



**Australian Council of TESOL Associations**

**Opening Statement to the Joint Committee of Public Accounts and Audit  
Inquiry into the Contract Management Frameworks Operated by Commonwealth Entities**

**Public Hearing**

**Wednesday 4 December 2024**

Thank you. Re my authority to speak on these matters, please see my bio on p. 46 of the ACTA submission.

In this statement, I'll address:

1. the Inquiry's purpose: examining whether AMEP contract management is fit for purpose
2. questions the Committee asked in the 13<sup>th</sup> November hearing
3. three crucial questions that Deputy Auditor-General Mellor asked at the end of that hearing – regarding the relationship between policy intent, procurement approach and whether this approach and its administration actually drive performance.

I've timed myself and I have to apologise because, at last count, this statement took 18 minutes. But I think this might be the most efficient way to deal with the concerns from the previous hearing.

**1. Re management of the AMEP contract**

The key point is that the 2017-2021 AMEP contract *itself* was not fit for purpose.

The Department of Education & Training, who wrote the contract, lacked the expertise and had no commitment to (or interest in) the AMEP's policy intent, namely: to deliver English language teaching to adult migrants as a key component in their successful settlement in Australia.

The contract's sole purpose was *bureaucratic*: to re-align the AMEP with the Department's Skills for Education & Employment Program, the SEE Program.

The Department also had no grasp of what this re-alignment entailed. There was nothing in place, even to meet the Department's own misguided policy goals. Defective and missing arrangements for governance, record-keeping and measuring performance caused chaos, and brought the Program close to collapse – with student walk-outs, mass teacher refusal and resignations, worthless KPI data, and criticism from outside bodies.

The evidence supporting this claim is in the ACTA submission, especially the footnotes, the 8 Exhibits in the attachment to that submission, and the other submissions on the AMEP to this Inquiry.

In 2019, the AMEP moved back to the Immigration portfolio within Home Affairs. The AMEP team attempted to mitigate the chaos and then the impact of the pandemic. The Auditor's criticisms are

unfair in failing to clarify that Home Affairs was engaged in cleaning up a mess and finding a way forward.

This task was confused and complicated by the 2021 draft Business Model. Its centrepiece was paying providers for learning outcomes. Home Affairs was exemplary in consulting with stakeholders who – through submissions, forums and other responses – were, as far as we can tell, universally critical of this Model, which was abandoned after Labor took office.

Generally speaking, ACTA has faith that the current AMEP team in Home Affairs is committed to the Program’s policy intent *and* has the necessary administrative expertise. But the fundamental issues raised by Deputy Auditor-General Mellor have not been resolved. I’ll return to that shortly.

## 2. Questions asked by the Committee on 13<sup>th</sup> November.

The Committee asked why the KPIs were not implemented.

Senator Reynolds focussed particularly on why the English gains KPI was dropped. Measuring English gains is both possible and desirable. *Meaningful* measurements require, firstly, **a measurement tool that’s fit for purpose** and, secondly, that the measurements are **not tainted by perverse incentives**.

### Re fit for purpose:

Prior to 2017, the AMEP had a common curriculum that included an assessment system. This system was used to measure and report on learner English gains. It had some problems (that I can explain) but worked reasonably well.

The 2017 contract allowed providers to *choose* a curriculum. Different curricula meant that curriculum-based reporting varied. So the contract mandated a second *common* reporting framework, which was how the AMEP was aligned with the SEE Program. Assessment requirements therefore doubled: *once* as required by the provider’s choice of accredited curriculum and *again* using the common framework required by the Education Department.

Please see section 4.5 in the ACTA submission for why we believe that the Education Department made these decisions, disregarding evidence and “value for money”.

The IT for reports from curriculum and the common assessments never eventuated. Instead, 1000s of spreadsheets were used to record data and then re-enter it for different purposes, e.g. QA file audits and reporting to the Department.

The common assessment framework was not fit for purpose. It was designed for native English speakers. It had no actual infrastructure of tasks/tests, so for at least a year teachers needed to design their own. Its requirements were complex, time-consuming and punitive (I can explain why if you would like -- e.g. teachers had to *transcribe* 5 minutes of spoken English – one minute of speech requires one hour to transcribe; if a required word was missing, the answer had to be marked wrong). The QA provider had a clear conflict of interest, being at once the file *auditor*, the assessment framework *developer*, and responsible for *training teachers* in using it. Their expertise in teaching English to migrants was questionable (and questioned).

Assessments were required for every 200 hours of tuition. Because AMEP students are admitted to classes on a continuous basis, assessments had to be *individualised*. Providers were paid according to student attendance, which had to be recorded every 15 minutes. To maximize class sizes, students were frequently placed in classes irrespective of their English level. (This will remain a problem in the new contract.) Diverse English levels multiplied assessments even more. Classes consisted of non-stop assessments, teaching to the test and checking rolls. That’s why students walked out.

The submissions to this Inquiry detail the horror followed. Here’s just one description (from Submission 7, p.3):

*I have been an education manager for nearly 20 years, and I have never seen a work group so stressed, exhausted and despairing to the extent that some would sit sobbing at their desks and others would be found crying loudly in the stairwells.*

When Home Affairs took over, they returned to the pre-2017 procedure of providers just reporting gains in the curriculum. The QA provider was tasked to align the different assessments against the common framework – it would be interesting to know what that cost.

The four KPIs (participation, attainment, timeliness, accuracy) all hinged, in one way or another, on the common English language assessments. The resulting data was invalid, unreliable and impossible to deliver. That’s why the KPIs were abandoned.

### **The English gain data was also worthless because it was tainted.**

Assessing a provider’s performance on the basis of students’ English gains is different from assessing whether contractors have built a submarine that works. It’s pretty clear if the submarine doesn’t, because it’s still around (or at the bottom of the sea).

However, when a student passes an English test, the student disappears. Whether or not their English “works” is unverifiable.

Competitive tendering for AMEP services has casualised the teaching force, so teachers are permanently in fear of losing their jobs. Achieving KPIs looms large in their thinking.

Here’s how an English attainment KPI actually functions (described in Submission 1 to this Inquiry):

*Teachers were ... encouraged to “pass” the student and “assist” them in the assessment in order to move them up the scale ... simply to achieve KPIs, even though the student was not yet competent. The result was that sometimes students were elevated to the next level which was far too difficult for them. ... It is ... demoralising and frustrating for students if they are placed in a level that is far too high. It is also hard for the teacher and unfair on the rest of the class.*

Plenty more (and worse) examples are in the footnotes in the ACTA submission. These footnotes also demonstrate how it was (and is) impossible for file verifications to determine the accuracy of assessments.

Data on English gains in the AMEP should be meticulously recorded and analysed. Benchmarks should be developed for different cohorts that reflect the factors that impact English gains (notably, age, previous education, class attendance, effects of torture & trauma etc).

To be valid and reliable, these data must be 100% disconnected from KPIs that incentivise employers to pressure teachers and that threaten their employment. That is, discovering whether and how the AMEP delivers English gains requires valid and reliable research methods that exclude perverse incentives.

### **3. Deputy Auditor-General Mellor asked the Committee to consider three questions.**

#### ***1. Do the KPIs actually take you to the policy intent of the program?***

Because KPIs change from one contract to the next, we cannot measure the AMEP’s performance over time.

The five KPIs in the current RFT reflect the AMEP’s policy intent (participation, learning outcomes, pathway guidance, data timeliness and service quality). As always, the devil is in the detail.

The feasibility and the quality of KPI data will depend on adequate staffing and data management technology.

The **participation** and **learning outcomes** KPIs are susceptible to the perverse incentives I've just described. Participation data are important but tying participation to a KPI incentivises providers to enrol students who are not ready to start classes. New arrivals are liable to relocate and may be re-interviewed by another provider. The participation KPI promotes inefficiency, duplication and evaluates providers for behaviours over which they have no control.

The new measure for **learning outcomes** sets a low bar that's probably achievable, except with students who (for various reasons) cannot attend full-time – this runs counter to the aim of offering flexible provision. Necessarily framed as a bare minimum, this KPI will reveal very little about the English gains the AMEP delivers.

The fifth KPI will be developed as **Standards** by the incoming QA provider. In 2009, the then-QA provider developed AMEP-specific Standards that the 2015 AMEP Review said were “beneficial”. *I'll table these*. They were abandoned in the 2017 contract. Mr Mitchell asked if it's possible to assess one provider against another. Our Recommendation 18 for a Standards-based approach allows such comparisons – based on detailed but holistic evaluations of performance in relation to the AMEP's policy goals. ACTA has long advocated for this approach. *I'll table how we see this working*.

Depending on details, complying with the new KPIs may be time-consuming, focussed on trivia and expensive. Since acceptance of the auditor's recommendations, at least one provider now has two full-time positions devoted solely to compliance. Exhibit 6 in the Attachment to the ACTA submission provides examples of dysfunctional and time-wasting compliance activities.

In short, the KPI system does little to further the AMEP's policy goals and is likely to undermine substantive performance.

## **2. Are you measuring whether or not the procurement mechanism is delivering the AMEP's policy intent?**

The answer is no.

The procurement approach has never been independently or comprehensively evaluated.

The closest was in a 2001 Auditor's report, which found no significant cost savings with the switch to competitive contracting.

Competitive contracting, “commercial-in-confidence” and self-interest disallow independent and in-depth scrutiny of how contracts are awarded and function. The hearing on 13 November showed just how the current system blocks access to the truth of what actually happens in the AMEP.

ACTA proposes that the new AMEP contracts should be independently monitored, right from how they are awarded and throughout their life, including the effectiveness and efficiency of the new KPIs and the forthcoming Standards. A starting point is our Recommendation 15 for an independent advisory committee.

Senator Reynolds asked about “barriers to entry” for potentially new providers. Investigation would show that providers without expertise and experience fail. The Committee also needs to know that the pool of qualified (much less experienced) teachers is limited, ageing and drastically shrinking – partly due to what's happened since 2017 and partly because schools' policy has decimated teacher training in this space. When providers lose contracts, the new providers re-hire the teachers who've lost their jobs. The only changes are that experienced teachers retire, casualisation increases, qualifications requirements are weakened, wages and conditions worsen, and excellent programs disappear: for an example, see ACTA Exhibit 8. The 2021 AMEP Review produced data showing that participation drops significantly when providers change. Stability, not changing providers, supports the AMEP's policy intent.

**3. Is the procurement approach, contract administration and how we're driving performance in the contracts actually leading to the policy outcome?**

The procurement mechanism in the 2017 contract, managed by a bureaucratic hierarchy, deflected the AMEP from its policy intent, embedded conflicts of interest, disregarded value for money and destroyed program quality. It is a textbook demonstration of how to drive performance and a Program right off the rails.

Competitive contracting is supposed to promote efficiency, effectiveness and accountability. Administered by a bureaucratic hierarchy, it *stifles* performance in the AMEP, because it undermines student participation and engagement, long-term planning, employing well-qualified and committed teachers, continuous improvement, innovation and the free exchange of ideas. The purchaser-provider divide waives the Department's responsibility for core issues, such as employment conditions, gender equity, and preventing bullying, abuse and mismanagement within a Centre or provider. The insecurity inherent in short-term contracting breeds fear, secrecy and distrust between providers and up and down the management line. Please see ACTA submission section 5 for an elaboration of these points.

In short, the competitively driven and hierarchical system that governs the AMEP is a self-sustaining closed circuit that thwarts real accountability and transparency.

This Inquiry cannot address the wholesale reform of the AMEP that's needed. ACTA Recommendation 11 proposes a further but different inquiry into AMEP contracting, which we hope this Committee will initiate.

Thank you for your patience in allowing me to speak at such length. I look forward to answering your questions.

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# **AMEP Manual**

## **Standards and Criteria for AMEP Providers**

**2009 EDITION**



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## TERMS AND ACRONYMS

Below are some common terms and acronyms used in NEAS' AMEP documentation.

<b>AMEP</b>	Adult Migrant English Program
<b>ARMS</b>	AMEP Reporting and Management System
<b>Centre</b>	A central AMEP delivery location and administrative base of a provider within a contract or region. It usually serves a significant AMEP administrative function, allowing for initial client assessment and placement as well as tuition delivery, and houses an ARMS terminal. There may be more than one Centre within a region.
<b>Community-based Site</b>	A location used for community-based tuition, serviced and supported by a Centre. It may be informal and short-term.
<b>Contact Person</b>	Person with whom NEAS will liaise on day-to-day accreditation and quality monitoring matters, the update of provider information and the scheduling of routine monitoring visits.
<b>Contract</b>	A designated area or function within a state or territory, for which an AMEP service delivery contract has been awarded.
<b>CSWE</b>	<i>Certificate in Spoken and Written English</i>
<b>DIAC</b>	Department of Immigration and Citizenship
<b>DL</b>	Distance Learning
<b>ELICOS</b>	English Language Intensive Courses for Overseas Students
<b>ELT</b>	English Language Teaching
<b>ESL</b>	English as a Second Language
<b>HTS</b>	Home Tutor Scheme
<b>ISLPR</b>	International Second Language Proficiency Rating
<b>NAP</b>	NEAS Assessment Panel
<b>NEAS</b>	National ELT Accreditation Scheme
<b>Principal Administrator</b>	Person with overall responsibility for the program, usually the person identified as the Service Provider's Contract Authority. NEAS will send formal notification of the result of visits for accreditation and ongoing quality monitoring to this person.
<b>Provider</b>	The contractor for delivery of AMEP services. A consortium made up of a prime contractor and consortium partner(s) may constitute a provider. Refer to examples of provider structure below.
<b>TESOL</b>	Teaching English to Speakers of Other Languages
<b>Venue</b>	A formal long-term teaching location serviced and supported by a Centre. It usually includes a staffroom and storeroom for resources, and may sometimes serve a minor administrative function.



## INTRODUCTION

The Adult Migrant English Program (AMEP) provides English as a second language (ESL) tuition to eligible migrants and humanitarian entrants to assist them to settle successfully in Australia. The program is funded and administered by the Australian Government through the Department of Immigration and Citizenship (DIAC).

This *AMEP Manual* explains NEAS' role as the accreditation and quality assurance body within the program. Standards and criteria for accreditation are provided along with an explanation of the quality monitoring process.

## ABOUT NEAS

The National ELT Accreditation Scheme (NEAS) is a self-funding, non-profit, industry-based body operating independently of government and of industry ELT centres, but with strong cooperative links with government agencies and industry representative bodies.

NEAS was incorporated in 1990. Since its inception, NEAS has been recognised nationally and internationally as a leader in the accreditation and quality assurance of ELT centres in both the private and public sectors. It has been providing ELT accreditation services since its inception to ELT centres offering courses to international students within both public and private universities, vocational education and training colleges, secondary schools and private stand alone ELT centres. NEAS operates with the same set of standards and criteria and applies the same operating principles to all ELT centres.

The broad aim of NEAS is to establish and uphold high standards of service provision in English Language Teaching to the benefit of the industry as a whole and especially for students.

In 1997, the Department of Immigration and Citizenship (DIAC) engaged NEAS' services to develop and implement an accreditation and quality monitoring system within the AMEP. In the selection process for the new round of contracts NEAS was successful in winning a contract to provide quality assurance of AMEP service delivery from 2003 to 2008.

## NEAS' ROLE IN THE ADULT MIGRANT ENGLISH PROGRAM

Through accreditation and ongoing quality monitoring, NEAS aims to ensure that a high standard of service delivery continues to be met and improved upon. The purpose of NEAS' quality assurance processes is to ensure that the facilities, resources and processes through which the AMEP is delivered by each provider are maintained at an appropriate standard, so that AMEP clients can be assured of a useful and positive learning experience while participating in the program.

NEAS' role is to monitor inputs and processes. NEAS does not monitor outcomes; these are directly monitored by DIAC through statistical data made available via the AMEP Reporting and Management System (ARMS).

Accreditation and ongoing quality monitoring ensure that only providers offering high standards of English instruction and administrative practice continue to be authorised providers within the AMEP.

**Note: NEAS' AMEP accreditation does not extend to activities outside the AMEP.**

The granting and maintenance of accreditation are subject to an annual a desk audit of submitted information and documentation, as well as an annual on-site assessment of the provider.



Once accredited, AMEP providers are entitled to make use of the "AMEP Accredited" logo in their marketing and promotional material. The logo is an indication that the provider has met NEAS standards and is committed to upholding them. The logo and guidelines for its use are made available when accreditation is granted.

## THE AMEP STANDARDS

The development of AMEP standards involves consultation and trialling with providers and TESOL professionals as well as regular review. The standards may be changed in response to developments in the field and after consultation with stakeholders.

The standards below are the result of a review conducted in 2009 which took into account feedback from AMEP providers, DIAC and international practice in ELT accreditation.

Figure 1: Summary of Standards

### Premises

The learning environment is safe, accessible and educationally and culturally appropriate to the needs of AMEP clients.

### Professional and Administrative Staff

Staff are appropriately qualified and/or experienced in relation to their role and provided with professional guidance, support and development.

### Educational Resources

Educational resources are maintained, relevant to the curriculum and needs of clients and teachers.

### Program Delivery

Program delivery is appropriate to the needs of clients.

### Support Services

Clients are provided with appropriate information and services which support the achievement of their educational, vocational and settlement goals.


### Program Evaluation

The provider ensures high standards of quality in the delivery of learning activities and client support services through regular review.

### Program Promotion

The provider regularly promotes the AMEP to improve client reach.

Each standard focuses on a specific area of service delivery. Providers are required to comply with all standards in order to gain and maintain NEAS accreditation.

To assist providers in addressing the standards and criteria, explanatory notes and a list of documentary evidence which may be required are given at the end of each section. Click on the  to view the notes relating to the relevant criterion.

## ACCREDITATION AND REVIEW

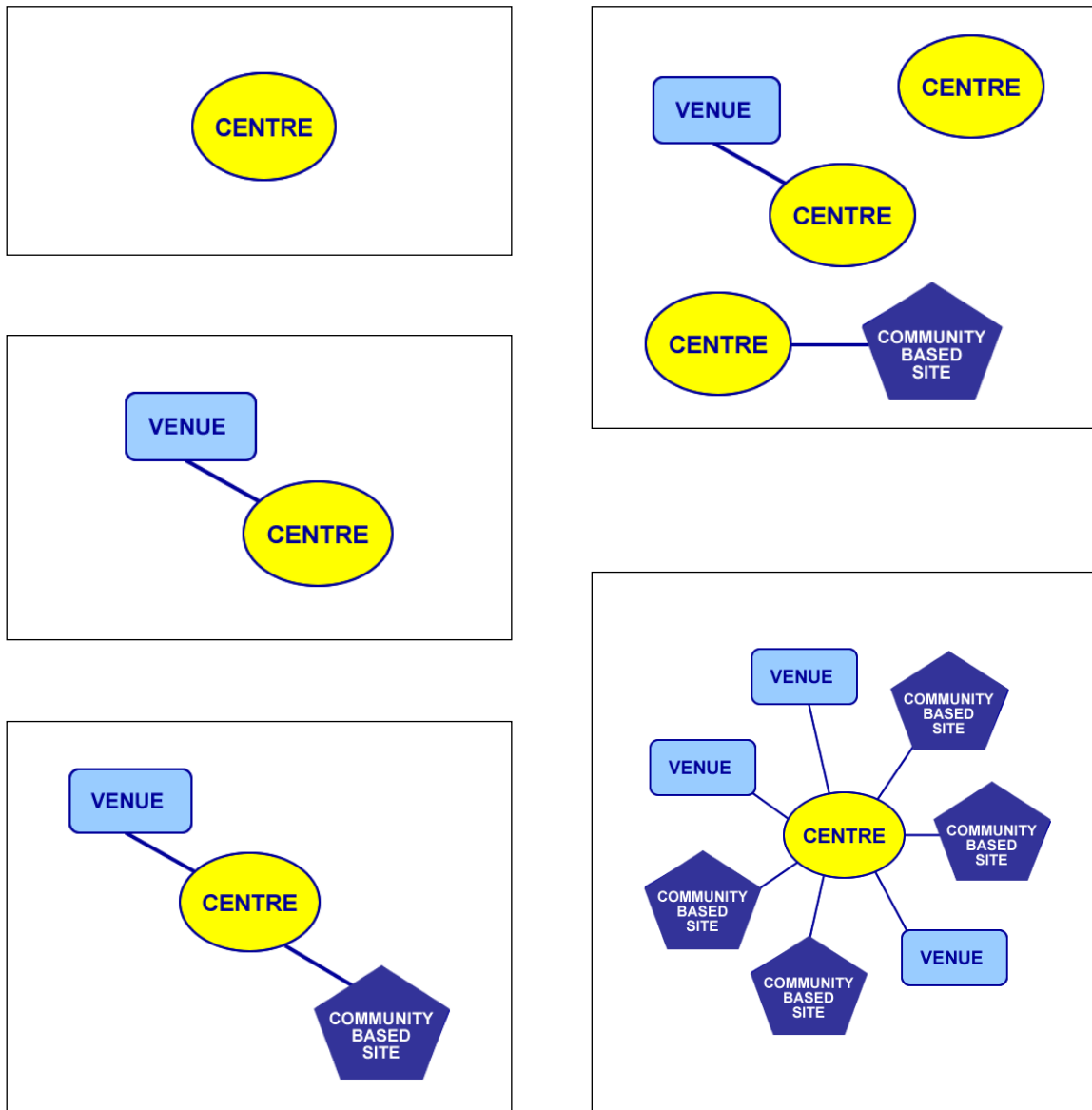
### Provider details

NEAS asks providers to make available information relating to organisational structure, delivery locations, staffing and program services. When information and documentation are complete, NEAS arranges an on-site assessment of the provider for initial accreditation.

Prior to each round of on-site assessments, NEAS asks providers to complete an [Annual Return](#) of organisational information. Providers are required to keep NEAS advised of any changes to this information. Notification of changes to information contained in the annual return may be made at any time by advising NEAS in writing.

Provider structures may vary. The diagrams below illustrate some possible structures of a provider. One or more centres may exist within a region. A [centre](#) may also exist without an attached [venue](#) or [community-based site](#). Various combinations of the examples illustrated below may also exist within a region or contract.

**Figure 2: Examples of provider structure**



## **On-site assessments**

On-site assessments are conducted annually. An external assessment is made against each standard and the applicable criteria. The criteria also serve as a guide to providers for internal quality control purposes.

The on-site assessment is conducted by up to two members of the [NEAS Assessment Panel](#). The first on-site assessment is for initial accreditation. Subsequent assessments are annual reviews to confirm the provider's ongoing compliance with standards and criteria.

Each provider's [structure](#) and context for delivery of AMEP services is different, and there may be isolated instances where certain standards do not necessarily apply. This will be taken into account during on-site assessments.

Delivery locations to be assessed depend on the structure and nature of the provider. Where applicable NEAS will arrange on-site assessments of more than one provider location. Arrangements to assess specific locations are made in consultation with the provider's nominated [Contact Person](#).

Each on-site assessment includes:

- viewing of facilities and resources
- discussion with on-site management personnel
- viewing of relevant documents (refer to notes in the standards and criteria section)

Discussion during the on-site assessment is principally with the nominated manager at each delivery location. Managers may invite other personnel to participate in the discussion where they feel that these personnel are better placed to contribute information. However, NEAS will not normally discuss accreditation matters with consultants external to the provider.

The following matters do not normally constitute part of the assessment:

- outcomes-related matters that are monitored directly by DIAC (eg, key performance indicators included in providers' contracts with DIAC)
- observation of learning activities
- financial information
- results of student exit assessments
- strategic planning

In addition, panellists do not normally talk to groups of students or teachers, except at the invitation or with the agreement of management, students or teachers.

## **NEAS Assessment Panel**

NEAS has in place a panel of experienced ELT professionals who conduct on-site assessments on its behalf. Panellists are specifically briefed and trained by NEAS on their role in the accreditation system. They are engaged as needed by NEAS under a contract of confidentiality and provide a written report to NEAS on each on-site assessment.

Appointed panellists are provided with the organisational information supplied by the provider. Documents are destroyed or returned to NEAS at the conclusion of the quality monitoring process.

Panellists are bound by a contract of confidentiality precluding them from disclosing information or material relating to the NEAS on-site assessment. Under the terms of their contract with NEAS, panellists are obliged to decline an engagement if there is a likelihood of a conflict of interest arising in the course of their duties as panellists. Providers are advised which members of the panel have been appointed and may request a substitute, subject to providing a valid reason.

## Accreditation decisions

Following each on-site assessment, appointed panellists submit a written report to NEAS.

At the initial accreditation stage, NEAS makes one of the following decisions and communicates it formally to the provider's nominated [Principal Administrator](#):

- grant accreditation
- defer accreditation, pending another on-site assessment and report
- refuse accreditation

If accreditation is deferred or refused, the provider is advised of the reasons for deferral or refusal.

At the annual review stage, NEAS makes one of the following decisions and communicates it formally to the provider's Principal Administrator:

- maintain the provider's accredited status
- maintain the provider's accredited status, at the same time identifying aspects of the provider's service delivery where improvements could be effected and making recommendations accordingly
- suspend the provider's accredited status, pending another on-site assessment and report
- withdraw the provider's accredited status.

If accreditation is maintained with recommendations, suspended or withdrawn, the provider is advised of the recommendations or reasons for suspension or withdrawal.

DIAC is also advised of all decisions following assessments for initial accreditation and annual reviews.

The diagrams on the following page provide a summary of the process for initial accreditation and annual review.

Figure 3: Accreditation process

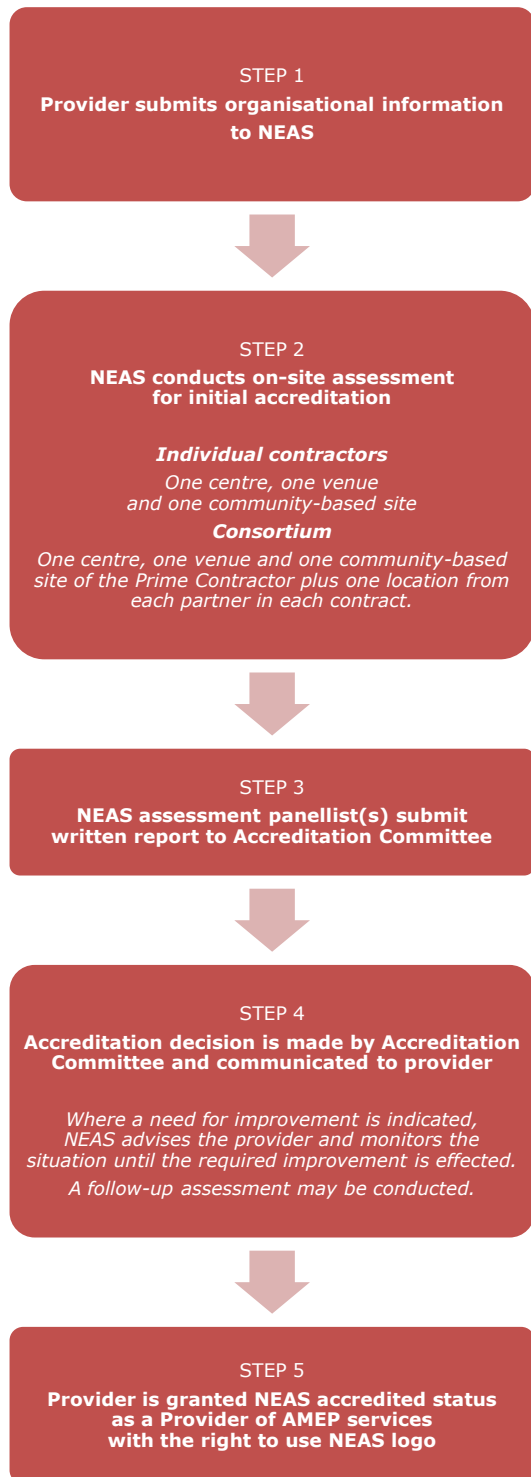
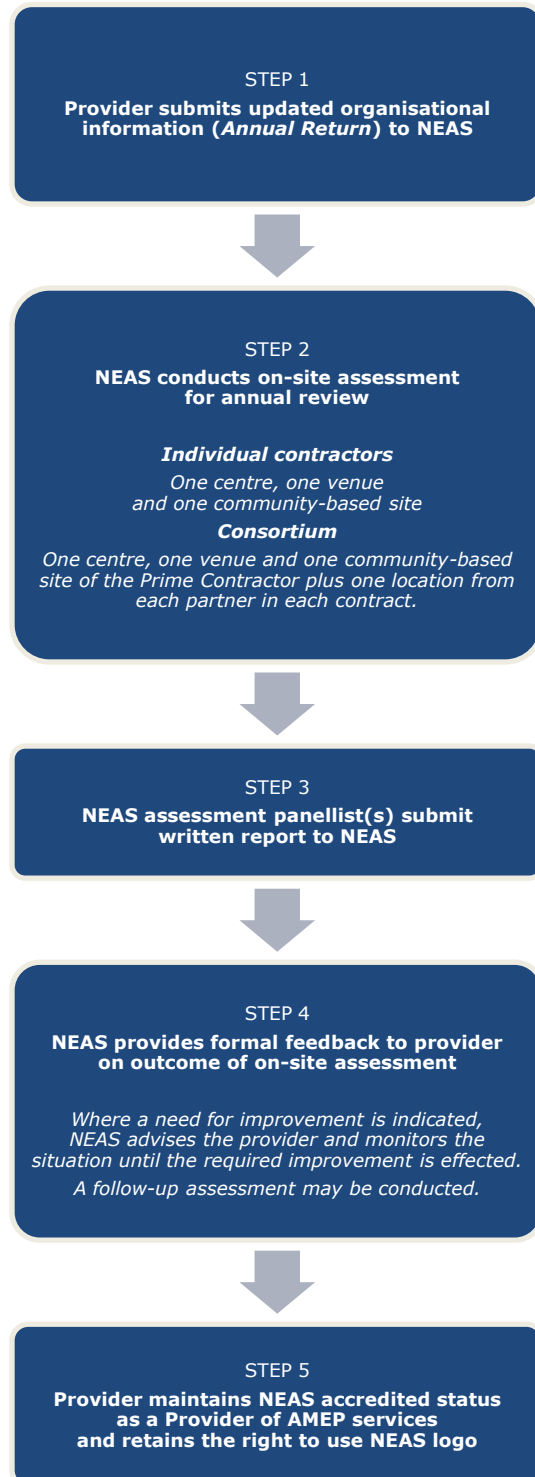



Figure 4: Annual review process



# AMEP STANDARDS AND CRITERIA

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Following each section of the standards are explanatory notes and a list of documentary evidence which may be required in assessing compliance. Click on  in each case for details.

## Section A

# PREMISES

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### Standard

The learning environment is safe, accessible and educationally and culturally appropriate to the needs of AMEP clients.

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### Criteria

- 1. The premises meet the needs of clients in terms of their location and cultural and physical environment.**
  - 1.1 The location is accessible by public transport when classes are being held.
  - 1.2 The premises are culturally acceptable to the clients using them. ➔
  
- 2. The premises have enough areas adequate in size and suitable in layout for the learning activities and support services allocated to these areas.**
  - 2.1 The areas designated for learning activities are adequate in size for the number of occupants and sufficient in number for the needs of the location. ➔
  - 2.2 The areas designated for administrative and support activities are adequate in size for the number of occupants and sufficient in number to meet the needs of clients. ➔
  
- 3. Premises are safe, clean and well maintained.**
  - 3.1 The buildings where learning activities take place meet the pertinent legislative standards. ➔
  
- 4. Equipment, furniture and fittings are sufficient, suitable for their purpose and maintained in good condition.**
  - 4.1 Classroom furniture and fittings are suitable for language learning and teaching. ➔
  - 4.2 The teachers' staffroom is adequately furnished and equipped. ➔
  - 4.3 Administrative areas are adequately furnished and equipped. ➔
  - 4.4 Counselling offices contain at least one desk/table and two chairs per office.
  - 4.5 The common area for clients is appropriately furnished and equipped. ➔
  - 4.6 Educational equipment is sufficient for the number of learners and classes and suitable for the types of learning activity. ➔
  - 4.7 There is a procedure for maintaining educational equipment, furniture and fittings in sound working order.



## NOTES AND EVIDENCE

### SECTION A: PREMISES

NOTES	EVIDENCE
<p>1.2 The premises should be clearly signposted, for example with an easily identified logo or graphic, or with information in community languages identifying the premises.</p> <p>The areas accessed by clients should be free of culturally inappropriate signs, notices or material.</p>	
<p>2.1 Classroom sizes at centres and venues should comply with the requirements of the <a href="#">Building Code of Australia</a>. Centres and venues should include:</p> <ul style="list-style-type: none"> <li>▪ one or more staffrooms for teachers</li> <li>▪ an area which can be used for staff meetings</li> <li>▪ facilities for storage and safekeeping of equipment and consumables</li> </ul>	
<p>2.2 Centres and venues should include at least one confidential counselling room or office per full-time counsellor at the location, and an adequate dedicated common area for clients. Centres should include an appropriate space/room for initial client assessment and an appropriate space/room for reception, administrative and management staff.</p>	<ul style="list-style-type: none"> <li>▪ Local government approval for designated use of centres and venues</li> </ul>
<p>3.1 Centres and venues meet local government regulations for usage, number of occupants, fire safety and disabled access.</p> <p>The areas where tuition takes place should be light, well ventilated and free of noise interference.</p>	
<p>4.1 Each classroom should include at least:</p> <ul style="list-style-type: none"> <li>▪ one whiteboard/chalkboard per classroom; community-based sites may use a suitable alternative (eg flip-board)</li> <li>▪ one chair and desk or similar per enrolled learner using the room at any one time</li> <li>▪ one teacher’s chair and desk or table</li> <li>▪ one power point</li> </ul>	
<p>4.2 Staffrooms should include:</p> <ul style="list-style-type: none"> <li>▪ one chair and workspace per effective full-time teacher</li> <li>▪ one lockable drawer, locker or cupboard per teacher</li> <li>▪ materials storage space (shelving, cupboards, filing cabinets, etc)</li> </ul> <p>Teachers should have access to computers for the purposes of lesson preparation and administration.</p>	
<p>4.3 Administrative areas should include:</p> <ul style="list-style-type: none"> <li>▪ one chair and desk per staff member</li> <li>▪ one lockable drawer, locker or cupboard per staff member.</li> <li>▪ adequate storage space (shelving, cupboards, filing cabinets, etc) for all files, records, materials and consumables</li> </ul> <p>Administrative staff should have access to computers as required.</p>	
<p>4.5 The common area should include tables, chairs or benches, noticeboards and posters or pictures. If the area is used for assembly, there should be stackable chairs.</p>	
<p>4.6 There should be sufficient computers and audio-visual equipment to allow access by all groups. Online access is available.</p> <p>Access to a range of educational technology appropriate to language teaching and learning should be available on the premises. At centre level, educational technology might include sufficient audio-visual equipment for use by all groups, as well as for individual use or self-access. Adequate computers, printers and copying facilities should also be available.</p>	

## Section B

# PROFESSIONAL AND ADMINISTRATIVE STAFF

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### Standard

Staff are appropriately qualified and/or experienced in relation to their role and provided with professional guidance, support and development.

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### Criteria

- 5. All staff are appropriately qualified and/or experienced.**
  - 5.1 All staff are culturally sensitive in their dealings with clients. ➔
  - 5.2 Teachers are qualified in accordance with the licensing requirements of the *Certificates in Spoken and Written English*. ➔
  - 5.3 Language proficiency assessors have specific training in the instruments and methods used for language proficiency assessment. ➔
  - 5.4 Teachers have specific training in using a curriculum framework as a basis for course design. ➔
  - 5.5 Teachers who teach Distance Learning clients have specific training in the AMEP Distance Learning Program.
  - 5.6 Teachers have undertaken professional development and training in identifying and meeting the needs of survivors of torture and trauma.
  - 5.7 Educational counsellors are professionally trained and/or experienced. ➔
  
- 6. All staff have access to and undertake appropriate professional development.**
  - 6.1 There are procedures for the induction and guidance of new staff.
  - 6.2 Providers have an up-to-date professional development plan for AMEP staff. ➔
  - 6.3 All staff are systematically informed of changes in the AMEP or migration program which have an impact on their work. ➔
  - 6.4 Teachers are encouraged to take advantage of professional development opportunities provided to them. ➔
  - 6.5 Professional development guidance is available to teachers.
  
- 7. Staffing structures make provision for the coordination and supervision of learning activities and assessment.**
  - 7.1 There is one overall curriculum coordinator. ➔
  - 7.2 One or more persons have responsibility for the coordination of learning activities and assessment at a delivery site. ➔

## NOTES AND EVIDENCE

### SECTION B: PROFESSIONAL AND ADMINISTRATIVE STAFF

NOTES	EVIDENCE
<p>5.1 Successful experience in working with clients of culturally diverse backgrounds and awareness of the migrant experience should be included as criteria in staff selection.</p> <p>5.2 Teachers are required to hold qualifications as specified in the <a href="#">licensing conditions of the Certificate in Spoken and Written English</a>. These are:</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>the Certificate IV in Training and Assessment (TAA04) or equivalent, or be able to demonstrate equivalent competencies</p> </div> <p>PLUS EITHER</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>a <b>recognised Bachelor Degree</b> - 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</p> </div> <p>AND</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>a <b>recognised postgraduate TESOL qualification</b> resulting from a course of study in which course content of no less than 100 contact hours (or distance learning equivalent) covers the grammar of the English language, language learning and TESOL methodology and includes a practicum</p> </div> <p>OR</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>A <b>Bachelor of Education with a TESOL major</b> or equivalent which includes a practicum</p> </div> <p>The practicum must be at least 60 hours which includes, for example, supervised teaching, observation, field visits, resources evaluation, team teaching, 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 a practicum should be kept.</p> <p>Teachers holding qualifications from overseas institutions should show a statement of equivalence from <a href="#">AEI-NOOSR</a>.</p> <p>The detailed information necessary for assessing qualifications and/or experience can normally be found in course transcripts or statements of service from previous employers.</p>	<ul style="list-style-type: none"> <li>▪ Staff selection criteria</li> <li>▪ Staff CVs</li> </ul>
<p>5.3 Assessors should have undergone training in using and administering the <a href="#">International Second Language Proficiency Rating</a> (ISLPR) scale.</p> <p>5.4 Teachers should have undergone training in using the <i>Certificate in Spoken and Written English</i> curriculum framework as part of their induction and through ongoing professional development.</p> <p>5.7 Counsellors may be known by a variety of titles (eg 'Pathways Adviser', 'Student Services Officer', etc), but are those responsible for providing advice to clients on their educational or vocational needs. Educational counsellors should have experience in providing advice on educational/vocational pathways to clients from culturally diverse backgrounds, or have undertaken training in counselling.</p>	<ul style="list-style-type: none"> <li>▪ Counsellor CVs</li> </ul>
<p>6.2 The provider should facilitate the ongoing professional development of teaching staff to ensure teachers are kept up-to-date with current theory, knowledge and practice.</p>	<ul style="list-style-type: none"> <li>▪ Professional development program for twelve months to come</li> </ul>

NOTES	EVIDENCE
<p>The professional development plan for AMEP staff may include:</p> <ul style="list-style-type: none"> <li>▪ regular seminars or workshops conducted in-house or in conjunction with another provider, each one focusing on an area of interest, eg methodology, materials, activities, ideas and insights gained from professional reading</li> <li>▪ assistance with attendance at relevant conferences</li> <li>▪ encouragement to pursue further qualifications</li> <li>▪ up-to-date teacher references, including journals, which are readily accessible to teachers</li> <li>▪ policy and procedures for the induction of new teachers</li> <li>▪ annual assessment moderation as required under CSWE licensing</li> <li>▪ the design and evaluation of assessment tasks, at both local and national levels.</li> </ul>	
<p>6.3 One or more identified persons are responsible for providing professional development consultation and guidance to staff.</p>	
<p>6.4 New staff undertake a structured induction program and are provided with ongoing guidance. Information for new staff is contained in a teacher’s manual or equivalent document.</p>	<ul style="list-style-type: none"> <li>▪ Staff induction handbook or equivalent</li> </ul>
<p>7.1 One identified person has responsibility for overseeing course content development and planning. This person should be appropriately qualified (cf. 5.1) and experienced.</p>	
<p>7.2 Coordination of learning activities and assessment may include allocating teachers to learning groups, ensuring that teaching programs are consistent with the agreed syllabus, and overseeing the work of teachers at the delivery site.</p>	<ul style="list-style-type: none"> <li>▪ Completed teaching programs and records</li> </ul>
<p>Teaching programs are clearly documented, and a record of what has been taught is kept for each class/learning group.</p>	

## Section C

# EDUCATIONAL RESOURCES

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### Standard

Educational resources are maintained, relevant to the curriculum and needs of clients and teachers.

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### Criteria

- 8. Educational resources are consistent with contemporary TESOL theory and practice, are maintained in adequate supply and are regularly updated.**
  - 8.1 Educational resources are sufficient in quantity and variety to suit the needs of clients and teachers. ➔
  - 8.2 Provision is made for reviewing, replenishing and updating the stock of materials. ➔
  
- 9. Teachers have access to adequate and appropriate reference resources.**
  - 9.1 Reference resources in a variety of media reflecting contemporary TESOL theory and practice are available in adequate supply. ➔
  - 9.2 Teachers are advised of the availability of reference resources for their own professional development. ➔

## NOTES AND EVIDENCE

### SECTION C: EDUCATIONAL RESOURCES

NOTES	EVIDENCE
<p>8.1 Educational resources include print, audio, video, computer, online and teacher developed materials. Independent learning resources are organised for ease of access.</p> <p>At centre or venue level, educational resources could include:</p> <ul style="list-style-type: none"><li>▪ course books and/or other printed materials</li><li>▪ pre-recorded audio and video resources</li><li>▪ reference books, journals or other publications for teachers, online and/or printed</li><li>▪ self-access materials for students</li><li>▪ computer software, where relevant</li></ul> <p>8.2 It is recommended that:</p> <ul style="list-style-type: none"><li>▪ an identified person be given responsibility for coordination of resources</li><li>▪ an inventory of materials be maintained and regularly updated</li><li>▪ a plan be put in place for development of resources, with established criteria for selecting, purchasing and reviewing resources.</li></ul>	<ul style="list-style-type: none"><li>▪ Inventory of educational resources</li></ul>
<p>9.1 It is recommended that an identified person be given responsibility for maintaining and updating reference resources.</p>	<ul style="list-style-type: none"><li>▪ Inventory of teacher reference materials</li></ul>
<p>9.2 There should be a procedure in place for advising teachers of the availability of reference resources as appropriate, and for familiarising them with items relevant to the courses they are currently teaching.</p>	

## Section D

# PROGRAM DELIVERY

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### Standard

Program delivery is appropriate to the needs of clients.

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### Criteria

#### 10. Learning activities are offered at places, times and intensities to reflect the diversity of client need.

- 10.1 Clients have a choice of learning activities of differing intensities with minimum waiting periods. ↻
- 10.2 Community-based learning activities are scheduled to meet the needs of clients unable to attend centres or venues for personal, family, cultural or religious reasons. ↻

#### 11. Clients applying for AMEP provision are assessed and placed appropriately.

- 11.1 Clients are assigned to a learning activity appropriate to their level, needs and predicted learning pace. ↻
- 11.2 Clients are advised promptly of assessment outcomes. ↻
- 11.3 Procedures are in place for addressing inappropriate client placement. ↻
- 11.4 Providers develop and maintain an individual learning plan for each enrolled client. ↻
- 11.5 Distance Learning staff maintain links with other AMEP providers for the purposes of referral of Distance Learning clients.
- 11.6 Applicants assessed as ineligible for AMEP tuition receive advice on other educational options. ↻

#### 12. Clients are oriented to the facilities and their rights and obligations as learners, and are consulted on choice of course content and learning progress.

- 12.1 Clients are provided with an appropriate program of orientation to their learning, including information on their rights and obligations as AMEP clients. ↻

#### 13. Teaching programs are planned and tailored to the needs of clients.

- 13.1 Programs are designed for each group of clients, taking into account the profile of the client group and individual and group needs. ↻
- 13.2 Learning group sizes are based on current best practice in TESOL and take into account the client profile and the type of learning activity. ↻

#### 14. Client attendance and learning progress are monitored.

- 14.1 Records of individual client learning progress are kept. ↻
- 14.2 Clients receive regular and timely feedback on their work and progress. ↻

14.3 Up-to-date records are kept of client attendance at all learning activities in which they are enrolled. ➤

14.4 There are procedures for ensuring no learning group is left without a teacher. ➤

**15. Course content is subject to ongoing development and review.**

15.1 Systematic records of what has been taught are maintained. ➤

15.2 Course content is regularly reviewed and modified as needed. ➤

15.3 Assessment of learning outcomes is regularly moderated to ensure reliability and validity.



## NOTES AND EVIDENCE

### SECTION D: PROGRAM DELIVERY

NOTES	EVIDENCE
<p>10.1 Learning activities should be offered in full-time and part-time modes throughout the year, with Distance Learning available as a choice to all clients.</p> <p>Clients should be offered the opportunity to commence an appropriate formal learning activity within one month of registering with the provider, or three months if they have a childcare entitlement.</p>	<ul style="list-style-type: none"> <li>▪ Timetable of learning activities</li> </ul>
<p>10.2 Where a provider offers community-based learning activities, these should be conducted close to childcare facilities, and childcare should be made available to clients.</p> <p>Depending on demand and practicability, the provider should also offer single sex classes, evening classes and/or weekend classes.</p>	
<p>11.1 Placement of clients into learning activities should be by assessment against the ISLPR in all macroskills. The provider should place clients into homogenous groups, for example by assessed level, learning focus, etc., and should refer clients to the Distance Learning program where appropriate.</p>	
<p>11.2 Clients should receive written notification of their assessed level, with a clear explanation of what this means.</p>	
<p>11.3 Teachers, administrators and other staff should be aware of steps to be followed in order to resolve any inappropriate client placement.</p>	
<p>11.4 DIAC requires that providers develop and maintain an individual learning plan for each enrolled client. Individual learning plans should be prepared in a way that is easily understood by clients, and should include:</p> <ul style="list-style-type: none"> <li>▪ the client's ISLPR levels as assessed at enrolment</li> <li>▪ the client's identified learning and/or vocational goals</li> <li>▪ an agreed learning or vocational pathway.</li> </ul> <p>The individual learning plan should be developed in consultation with the client and its content agreed to by both the client and the provider. The plan should be reviewed every six months in consultation with the client or revised as needed at the request of clients.</p>	<ul style="list-style-type: none"> <li>▪ Sample client individual learning plans</li> </ul>
<p>11.6 The provider should maintain up-to-date information on educational options outside the AMEP to which applicants ineligible for the AMEP may be referred.</p>	
<p>12.1 Clients should receive an 'orientation pack', or equivalent, which includes:</p> <ul style="list-style-type: none"> <li>▪ a timetable for the course</li> <li>▪ information about the centre's facilities and services</li> <li>▪ information about their role and obligations as learners within the AMEP, as well as the organisation's obligations towards them</li> </ul> <p>Orientation information should be reinforced throughout the client's learning where appropriate.</p>	<ul style="list-style-type: none"> <li>▪ Client orientation pack or equivalent</li> </ul>
<p>13.1 Teachers should consult clients on course objectives and content (eg through a needs analysis process) when planning programs.</p>	
<p>13.2 An up-to-date syllabus should be maintained, documented in sufficient detail and organised to facilitate access by teachers.</p>	<ul style="list-style-type: none"> <li>▪ Syllabus documents including specially tailored programs where used</li> </ul>
<p>14.1 The provider should have a system noting the progress of each enrolled learner in the group. The system could be electronic or manual, but up-to-date records should be kept and should be easily accessible.</p>	

NOTES	EVIDENCE
14.2 Teachers should provide feedback – oral and written – to clients throughout their tuition, ensuring that any assessment results are clearly explained.	
14.3 Class rolls should be checked by teachers for all sessions and consolidated at least weekly.	▪ Client attendance records
14.4 Teachers should be aware of procedures to be followed in case of absence. The provider should maintain an up-to-date list of current relief teachers.	▪ List of casual/relief teachers
15.1 Teachers should complete lesson records in an agreed format. Records should be stored centrally and be easily accessible.	▪ Completed lesson records
15.2 There should be a process in place for teachers and/or coordinators to review each course at course end. Records of course reviews should be kept. External (cross-provider) CSWE moderation should be undertaken at least annually, and teachers kept informed of the results of assessment moderation.	▪ Records of recent CSWE moderation activities

## Section E

# SUPPORT SERVICES

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### Standard

Clients are provided with appropriate information and services which support the achievement of their educational, vocational and settlement goals.

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### Criteria

**16. Prospective clients are provided with accurate pre-course information about the provision of AMEP services in the region.**

- 16.1 Pre-course information is available in a form that is easy for clients to understand. ➔
- 16.2 Pre-course information is comprehensive and accurate. ➔

**17. Clients have access to appropriate educational, vocational and welfare counselling services.**

- 17.1 Clients are made aware of the availability of educational and/or vocational counselling and how to access it. ➔
- 17.2 Provision is made for clients with special needs. ➔
- 17.3 Counsellors refer clients with welfare needs to appropriate agencies. ➔
- 17.4 Appropriate counselling is provided to clients not meeting attendance obligations. ➔
- 17.5 Procedures exist for following up clients who withdraw from the program before completing their entitlement. ➔

**18. The provider has clear and equitable procedures for addressing client complaints and appeals.**

- 18.1 Clients are made aware of the complaints and appeals procedures. ➔
- 18.2 Procedures are easy for clients to understand and can be implemented by clients independently of the provider. ➔
- 18.3 Procedures include clear informal and formal steps for clients to follow. ➔

**19. Childcare provision is appropriate to the needs of clients.**

- 19.1 Childcare providers meet relevant state/territory regulations. ➔
- 19.2 Childcare locations are convenient to AMEP delivery locations or clients' homes. ➔
- 19.3 Childcare provision is respectful of the backgrounds and cultural sensitivities of clients and children. ➔

**20. The provider has effective strategies for maximising client access to the Home Tutor Scheme.**

- 20.1 Home Tutor Scheme management maintains links with other AMEP locations. ➔
- 20.2 The Home Tutor Scheme is effectively promoted for the recruitment of clients and tutors. ➔
- 20.3 Procedures are in place for assessing the suitability of applicant tutors. ➔
- 20.4 Procedures are in place for appropriately matching clients with tutors. ➔
- 20.5 Tutors are provided with initial and ongoing training. ➔

## NOTES AND EVIDENCE

### SECTION E: SUPPORT SERVICES

NOTES	EVIDENCE
<p>16.1 Pre-course information should be presented in simple language and translated into community languages where appropriate and practicable.</p>	
<p>16.2 One or more identified persons are responsible for checking the content and accuracy of pre-course information.</p>	<ul style="list-style-type: none"> <li>▪ Pre-course information as made available to clients</li> </ul>
<p>17.1 Clients should have access to advice on study/learning pathways. Educational/vocational counselling information should be included in client orientation and reinforced throughout the course.</p> <p>Counsellors' offices should be clearly marked.</p>	
<p>17.2 Clients with special needs include survivors of torture and trauma and clients with learning difficulties. Tailored programs should be provided where appropriate and practicable to suit the needs of such clients.</p> <p>The provider maintains links with relevant organisations and agencies (eg Translating and Interpreter Services, Torture and Trauma Survivors Associations, etc).</p>	
<p>17.3 Up-to-date contact details of welfare agencies in the region should be kept for the purposes of referral and follow-up of clients.</p>	<ul style="list-style-type: none"> <li>▪ List of relevant welfare/other agencies</li> </ul>
<p>17.4 All clients should be routinely informed of attendance obligations during orientation and throughout the course. Teachers and counsellors should be familiar with procedures for providing early notification to the administration of clients not meeting attendance obligations and for contacting and counselling such clients – these could include identified steps for referral from teachers to counsellors, backed up by a systematic check of class rolls.</p>	
<p>17.5 It is recommended that one or more identified persons be given specific responsibility for coordinating the follow-up of clients.</p>	
<p>18.1 Complaints and appeals procedures should be clearly displayed on the premises (eg in classrooms and common areas). Information on procedures should be provided to clients at orientation.</p>	
<p>18.2 Complaints and appeals procedures should be made known to clients in a way that can be readily understood by them. This includes advising clients of the contact details of an appropriate body, external to the AMEP provider, to which they may refer in the case of unresolved matters.</p> <p>If a matter cannot be resolved through the provider's processes, the provider should refer the matter to DIAC.</p>	<ul style="list-style-type: none"> <li>▪ Complaints and appeals procedures as made available to clients</li> </ul>
<p>18.3 Complaints and appeals procedures should be framed as a series of steps, expressed in plain English and supported by graphics. Where appropriate and practicable they should be translated into community languages.</p> <p>Procedures should include contact details of an appropriate body external to the provider, to which clients may refer, and should state the person(s) to address as the first step towards the identification and resolution of complaints and appeals.</p>	
<p>19.1 It is recommended that one or more identified persons be given responsibility for ensuring that childcare providers meet relevant state/territory regulations.</p>	<ul style="list-style-type: none"> <li>▪ List of childcare provider locations</li> <li>▪ Evidence that childcare providers meet state/territory regulations</li> </ul>

NOTES	EVIDENCE
<p>19.2 The travel time between the childcare facility and the tuition delivery location or the client’s home should not exceed thirty minutes each way.</p>	
<p>19.3 Childcare managers and staff should be kept up-to-date about the intercultural issues affecting childcare provision, through professional development, liaison with relevant organisations, etc.</p>	
<p>20.1 Home Tutor Scheme management should maintain regular contact with relevant counselling and referral staff in other AMEP locations.</p>	
<p>20.2 Proactive approaches should be made to community organisations in order to:</p> <ul style="list-style-type: none"> <li>(i) promote the Home Tutor Scheme, and</li> <li>(ii) support the provision of informal ESL tuition through the Home Tutor Scheme Enhancement Program.</li> </ul> <p>This could include regular advertising (eg, for tutor recruitment) in local and community media.</p>	<ul style="list-style-type: none"> <li>▪ Recent advertisements for the Home Tutor Scheme</li> </ul>
<p>20.3 The provider should have a system in place for obtaining a profile of applicant tutors and for matching clients with tutors, taking into account location, mobility, age, language and ethnicity, gender, religion, etc.</p> <p>20.4 Distance Learning clients should be matched and placed with a volunteer tutor where suitable and practicable.</p>	<ul style="list-style-type: none"> <li>▪ List of Distance Learning clients indicating those placed with a volunteer tutor</li> </ul>
<p>20.5 Volunteer tutors should undergo an initial training program of at least 15 hours’ duration and be provided with ongoing support and/or training following their appointment. It is recommended that initial training be nationally accredited.</p>	<ul style="list-style-type: none"> <li>▪ Home Tutor Scheme training program and tutor training records</li> </ul>

## Section F

# PROGRAM EVALUATION

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### Standard

The provider ensures high standards of quality in the delivery of learning activities and client support services through regular review.

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### Criteria

**21. The provider has procedures for evaluating the effectiveness of its learning activities.**

21.1 Evaluation is undertaken at provider level for each program offered. ➔

21.2 Evaluation takes into account input from clients, teachers and the community. ➔

**22. The provider has procedures for evaluating the effectiveness of its client support services.**

22.1 Evaluation of client support services offered is undertaken at provider level. ➔

22.2 Evaluation takes into account input from clients, teachers and the community. ➔

**NOTES AND EVIDENCE**

**SECTION F: PROGRAM EVALUATION**

NOTES	EVIDENCE
<p>21.1 The provider should have mechanisms in place for program evaluation, eg a committee established to advise management on program evaluation or to act as a review and decision-making body. In evaluating program service delivery, the provider should take into account reports from within the organisation and external to the organisation, eg reports on the effectiveness of childcare, HTS, counselling.</p> <p>21.2 Feedback from clients should be sought regularly and taken into account and                      22.1 in program planning and evaluation, eg through end-of-course surveys and/or questionnaires completed by clients.</p> <p>Input from teachers can be sought through a variety of means, eg end-of-course reports, staff meetings, program band meetings, staff appraisals, etc.</p> <p>The provider should maintain active links with the community and where practicable and appropriate seek feedback about AMEP service delivery. For example, there could be regular meetings with relevant organisations (records of meetings should be kept), guest speakers from the community, involvement in cultural/community events, etc.</p>	<ul style="list-style-type: none"> <li>▪ Organisational chart indicating the person/body responsible for overall program evaluation</li> <li>▪ Sample client satisfaction surveys</li> <li>▪ Sample teacher surveys or reports</li> <li>▪ Records of recent meetings with community groups</li> </ul>



## Section G

# PROGRAM PROMOTION

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### Standard

The provider regularly promotes the AMEP to improve client reach.

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### Criteria

#### **23. The provider's promotional activities are planned and targeted.**

- 23.1 A variety of media and methods are used for promotion, appropriate to the target communities. ➔
- 23.2 There are procedures for regular liaison with relevant organisations and agencies. ➔

#### **24. Promotional activities are subject to ongoing review.**

- 24.1 Promotional activities are subject to ongoing evaluation of their effectiveness in reaching the target groups and increasing client numbers. ➔
- 24.2 Promotional information is accurate and unambiguous. ➔

## NOTES AND EVIDENCE

### SECTION G: PROGRAM PROMOTION

NOTES	EVIDENCE
23.1 Promotional methods may include advertising in local and community media, press releases, open days, cultural events, bulk mail-outs of information, etc.	
23.2 Regular contact is maintained with DIAC and other organisations and agencies relevant to the AMEP. This could be through contract management meetings with DIAC, formal scheduled meetings with government and non-government organisations in the region/community, etc.	<ul style="list-style-type: none"><li>▪ Records of recent contact with relevant organisations and agencies</li></ul>
24.1 The effectiveness of promotional activities should be formally monitored, eg through tracking the sources of client referrals to the provider.	
24.2 It is recommended that one or more identified persons be given specific responsibility for checking all promotional material for accuracy and clarity before release.	<ul style="list-style-type: none"><li>▪ Recent promotional materials for the provider's AMEP activities</li></ul>



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## **Standards-Based Quality Assurance: the ACTA proposal**

The following five outcomes are largely under the control of those who administer and deliver the Program. Performance against these outcomes can be validly and reliably measured. These measurements can be used to evaluate providers' and the Government's delivery of the Program.

### ***1. Adult migrant English language learners' participation in the AMEP***

Participation can be measured over time and evaluated in relation to evidence-based benchmarks for various learner cohorts, taking account of key external variables, notably (un/)employment rates.

### ***2. AMEP students' English language gains***

English gains can be measured, tracked and evaluated against evidence-based benchmarks for various cohorts, taking account of entry levels (including age and previous education) and the time spent in the Program.

### ***3. AMEP student satisfaction***

Students' can be asked to evaluate their AMEP experience in relation to program quality, their personal goals and the overall national goals served by the AMEP. These evaluations can be consistently and routinely documented through a simple, well-designed and appropriately administered process, measured and tracked over time, and used to develop evidence-based benchmarks. They do not need to be expensive and could be administered in class.

### ***4. AMEP provider quality***

Individual provider quality can be assessed according to recognised standards for English language programs for adult migrants. Comprehensive AMEP standards were developed, published and used under previous contracts (NEAS, 2009). To measure provider quality, reports on providers' performance in relation to standards can be mapped onto an A–E scale.

### ***5. The evidence base that supports AMEP policies, practices and evaluations***

The AMEP should be supported by a robust evidence base that:

- provides benchmarks for Outcomes 1 – 4 above
- independently researches and documents the AMEP's contribution to national goals
- creates knowledge and feedback loops for continuous improvement.

See Table 1 on the next page.

**Table 1: How AMEP outcomes can be operationalised and measured**

<i>Outcomes</i>	<i>What should be measured?</i>	<i>What would count as success?</i>
<b>1. Participation</b>	The number of adult migrant English language learners (i.e., those with less than “vocational English”) <b>who participate in the AMEP.</b>	Achieving or exceeding <b>evidence-based benchmarks for enrolments and retention rates</b> based on (1) long-term AMEP data on enrolments & retentions, (2) benchmarks established for Outcome 2, <sup>1</sup> and (3) extrinsic factors, notably labour market data. See Outcome 5.
<b>2. English language gains</b>	<p><b>1) English entry &amp; exit levels</b> of those who enrol and stay in the AMEP for at least, say, five weeks.</p> <p><b>2) Learner achievement of competencies in the AMEP curriculum</b> (viz. the <i>EAL Framework</i>).</p>	Achieving or exceeding <b>evidence-based benchmarks for learner gains</b> in the national AMEP curriculum for different learner cohorts in relation to (1) their English entry levels (2) previous education (3) age (4) experience of torture & trauma, (5) mother tongue/first language, and other recognised factors that impact on language learning. See Outcome 5.
<b>3. Student satisfaction</b>	<b>AMEP student responses</b> to validly and consistently designed and administered survey questions about their AMEP experience in relation to national goals, personal confidence & quality of teaching.	<b>High satisfaction levels</b> in relation to personal confidence, AMEP quality and its contribution to national goals. See Outcome 5.
<b>4. Program quality</b>	<b>Assessment of each provider’s performance on an A–E rating scale</b> against a comprehensive, relevant and agreed set of program standards, for example, the NEAS 2009 <i>AMEP Manual Standards and Criteria for AMEP Providers</i> . <sup>2</sup>	Providers performing at <b>A or B level according to independent assessments of performance against these standards</b> by experts in program delivery, including teaching English to adult speakers of other languages.
<b>5. A robust and credible evidence base that supports the AMEP overall and Outcomes 1-4 in particular.</b>	<p>The overall research base would not be measurable in any meaningful way, but specific research questions will include measurements that should be clearly valid and reliable.</p> <p>Measures of Outcomes 1–4 will be valid and reliable <i>if and only if</i> benchmarks are based on a <b>robust evidence base</b>.</p>	<p>The evidence base meets the following criteria:</p> <p><b>Sound evidence supports the benchmarks</b> for Outcomes 1-4 and are consistently applied from one contract to the next.</p> <p>In-depth independent research:</p> <ul style="list-style-type: none"> <li>• shows how learners’ AMEP experience <b>promotes the national goals</b> served by the AMEP</li> <li>• pursues both <b>specific and more general questions</b> about the AMEP, its existing and potential students, and the Program’s contribution to national goals.</li> </ul> <p>The evidence base supporting the AMEP is <b>transparent and accessible</b> to examination in the public domain.</p>

<sup>1</sup> That is, retention benchmarks will vary according to the factors that determine rate and level of progress, which, in turn, relate to previous English proficiency and level of schooling.

<sup>2</sup> The NEAS AMEP Standards were developed following a recommendation from the Auditor General in 2001. They provide detailed specifications for the following 7 Standards: Premises, Professional & Administrative Staff, Educational Resources, Program Delivery, Support Services, Program Evaluation and Program Promotion.