



Submission on the Reform of the Adult Migrant English Program

July 2021

The Settlement Engagement and Transition Support Community of Practice (SETSCoP), facilitated by [Migration Council Australia \(MCA\)](#), welcomes the opportunity to contribute a submission in response to the discussion paper on the Reform of the Adult Migrant English Program (AMEP).

SETSCoP is a national collaboration of settlement organisations who assist vulnerable migrants and humanitarian entrants under the Settlement Engagement and Transition Support (SETS) program. Settlement support is provided to eligible migrants and humanitarian entrants, many of whom are engaged in AMEP while receiving the SETS support. SETSCoP facilitates the sharing of best practice and expertise for effective settlement, in addition to the collective identification of issues and opportunities.

The considerations and recommendations provided in the submission are based on input from SETSCoP members through extensive consultation.

There is significant support for major reforms to AMEP. Redesigning AMEP to enhance sustainable English acquisition outcomes will in turn contribute to the full participation of migrants and humanitarian entrants. Appropriate reforms can better support migrants and humanitarian entrants, particularly those who have struggled with access to, engagement in or support from the program to date. A model that makes English tuition more accessible, that leads to better quality outcomes and encourages greater participation is required. The recent introduction of more flexible eligibility requirements and the removal of timeframes on class hours and limits on registration, commencement and completion of tuition, provides a good foundation for further reforms. More work is needed to ensure that those most vulnerable, who have intersectional issues which hinder their ability to fully engage in and learn English, are given the best chance for English acquisition. If done well, the reforms can facilitate greater success by setting up students for further education and employment.

As highlighted in a recent review of outcomes for humanitarian entrants who have settled in Australia, there is opportunity for the reforms to consider collective impact approaches and to tailor English provision to meet the particular needs of vulnerable groups.ⁱ Augmenting cross-sector collaboration between AMEP providers and settlement organisations will enhance the economic, social and civic participation of vulnerable migrants and humanitarian entrants.

To maximise the success of the AMEP reforms, consideration should be given to the following:

- Reform changes are complementary to and encourage greater collaboration with SETS and other settlement programs.
- Role of AMEP, settlement services and other relevant stakeholders are clearly defined to enhance complementarity of services and promote close collaboration with settlement organisations to maximise outcomes.
- A more client-centric, flexible and outcomes-driven model is required where individualised plans with target milestones of success are established.
- There are financial incentives to ensure extended and tailored support to maximise outcomes for those most vulnerable.
- In addition to a national curriculum, there should be comprehensive screening and standardised assessment measures which help identify client areas of need, barriers to English language development and other considerations.

- Introduction of a community-based learning stream and a work-based learning stream which align to individualised plans and lead to enhanced social, economic and civic outcomes.

An outcomes-based model that safeguards the most vulnerable

There is value in AMEP shifting to an outcomes-based model, provided outcome payments are appropriately linked to individual student progression rather than being solely tied to the attainment of a qualification. Outcomes-based payments can offer more flexibility for AMEP providers by allowing them to better meet client learning needs and drive successful outcomes.

Safeguards are needed to mitigate the risk that outcomes-based funding does not become an incentive in itself and that the program is primarily driven by students' educational achievement. Further, any monetary incentives should seek to protect, support, and retain students who require additional assistance. Providers should be encouraged to deliver inclusive and targeted support for students who face numerous barriers to attaining English proficiency, such as those who are illiterate in their first language or students who have had no or limited formal education before migrating to Australia.

The issue of incentivisation and its unintended consequences leading to disadvantaging some program participants have been observed in the structure of the current jobactive program whereby outcomes-based payments have incentivised a greater focus on easy-to-place clients and away from those who require more intensive assistance. There should be incentives to retain clients with greater support needs and provide them with adequate assistance to reach their potential for English language acquisition.

Many humanitarian entrants have experienced trauma from witnessing conflict and war. Trauma can lead to issues with memory or concentration which may impact on a person's ability to learn English. It is recommended that initial assessments for the AMEP consider not only prior education levels but also pre-migration experiences and other factors that could affect learning ability, such as trauma and mental health issues, literacy in first language, learning difficulties and physical or cognitive disabilities. A comprehensive assessment process would provide a more complete view of the student through a better understanding of vulnerabilities and barriers to learning. To do this, AMEP providers should work closely with settlement organisations who can provide insights and share their settlement expertise. Effective partnerships between settlement organisations, AMEP and jobactive (future NESM) will also offer a holistic approach in the support of mutual clients and will enhance social, economic and civic participation.

Outcomes-based models may present some issues which require thorough consideration. Firstly, there is risk that students could be rushed through the program to facilitate outcomes-based payments. Conversely, there is risk that students could be retained for longer than necessary to maximise the number of outcomes-based payments. The new model should consider a funding structure which enhances the financial viability and longevity of AMEP providers, while ensuring quality services and supports for students, with safeguards for those more vulnerable.

Recommendations:

- A comprehensive funding structure to include a baseline amount, in addition to incentives tied to the support for students to meet outcome milestones which are client-centric and aligned to an individualised student plan.
- A funding structure that safeguards the most vulnerable through incentivisation of targeted support for those with additional barriers, leading to sustainable outcomes for a greater number of students.
- Significant consideration given to mitigating incentive loopholes and preventing inappropriate attainment of outcomes-based payments.
- Strong partnerships and collaboration with settlement organisations and other relevant stakeholders through financial incentives that are linked to joint projects to support mutual clients.
- Intermittent random audits by external assessors to ensure appropriateness of student progress to outcomes-based payments received.

A flexible approach to service delivery

A more flexible approach in the delivery of AMEP would increase the engagement of recently arrived migrants and humanitarian entrants. This would particularly benefit those who have had competing demands which have impacted class attendance and hindered their completion of AMEP. Greater flexibility around class times and delivery methods (e.g. option of face to face or online classes) is needed and should take into account the issues that are faced by students who have work and/or family commitments. Classes that are held outside of normal business hours will greatly encourage the regular participation of students who have full-time employment. A greater investment in student supports, including access to childcare will optimise student attendance and participation in the AMEP program for those with caring responsibilities.

Additionally, to maximise the success of students, flexible teaching methods to suit the differing learning styles of students will contribute to enhancing English language skills development. Student learning styles could be identified through the comprehensive assessment at enrolment and could feed into how curriculum under the learning streams is delivered and tailored to individual students.

AMEP providers should implement alternative modes of service delivery to meet the needs of their students, particularly of those enrolled in distance learning. Options for face to face and online classes should be provided while considering the additional challenges faced by those in regional areas. Challenges unique to regional students include the grouping of students across levels in the same class due to smaller numbers and access issues for those with limited digital literacy, inadequate internet access or those without the required technology devices.

Recommendations:

- Greater flexibility in service delivery, which seeks to address common barriers to attendance and the achievement of outcomes for people from migrant and refugee backgrounds.
- A holistic approach to student learning, which considers learning styles, so that curriculum is tailored and enhances student success.
- Consideration of and solutions to the additional barriers and challenges faced by AMEP students in regional communities.

Community and work-based learning streams

The development of two distinct learning streams, a community-based learning stream and a work-based learning stream is welcomed. Allocation to streams should be based on information gathered at the initial assessment, which captures student goals and aspirations post AMEP, current English language proficiency, pre-migration experiences, previous formal education and other relevant considerations.

As part of a comprehensive assessment process, SETSCoP supports the funding of pathway counsellors who can work with students to develop learning plans that demonstrate an individualised pathway to English language development. Through the creation of tailored learning plans, AMEP can be delivered to amplify the usefulness of English for the student and maximise their economic, social and civic participation.

For the community-based learning stream, AMEP providers should look to work closely with settlement organisations in the provision of conversational language classes that are held in outreach locations such as settlement service offices. In addition to focusing on conversational English, the community-based stream could include basic written, listening and reading skill development to equip students to manage day to day interactions in Australia. Community-based learning should still be a standardised curriculum to track progress but not necessarily formally accredited.

The work-based learning stream can significantly enhance the employment prospects for migrants and humanitarian entrants through preparing them for work in Australia by improving their English language proficiency. Curriculum that focuses on teaching English language skills that are targeted to career pathways, particular industries and that meet local employment needs, would reap significant benefits for both AMEP students and employers. To enhance the successful outcomes resultant from the work-based stream, AMEP providers should work closely with settlement organisations, who can help facilitate linkages to local employers and jobactive providers.

Recommendations:

- Student allocation to learning streams is based on a comprehensive assessment process, which includes a meeting with a pathway counsellor to develop an individualised learning plan.

- AMEP providers should work closely with settlement organisations in the provision of classes under the community-based learning stream.
- To identify local employment needs and maximise employment outcomes, AMEP providers should develop strong partnerships and collaborations with settlement organisations who can help facilitate connections to local employers and jobactive providers.

Introducing a comprehensive national curriculum

SETSCoP supports the introduction of a national curriculum for AMEP. A comprehensive assessment and curriculum framework will allow for a consistent and standardised approach to teaching English and measuring student progress across speaking, reading, writing and listening.

A national and standardised curriculum will give teachers more time and capacity to support the learning of their students rather than investing resources into the development of assessments and class sessions. There would be value in the creation of a curriculum that is successive and aligned to assessment milestones. Decisions with regard to the curriculum content and assessments should be evidence-based yet flexible to meet the needs of a diverse range of migrants and humanitarian entrants.

Recommendation:

A comprehensive national curriculum that is evidence-based and meets the needs of all students, that is linked to learning plan progress and assessment milestones.

For more information regarding this submission, please contact the SETSCoP Secretariat Samantha Moore at secretariat@setscop.org.au or (02) 6162 0361.

ⁱ Shergold, P., Benson, K. and Piper, M. (2019). *Investing in Refugees, investing in Australia: The findings of a review into integration, employment and settlement outcomes for refugees and humanitarian entrants in Australia*. <https://www.homeaffairs.gov.au/reports-and-pubs/files/review-integration-employment-settlement-outcomes-refugees-humanitarian-entrants.pdf>