding years and is more likely to reflect actual numbers of transitioning students.

9.2.4 The need for post-Adult Migrant English Program pathways

A recurring theme of the evaluation has been the issue of transitioning students into appropriate English programs and vocational pathways when their AMEP hours have been exhausted. The department and service providers have refined and improved the transition of eligible students from the AMEP to SEE, but budget restrictions and eligibility criteria limit the availability and suitability of this pathway.

While successful student transitions are a key focus of the AMEP, case studies and interviews have highlighted several challenges. The Darling Downs case study identified that addressing this complex issue requires improved coordination between AMEP, Humanitarian Settlement Program (HSP) providers, jobactive providers, and state government programs which at times actively compete with and disrupt student English learning. As one service provider reported, the KPIs of the HSP are in competition with AMEP participation KPIs. They noted the requirement for the HSP to support 30 per cent of their clients to enrol in other education and training (not English language lessons) within 12 months of arrival.⁵² A stakeholder in a different case study expressed concern that the AMEP 'does not work in a coordinated fashion with other key services such as employment and settlement services'.

The prevailing view from many of the case study focus groups was that the 510 hour AMEP allocation was insufficient. Some of the Melbourne focus groups included students who had finished their hours but

who were continuing their English learning after purchasing more hours through a subsidised state government English program. As one student related, 'it is a necessary investment'.

Alignment between the AMEP and other language and vocational training could be facilitated by:

- formal agreements with state and territory governments to transition students to state-supported English learning programs and appropriate vocational pathways after completing AMEP
- collaboration with jobactive providers to recruit local employers to include structured 'on-the-job' learning in AMEP
- improved coordination with HSP providers to plan client vocational pathways
- formally developing student pathways that include co-enrolment in vocational courses (e.g. child care, aged care).

Recommendation – AMEP alignment to Skills for Education and Employment (SEE) and other programs

The department should continue to improve the alignment of the AMEP to the SEE program, particularly in terms of information sharing between programs to eliminate duplication of assessments.

The policy focus on alignment should be extended to include improving transitions for all AMEP students into further English learning and vocational pathways. Future funding models might fund service providers to monitor, support and document student transitions.

⁵² Note that this HSP KPI is currently waived pending a review by the Department of Social Services (DSS)

9.3 Innovative Projects funding

9.3.1 Introduction

Prior to the introduction of the new business model (NBM), no project-based funding was available in the Adult Migrant English Program (AMEP). The 2015 ACIL Allen (2015a, p.97) evaluation recommended that the AMEP would:

benefit from research into alternate models of operation. This could include the development of additional incentives for innovative delivery within the program, such as a grants programme to pilot innovative models of delivery, to undertake research into client needs and effective delivery methods, or to establish networks for knowledge sharing and the exchange of ideas.

Subsequent to this recommendation, the department established the Innovative Projects funding (IPF), inviting service providers, through a competitive process, to develop, trial and report on innovative service delivery. It was hoped that innovative projects would strengthen the AMEP, provide the department with key learnings from these projects for operational and future policy development, inform service provider behaviour and deliver better student outcomes. Funding for IPF was redirected from the former Home Tutor Scheme Enhancement Program.

In 2017-18 the department called for submissions for projects identified by service providers. Eight projects were funded:

- South Metropolitan TAFE: AMEP Clients: How to recognise your existing skills and how to gain new skills in Australia
- North Metropolitan TAFE: 'In Australia I will be...' Teaching AMEP students the art of positive storytelling to empower them for training and employment opportunities

- North Metropolitan TAFE: START! – Tailored migrant start-up business sessions
- Learning for Employment: AMEP EAL Framework Task Bank
- AMES Australia: Employment Matters
- Melbourne Polytechnic: SLPET Alumni
- TAFE NSW: Digital Literacy for accessing government services online
- TAFE QLD: AMEP Youth Mentoring Program

In 2018-19, the theme for projects was 'preparing for the workplace'. Five projects were funded:

- Navitas English Pty Ltd: White Card Preparation Course
- North Metropolitan TAFE: Skill up through volunteering—Engaging in Conservation
- TAFE NSW: Toolkit for Volunteering—A pathway to future employment for AMEP students
- TAFE NSW: Employment e-Book
- TAFE QLD: AMEP Unite

Service providers responsible for delivering the Innovative Projects were invited to make presentations to all service providers at the annual AMEP and Skills for Education and Employment Forums in 2017-18 and 2018-19. All providers also had static displays of their projects at a forum in 2018-19. The forum presentations and project reports are placed on the AMEP GovDex shared site. The department reports that the added flexibility of the GovTEAMS site (which replaces GovDex on 1 July 2019) will enhance accessibility of the Innovative Projects for all service providers.

9.3.2 Stakeholders involved in Innovative Projects Funding were positive about benefits

Six service providers reported that IPF is beneficial for AMEP students.

Innovative projects funding has been a welcome introduction in the NBM, allowing AMEP providers to explore creative ways to support AMEP student outcomes and to consider options beyond the limits of the AMEP compliance and funding model.

—AMEP service provider

Only 20 respondents to the teacher survey indicated that they were involved in a project funded by IPF. Of these respondents, 70-80 per cent responded positively regarding the success of these projects to increase participation, student wellbeing and effectiveness of teaching and learning.

9.3.3 Suggestions from stakeholders for improving Innovative Projects funding

No stakeholders were highly critical of IPF, but several suggestions for improvement were made by service providers in submissions and interviews.⁵³ Three service providers noted that the findings and outcomes of Innovative Projects have not been effectively disseminated across the AMEP.

There is limited information available on these projects, outcomes or findings from research which other providers can access and implement in their regions. The funding may need to include the provision of resources or learning tools developed to be published and accessed by other providers.

—AMEP service provider

The department has reported that, in fact, the project reports are published on GovTEAMS, the digital platform for the Australian Public Service. This disparity of views regarding report availability would suggest that although the reports are available to providers, awareness of their availability is not

high. Two providers who commented on the lack of reporting were themselves recipients of the funding.

Key Finding:

While Innovative Project funding has been welcomed by AMEP service providers, findings do not appear to be well disseminated. Consequently, their outcomes may not be being applied to maximum benefit.

Additionally, three providers reported that a longer timeframe would have been beneficial to consolidate projects. Two teachers and one service provider suggested that the scope for projects should be more flexible than the current themes provided by the department.

Three service providers also expressed concern that some of the funded projects appeared to merely reflect best practice in English language teaching, rather than innovation.

Some projects to which funding was allocated across Australia duplicated areas or processes that would appear to form part of normal AMEP delivery i.e. resource creation and work experience programs.

—AMEP service provider

Two of these providers spoke positively of the AMEP research unit that existed for several years in previous contracts and the role it played in identifying and disseminating best practice. Under the *Immigration (Education) Act 1971*, the Minister has a legislative power to 'arrange for the conduct of research projects designed to improve the form or content of approved courses.'

The findings presented in this section, along with those presented in the section on Targeted Tuition Streams, indicate that the AMEP would benefit from developing ways to cater to the particular needs of its diverse student cohorts. Several stakeholders and members of the evaluation Advisory Committee also pointed out that the AMEP does not have a digital literacy strategy. Digital literacy contributes to successful settlement for migrants to Australia and a strategy to support AMEP students in this area would strengthen the AMEP.

⁵³ The following suggestions are reflective of a small number of stakeholders only. This is because the majority of teachers and many service providers have not been involved in IPF.

Recommendation – Innovative Project funding

Funding for innovative projects should be retained, however the department should develop a more long-term, systemic approach to innovation and dissemination of best practice.

This approach should involve processes that encourage collaboration between teachers across service providers to form ‘communities of practice’ that focus on innovative pedagogical approaches to address the needs of specific student cohorts in the AMEP.

These ‘communities of practice’ would develop innovative projects that could be applicable across the AMEP and not isolated to individual service providers. The proposed AMEP Advisory Committee could advise on ways to foster these collaborations and identify learnings that may be integrated into the design of future AMEP subprograms.

9.4 Payment for tuition

9.4.1 Introduction

This section explores the appropriateness, effectiveness and practicality of the Adult Migrant English Program (AMEP) funding model, specifically the 'hourly tuition fees across AMEP tuition streams, Special Preparatory Program (SPP) and Settlement Language Pathways to Employment and Training (SLPET).' Under the previous contract, service providers were paid using the following fee structure:

- General AMEP tuition
 - general AMEP fee
- SPP tuition
 - higher fee than the general AMEP fee
 - maximum class size of 12
- SLPET tuition
 - higher fee than the general AMEP fee
 - additional work placement match fee.

Fees for all tuition modes were paid on a 'scheduled hours' arrangement. If a student attended all or part of a scheduled learning activity, the provider was paid for the whole session. The provider was not paid if the student did not attend the session.

Common fees across tuition modes

The new business model (NBM) introduced a common tuition fee across all tuition modes, general AMEP tuition, SPP and SLPET and the newly introduced AMEP Extend. The work placement match fee was retained for SLPET.

The evaluation interview and submission questions asked service providers to comment on the appropriateness, effectiveness and practicality of hourly tuition fees across AMEP tuition streams.

Only two service providers commented on SLPET funding. Both stated that SLPET classes required more funding than standard Pre-Employment classes because of the cost of having additional teachers to provide vocation-specific training.

The appropriateness of eliminating specific funding for SPP classes is discussed in section 5.1. This analysis identified stakeholder concern that the removal of the SPP-specific fee and maximum class size has resulted in a decrease of the individualised support and tailored learning opportunities for the humanitarian cohort.

The appropriateness of separate tuition fees for Pre-Employment and Social English is discussed in section 5.3.

Approved and unapproved absences

If a student is absent from a scheduled class, such absences are classified as either approved or non-approved. If a student's absence is approved (because they have a substantiated, approved reason such as a medical appointment) they do not lose any of their 510-hour entitlement. If the absence is non-approved, the student forfeits the missed hours. Whether or not the absence is approved, the service provider is not paid for these hours. The department advised that the purpose of this policy is to encourage students to advise their teachers of expected absences to assist with classroom resourcing.

Payment for actual hours of attendance rather than scheduled hours

A significant change introduced by the NBM was the shift from a 'scheduled hours' funding model to an 'actual hours' model. Under the scheduled hours payment arrangement of the previous contract, the service provider was paid for the hours the student was scheduled to attend (as long as they attended for at least part of the session). Currently, tuition fees are paid for the hours the student was actually in attendance. This 'actual hours' funding model is intended to benefit students by giving them the opportunity to recoup hours of tuition they have not attended of a scheduled learning activity.

9.4.2 The actual hours model has financially disadvantaged most service providers

Ten service providers indicated that payment based on actual hours attended instead of hours of tuition scheduled has had a negative financial impact. Service providers cannot accurately predict attendance numbers and must provide staff and resources according to enrolment numbers. This was true under the previous contract, where service providers were not paid if a student did not attend a session, but the move to hourly payments instead of session payments has exacerbated the issue.

If a client arrives at class late or leaves early, the provider is not paid for the time missed by the client. Given that the provider still must pay for the teacher and all the associated program overheads, this makes it difficult to deliver the program at break-even level.

—AMEP service provider

Six of these providers pointed out that this funding arrangement does not take into account the difficulties and complexities faced by migrants to Australia, who often miss classes to attend appointments with jobactive or Humanitarian Settlement Program (HSP) providers, to deal with medical issues, to care for children and relatives and to attend family and cultural commitments. The cost of running classes remains constant regardless of absent students, but the payment received is reduced.

Two service providers pointed out that knowledge of AMEP patterns of attendance is necessary to inform a tender price under the actual hours model. One provider —new to the AMEP— suggested that a lack of information about attendance rates had led to them underestimating the costs of service provision and making a financial loss. The other stated that their prior experience in the AMEP had allowed them to estimate an appropriate increase in hourly fee to compensate for the actual hours model. This provider recommended, nevertheless, a return to the 'adjusted offered hours' model of contracts prior to 2011. Under this model the service provider was still paid a portion of the tuition fee in the case of a student absence.

Key Finding:

Under the actual hours funding model, there is a significant cost to service providers of partial student attendance.

9.4.3 The current funding model places a significant administration burden on teachers and service provider staff

Six service providers stated that the process of determining whether a student's absence is approved or non-approved creates a significant administrative workload for teachers and service provider staff. Eight respondents to the teacher survey also commented on the burden associated with approving absences.

Payment on attendance only and 're-crediting' students hours if they have had an approved absence adds a huge layer of work for providers.

—Teacher survey respondent

As the provider is not paid if a student is absent, the time spent determining the reason for an absence is not recuperated by any tuition fees and must be absorbed by the service provider.

Five service providers were critical of the requirement to record arrival and departure times of students throughout the teaching session. 'Actual hours' was initially interpreted strictly by the department and required teachers to record attendance to the minute. In response to the administrative workload experienced by teachers, the department relaxed this requirement to recording arrival times later than 15 minutes after the start of class and departure times earlier than 15 minutes before the scheduled end of the class. Where a student is more than 15 minutes late or leaves more than 15 minutes early, the time not in class is not deducted from their entitlement and the service provider is not paid the tuition fee.

Tracking student attendance in terms of hours attended rather than teaching session attended is still onerous for teachers. Six teachers raised this issue in interviews and ten teachers chose to comment on this process in the teacher survey.⁵⁴ They stated that recording late arrival and early departure times was taking time out of their teaching.

Removing the requirement to record all the arrivals/departures would allow teachers to concentrate better on the class.

—Teacher survey respondent

Figure 52 shows that, of the teachers who knew about the impact of the hourly funding model, a majority saw it as having a negative impact on time spent on administration.

This view is also held by AMEP data administrators who were asked in a recent survey for key areas of improvement to AMEP Records Management Systems (ARMS) and the AMEP Reporting Facility (ARF). Eighty-three per cent of respondents identified attendance adjustments and 43 per cent identified unapproved absences.⁵⁵ As ARMS only records full session attendance and approved absences, late arrivals, early departures and unapproved absences are accounted for on a spreadsheet and submitted through the ARF. In the first two years since this policy was adopted, the department reports that service providers have entered around 360 000 attendance adjustments and 110 000 unapproved absences into the ARF, and have been required to validate the data monthly. The department runs weekly reports to adjust

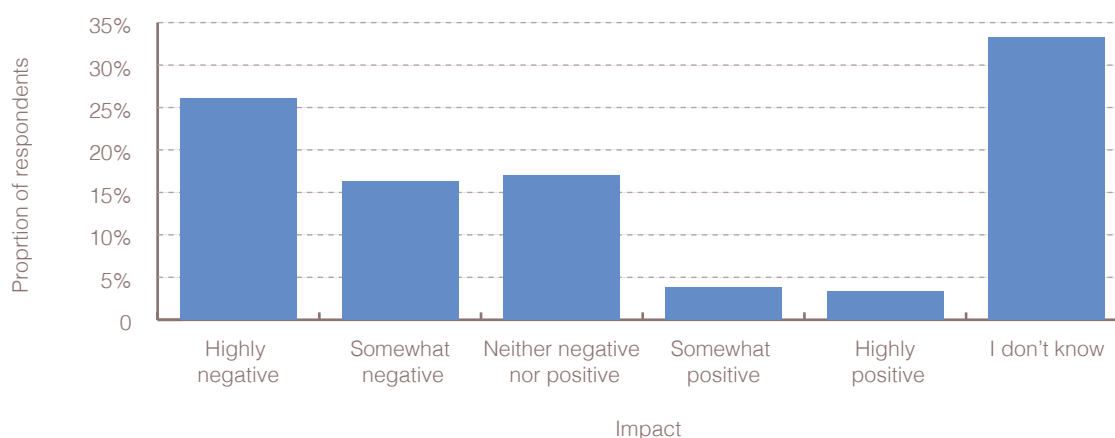
attendance and student entitlement in ARMS. Up-to-date records of students' remaining AMEP hours are not available in real time and providers must run a report in the secondary ARF application to monitor student entitlement.

The adjusted attendance process resulted in an average 2.8 per cent variance between AMEP students' scheduled attendance and actual attendance. As a result of the attendance adjustments, each affected student retained an average of 6.7 hours of their entitlement. The total cost of adjustment in 2018-19 (to 30 April 2019) was \$3.18 million in tuition fees not paid to service providers (2.7 per cent of total unadjusted cost).⁵⁶

Twenty-five per cent of students forfeited entitlement for unapproved absences and had 19 hours on average deducted from their 510 hours. It is worth noting that a portion of students are losing a large number of entitlement hours, with 1 345 students forfeiting 50 hours or more.

The introduction of a new information management system would probably alleviate some of the administrative burden and inefficiencies. However, it would not completely resolve the issue of teachers having to record student arrival and departure times. Three service providers and teacher interviews/survey responses suggested that the focus on student attendance under the current funding model can have a detrimental effect on students or compromise the relationship between students and providers. The following examples were given:

Figure 52: Teacher survey: impact of hourly tuition fees on time spent on administration (n=264)



⁵⁴ The survey did not explicitly ask teachers to comment on recording departure and arrival times. It asked more generally about implications of the funding model. It is possible that not all teachers were aware of the connection between the funding model and the recording of attendance.

⁵⁵ Data provided by the department.

⁵⁶ Data provided by the department.

- Contacting students to ask about their absences and to emphasise regular attendance can be stressful for the students, many of whom already have stressful lives.
- The monitoring of arrival and departure times gives students the impression that teachers are particularly strict and undermines the adult learning environment.
- Students with very low English proficiency have a limited capacity to explain their absences and are therefore the most likely to be penalised.
- Students feel their privacy is being invaded when they are questioned about their reasons for not attending.

Given one of the intentions of the actual hours funding model is to benefit students by allowing them to recoup missed hours, the system should be modified to reduce stress on students while continuing to recognise their legitimate reasons for missing class. Providers and teachers disagreed about the level to which students should be held accountable for missed classes, but there was a strong consensus that the current level of attendance monitoring is detrimental to teacher wellbeing and student learning.

Key Finding:

The new funding model has significantly increased the administrative burden on service provider staff, particularly regarding the recording of student attendance.

The administrative burden associated with the adjusted attendance policy far outweighs the benefits to students and creates costs for service providers in addition to fees withheld for student partial attendance.

9.4.4 Cessation of separate funding for counselling has reduced support for students

Under the previous AMEP contract, providers were funded to provide counselling services to AMEP students. Counselling services attracted a separate fee to tuition and were paid hourly for a maximum of six hours per student.

Under the NBM the service providers cannot charge a separate fee for counselling. Counselling and Individual Pathway Guidance is incorporated in the commencement fee that covers student eligibility check, initial assessments, registration and enrolment, and applications for extensions. The commencement fee is based on the rate tendered by the service provider.

AMEP service provider instructions state that Pathway Guidance for AMEP students consists of 'ongoing vocational and educational support after every assessment and at the exit interview'. An Individual Pathway Guide (IPG) is created for each student in the AMEP.

Interview and submission feedback from five service providers and one community organisation noted that the removal of separate funding for counselling in the AMEP was a negative development. Comments provided by seven teachers in the survey echoed this view.⁵⁷ These stakeholders explained that under the new model, pathway guidance focuses on tracking a student's educational progress through the AMEP, rather than broader case management. They reported that, previously, counsellors had more capacity to talk to students about issues such as attendance in class, housing, health and general wellbeing. It should be noted that the policy does not preclude these conversations, but that the payment structure does not incentivise broader case management.

Key Finding:

Removal of separate funding for AMEP counselling has resulted in a shift in focus from case management to tracking the progress of students in the AMEP.

⁵⁷ The teacher survey did not specifically ask about the funding for pathway guidance/counselling. These specific comments on counselling were provided in response to broader questions about the AMEP.

9.4.5 Summary and recommendation

Changes to the payment model have had a range of adverse impacts on service providers and disincentivised important elements of AMEP provision such as small classes and case management. In order to support service providers to propose realistic fees at the time of tendering, prospective providers require a good understanding of the potential impact of the funding model. Key information required to understand the impact include:

- existing and projected clients
- the number of hours used by students
- attendance patterns
- costs and issues associated with child care.

Recommendation – Funding model

On the understanding that the funding model design influences service provider behaviour, the department should work with providers to develop a funding model which reduces administrative burden, and incentivises practices—such as smaller class sizes for the Special Preparatory Program and holistic case management—that improve English language acquisition and settlement outcomes.

Details of the funding model and an associated minimum dataset should be provided to prospective tenderers as part of future contract tender processes.

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Appendix A: Impact of SPP on the English proficiency of humanitarian entrants

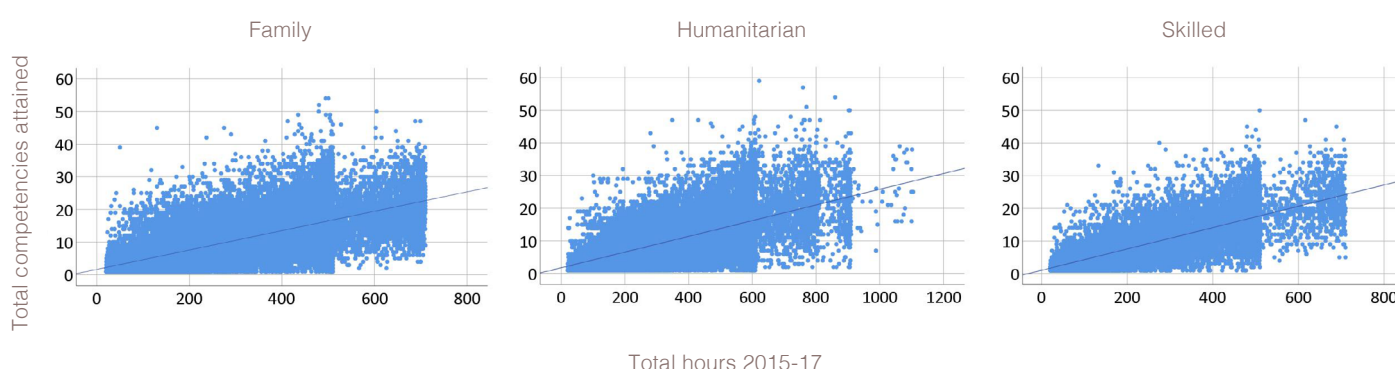
The evaluation analysed program data to determine the extent to which the SPP hours assist in mitigating the negative impacts of humanitarian migrants' pre-migration experiences. The following figures plot the progress of all students between July 2015 and July 2017. Student progress was measured using the total number of CSWE competencies that students attained during their time in the program.⁵⁸ Figure 53 plots this progress against the number of hours completed by each student. This process does not isolate the benefit of the SPP for participants, but it does show that the AMEP is providing learning outcomes to humanitarian migrants to almost the same level as that of skilled and family visa stream migrants.

The figure shows that there is a medium to strong correlation between AMEP progress and total hours spent in the program from July 2015 to July 2017 for all visa streams. At 500 hours, progress is predicted to be 14 competencies for humanitarian students, 17 competencies for family students and 18 for skilled students. Although skilled visa stream students progress slightly faster, there is little difference

between the progress of the different visa streams once SPP hours are included in humanitarian students' level of progress. After 600 hours the humanitarian students progressed to a similar extent as the family visa students, and after 650 hours, they progressed to a similar extent as the skilled students.

The average SPP hours used by humanitarian migrants in 2015-16 was 81 hours for SPP100 students and 258 hours for SPP 400 students. Across the whole humanitarian cohort the average was 77 hours. This average has increased to 88 hours in 2018-19. Adding in 100 additional hours brings the progress of the humanitarian migrants to 16 competencies which is similar to their family counterparts and almost to the same amount of progress attained by the skilled migrants. However, the final level at which humanitarian students exit the program may still be lower than that of family or skilled students. This is because a student's progress occurs over and above their entry level proficiency. On average humanitarian students start at a lower level of proficiency than their skilled and family counterparts.

Figure 53: Number of CSWE competencies attained compared to hours completed, according to visa stream July 2015-July 2017⁵⁹



⁵⁸ Please note that the evaluation is using the program progress data from the previous contract (2013-2016-17) – i.e. CSWE module progression, to demonstrate student progress. We do not make the same comparison in the NBM using the ACSF results as, for reasons that are explained in sections 6.3 and 7.1, direct comparisons with ACSF progress may be misleading.

⁵⁹ The relationships between CSWE progress and total hours spent in the program from July 2015-July 2017 are described by the following regression equations:

- Family students: Competencies attained = $0.03 \times \text{Total hours} + 1.7$
- Humanitarian students: Competencies attained = $0.024 \times \text{Total hours} + 1.8$
- Skilled students: Competencies attained = $0.033 \times \text{Total hours} + 1.0$

All visa streams show a medium to strong correlations of about 0.7 between total hours and competencies attained, which is statistically significant.

Appendix B: Key Performance Indicators of the previous contract

KEY PERFORMANCE INDICATOR PREVIOUS CONTRACT
1.1 A minimum of 85% of AMEP clients are interviewed by the AMEP counsellor within four weeks of registration with the AMEP
1.2 A minimum of 85% of AMEP clients commence in the AMEP within six months of being interviewed by the AMEP counsellor
1.3 A minimum of 60% of AMEP clients exited by the service provider receive exit interviews
1.4 A minimum of 5% of AMEP clients are referred by the AMEP general service provider to the distance/e-Learning provider
1.5 A minimum of 60% of active clients with SPP hours are assigned to a SPP only Learning Activity
1.6 A minimum of 85% of AMEP clients eligible for and seeking child care are offered a place with an approved provider from the date the client commences class
1.7 100% of data related to classroom tuition is entered in ARMS by the service provider within 14 days of Service Provision
2.1 A minimum of 90% of AMEP clients who commence in a Settlement Course have completed a Settlement Course
2.2 A minimum of 90% of AMEP clients exited by the service provider who have not completed a CSWE Certificate or the Pre-CSWE Course have achieved a Statement of Attainment
2.3 A minimum of 80% of AMEP clients exited by the service provider complete eight (8) or more English language learning outcomes
2.4 A minimum of 45% of AMEP clients exited by the service provider complete a CSWE Certificate or the Pre-CSWE Course
2.5 A minimum of 80% of AMEP clients who exit the SLPET sub-programme have completed the SLPET sub-programme
2.6 The attrition rate for clients who commence in a SLPET Learning Activity is not greater than 20%