



RE: IMMIGRATION (EDUCATION) AMENDMENT (EXPANDING ACCESS TO ENGLISH TUITION) BILL 2020

STEPS SUBMISSION:

While we welcome and support the intent of this amendment to expand access to English tuition to migrants into Australia, we also hold a number of concerns which we table here for the Minister's consideration.

1. Concerns relating to removing the statutory time limits on an eligible person's entitlement to English tuition, in order to support and incentivise English proficiency.

While the intent of this amendment is to provide learners with the opportunity to continue English language tuition until reaching the proposed new level of '*Vocational English*', we have concerns that without appropriate scaffolding, unintended consequences are likely to arise. For example, the learner may delay commencement of English language learning, unless appropriate supports are in place to initiate tuition as soon as practical following immigration. Further, without a minimum, statutory (e.g. 15 hours a week) attendance and participation requirement, learners may prioritise other responsibilities, including paid employment, over continuation of English language tuition. Paid employment for those with low level English language attainment is most often associated with low-skilled, poorly paid work. This, combined with poor or sporadic participation in English language tuition is likely to further disadvantage migrants, leading to delayed development of English language skills and thereby diluting their future work aspirations, career progression and full participation in the Australian community and society. Observation of STEPS' students indicates that English language learning is best achieved through regular immersion and participation.

As well as the negative consequences for English language learners, we foresee issues for providers as they endeavour to utilise funds to provide tuition that is both efficient and educationally sound. It is difficult to achieve this goal without some reasonable expectation of ongoing, consistent and regular attendance, as teachers must be timetabled in advance.

2. Concerns relating to the definition of Vocational English, and the proposed change from Functional English to Vocational English as the exit point for eligible English language learners.

STEPS strongly support an increase to the English level exit point for eligible supported migrant learners, however we are concerned that the proposed change to Vocational English does not represent a significant increase in English language skills. The current AMEP program uses the Australian Core Skills Framework (ACSF) to assess individuals

as they enter the program and at the end of each teaching period to measure progress. Once participants reach ACSF level 3 they are considered to have attained functional English and are no longer eligible for the program (exit level).

This legislation change includes changes to the exit point and now uses the term Vocational English as opposed to functional. The Department of Home Affairs has recently emailed AMEP providers the attached advice which defines Vocational English as at 5.5 on the International English Language Testing System (IELTS) scale.

Effectively this is not a change in the exit level at all. Below is comparison of the two frameworks with level 3 ACSF and IELTS level 5.5. It clearly shows that ACSF level 3 is aligned if not slightly higher than IELTS 5.5.

Current AMEP	STEPS Proposal	ACSF	IELTS	Amendment	STEPS Proposal
Functional English	Vocational English	5	9	Vocational English	Vocational English
		4	8		
			7		
			6		
		3	5		
		2	4		
		1	3		
		1	2		
		0	1		

RECOMMENDATIONS:

We propose a number of recommendations for consideration in order to address these concerns and ameliorate the likelihood of adverse and unintended consequences associated with uncapping hours, removing statutory time limits and revising English language proficiency levels.

Recommendation 1: A referral process (e.g. through Centrelink) to access English language tuition should ideally be combined with wraparound support (e.g. social work, psychologist, etc., as required by the individual and their particular circumstances). The funding for this support would be best linked to the AMEP provider, rather than a Settlement Service Provider,

where tensions may arise between the goal to convert migrants to paid (albeit, low-skilled and poorly paid) employment and the need to ensure ongoing and consistent access to English language tuition. For example, STEPS has recently observed the consequences of these tensions in our Northern Territory delivery site, where a Settlement Service Provider has coordinated several weeks of full time fruit picking work for their clients, which has meant that they are unable to attend English language classes.

Recommendation 2: While recognising that paid employment is a desirable and necessary outcome for those endeavouring to improve their English language skills, it is necessary to balance that outcome with the need for ongoing participation in appropriate tuition. Employer obligations might be introduced to ensure that such workers are released and supported to continue English tuition while participating in such employment. Tuition can be vocationally focused, enhancing the workers' skills in areas specifically required for the nature of the work they are undertaking, thereby improving communication, productivity and safety in the workplace, while enabling the workers' continued progress of their English language skills.

Recommendation 3: We recommend that the Government recognise the current and ongoing impact of the COVID pandemic, and the likelihood that this impact will be felt for some time. Due to the requirements for physical distancing, class sizes are likely to be reduced (depending upon the current COVID health guidelines of the jurisdiction at the time and the size of the classroom), thus reducing efficiency and viability of delivery. Increased hourly rates were temporarily introduced under the Extraordinary Circumstances Work Order, however, this arrangement will cease on the 31st December, 2020. Extending the duration of the increased hourly rates until the global COVID pandemic is resolved would enable English language tuition providers to meet the additional costs incurred to comply with COVID health guidelines while still providing quality English language tuition.

Recommendation 4: Finally, we recommend that the proposed change which specifies Vocational English rather than Functional English as an exit point is reviewed. A revised definition of the proficiency should be developed with consideration to the variety of vocational pathways our AMEP participants may wish to pursue. STEPS, for example, regard achievement of a partial level 4 of the ACSF and exit level 6 in IELTS to be a more meaningful change.

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