

## Reform of the Adult Migrant English Program

July 8<sup>th</sup>2021

ACEVic is the peak policy, advocacy and information body for the adult community education (ACE) sector, representing Victoria's Learn Local (LL) organisations. ACEVic's purpose is to advocate for and support our members to provide high-quality, innovative and responsive adult education programs that improve the educational, economic and social prosperity of individuals and communities.

ACEVic is proud to represent and support community-based and managed LL organisations, providing education and training to promote engagement and pathways for learners. ACEVic works to ensure adult and community education is accessible to all Victorians. We are committed to increasing levels of educational attainment throughout Victoria. Our work with LL organisations is undertaken with respect and integrity, supporting providers in the delivery of quality and innovative community-based education.

As a key stakeholder in adult and community education in Victoria, ACEVic appreciates the opportunity to provide input to the Department of Home Affairs' proposed reforms to the Adult Migrant English Program (AMEP). This response to the AMEP discussion paper reflects ACEVic's perspective as well as incorporating feedback provided by our member Learn Local (LL) organisations who deliver the AMEP.

With over 25 community-based organisations delivering the program across multiple sites, it is critical the ACE providers voice is included in the proposed reforms to the AMEP. ACE plays a pivotal role in the pathways to success for vulnerable learners with migrant and refugee backgrounds who participate in the AMEP. Highly skilled English language teachers, along with the supportive, flexible and inclusive learning environments, contribute to the success of English language programs within adult and community education.

In consultation with ACEVic members the following feedback identifies both positive changes and some concerns regarding the proposed changes to the AMEP.

The introduction of a new information management system (IMS) is applauded by the ACE sector as the current ARMS system is outdated, inefficient and not fit for purpose. Providers are keen to start using a new IMS prior to the expected date in 2023. The sector warmly welcomes the inclusion of an additional payment of six hours of strengthened pathway guidance.

Conversational classes utilising volunteer tutors are common across the ACE sector. Providers would welcome a new business model to fund these programs. Considerations include:

- a framework for skills development of volunteer staff
- training of volunteers by AMEP providers
- a structured approach for learners to articulate to AMEP
- a pre-accredited curriculum framework to provide structure and quality standards.

Some providers have stated they need further information on the proposed changes to the community-based learning system program to be able to give informed feedback, including details on the inclusion of administrative support. There is some concern if the community program is opened to all community groups that unscrupulous organisations or individuals may seek to profit from the program, as has occurred as a result of previous VET funding reforms. To reduce this risk, AMEP-contracted providers could be incentivised to develop partnership/subcontractor arrangements with well-regarded and robust community groups.

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

ACEVic members who deliver AMEP hold significant concerns about the proposed outcomes-based model for units of competency and qualification completions.

Providers question the premise that 'payments on outputs are common in the Vocational Education and Training (VET) sector' and request evidence of outcome-based payments for publicly funded VET. It has been noted the Case for Change is weak and lacking detail of the proposed new payments system, which is the central pillar of the proposed new business model. There are deep concerns on cash flow payments for the three milestones -1) Enrolment 2) Unit completion 3) Qualification completion.

To improve student outcomes, the Victorian EAL Framework and the AMEP Research Centre at Macquarie University recommend an integrated approach to delivery and assessment. This is supported by best practice in teaching English language that encourages a holistic approach with multiple units taught simultaneously. In contrast, the proposed outcome-based model incentivises delivery of single units of competency. Under an integrated approach, it is common for units to be clustered and delivered over a period of one term or a whole semester. Learners can be enrolled, for example, in one Speaking and Listening unit and one Reading and Writing unit at the same time. A general elective may be added to this program. This holistic approach to language development contextualises learning and assists development of learners' settlement skills. This has a significant multiplier effect on their educational experience. Learners may commence multiple units at the same time, reaching up to 180-210 nominal hours.

In the proposed outcome-based model, providers would not be paid for the full unit until completion which could take between 10 and 18 weeks, resulting in a significant delay in cash flow for the ACE providers.

To manage cash flow, outcome-based delivery encourages providers to complete learners in units of competency in the shortest possible timeframe, regardless of best practice in teaching and learning and in contrast to student-centred learning approaches which meet the individual needs of learners. This model discourages providers from supporting the most vulnerable and disadvantaged learners who often need additional support and time to complete units and qualifications.

The reduced income over a period of time adversely affects the providers' ability to maintain teaching and support staff payments, affecting student success and program sustainability. Learners undertaking the AMEP frequently face multiple barriers to participation in education including negative educational experiences, the effects of past and current trauma, family and work obligations, age, health and confidence levels. These learners need supportive, flexible and nurturing learning environments. In line with adult learning principles, adults learn best when they are motivated, self-directed, and autonomous learners. This includes reaching their own goals within attainable timeframes and curating their own learning paths.

Adult and community education providers are experiencing enormous pressure and fatigue from the ongoing repercussions of the COVID 19 pandemic, from finding ways to support and engage vulnerable learners to having to swiftly pivot to blended delivery. They hold grave concerns that the outcomes-based model for the AMEP will add significant fiscal stress affecting provider sustainability and adversely affecting the provision of quality English language training for the most vulnerable adult learners in Victoria.