

## Audit Committee Inquiry into Contract Management

### **Background**

I'm writing to the Parliamentary Joint Committee of Public Accounts and Audit inquiry into the administration of the Adult Migrant English Program contracts.

I have worked in the Adult Migrant English Program since 1988 as a classroom lecturer and believe I have extensive knowledge and experience of the AMEP from 'on the ground'. I currently work as a Principal Lecturer.

I'll address my comments regarding the following:

*examine whether the expertise, governance arrangements, record-keeping, performance measures, and policies and guidelines supporting contract management by various Commonwealth entities are fit for purpose to ensure project delivery.*

### **Expertise**

As the AMEP is legislated to deliver English to migrants and refugees newly arrived to Australia, they are best taken care of by the Department of Home Affairs DOHA because they have the expertise and knowledge to support these clients. The current contract was set up while the AMEP was under the auspices of the DET and DEWR. Consequently, it was framed similarly to SEE which didn't take into consideration that clients newly arrived are not yet familiar with Australian systems and practices. Clients didn't receive information about the AMEP with their visa grant letter and didn't know how to access the AMEP which meant they missed out on many services provided to support new arrivals.

### **Governance Arrangements**

Contract managers with DOHA are effective in liaising with AMEP providers to ensure quality program delivery. We have consistent communication in terms of contract management meetings, service provider meetings and regular service provider communiques.

DET were looking at the AMEP as if it was the LLNP (now SEE program), this was demonstrated in the requirement to assess progress every 200 hours with the Australian Core Skills Framework ASCF with no consideration of the AMEP curriculum assessments. No other training package is required to assess the Learning Outcomes and then against the ACSF, why should the AMEP curriculum be considered different?

### **Record keeping**

AMEP Reporting Management System ARMS is a 20<sup>th</sup> century software that is not designed for the current record keeping requirements of the 21<sup>st</sup> Century. We were promised a new reporting system at the beginning of the current contract in 2017 and are still working with multiple systems that don't communicate with each other which take a of lecturer time that would be better used in creating lesson materials.

ARMS reporting functions have been removed requiring a lot of time and research and a reversion to paper-based files until 2020 when COVID meant many changes were undertaken quickly to facilitate work from home arrangements.

Contractual obligations where we are obliged to keep information outside of ARMS has opened the door to duplication and error. A lot of QA time is spent verifying files in paper version with the data retained by ARMS. If ARMS had been updated much of this time would no longer be required allowing lecturers to have more time to create targeted Australian content for our clients. In 2017,

lecturers needed records in ARMS, attendance in the local student information system and paper student folders to file student ACSF progress assessments.

There was an increase in the volume of administration work which led to increased stress for lecturers and a number of lecturers leaving the profession or becoming disenchanted and treating the AMEP as a workplace where one did the minimum for payment.

The administration had an additional burden to create and upload supplementary data reports to the secure file transfer system (Gov Teams) to provide the necessary data to meet the contractual requirements.

No system was provided to calculate 200 hours for classes with continual enrolment.

### **Performance Measures**

KPI 1 – 90% of clients completing initial assessments commence in the program including referral to DL

The onus was placed on the provider to get adult students with competing settlement needs into classrooms before more pressing issues such as housing and healthcare were dealt with.

KPI 2 - 80 % clients attain 1 ACSF indicator after 200 hours of tuition

Demonstrating language improvement meant assessing every 200 hours against the ACSF and the curriculum. This led to increased stress for lecturers in terms of assessment load with students choosing to leave the program due to the pressure of continual assessment when they wanted to learn English in a safe, relaxed, friendly environment that supported and encouraged them, not constantly tested them.

Inconsistent curriculums across the country meant that Recognition of Prior Learning RPL was not easily achievable for students moving interstate.

Outcome based payments meant that we weren't paid for a long time for evening and part time students which resulted in cashflow issues and pushed AMEP providers to the brink of collapse.

KPI 3 - 95% of data is recorded and reported in a form required by the commonwealth within required timeframes.

There was an increase in the volume of administration work which led to high levels of stress for lecturers.

This included calculating 200 hours in an environment of continuous enrolment, students moving between part time and full-time classes and students being transferred to different campuses and students withdrawing from class to attend to settlement needs for short periods of time.

This KPI is on hold due to not being fit for purpose when introduced by the Dept of Education.

KPI 4 - 80% client outcomes are accurate against the ACSF

Use of the ACSF was new for all our lecturers and led to additional stress as it was created for native speaker Australians and not students with little or no literacy and very low levels of English. New sections of the ACSF for Pre-level 1 had to be created.

This KPI is on hold due to not being fit for purpose when introduced by the Dept of Education.

The continued file verification process creates additional pressures for our counselling, administrative, and lecturing staff. Having to prove time and time again that we have systems in place to support education and enrolment takes valuable resources away from other areas of focus.

We welcome the discussions had with Dept of Home Affairs to look at models of delivery, areas for improvement and open consultation to ensure the AMEP remains a valuable social justice program that allows newly arrived migrants and refugees to meet their learning, employment and settlement goals.

### **Policies and Guidelines**

We applauded the government policy during COVID to provide continued language learning opportunities for longer term migrants and refugees.

We welcome the acknowledgment that for many students 510 hours do not meet the additional language tuition required to meet vocational needs. Uncapped hours have allowed students to access further learning that takes into account their trauma and difficulty in learning.

Virtual participation has enabled students to remain connected during the pandemic, as well as provided options for delivery when students can't physically come to class.

We would appreciate KPI's that recognised the lecturer's pastoral care, often supporting mental health wellbeing, and the social benefits the AMEP provides highly vulnerable students to enable them to settle successfully and contribute to the success of Australian multiculturalism.