

Please withhold my name. I would welcome publication of my submission on the inquiry website.

In relation to the *Parliamentary Inquiry into the Administration of the Adult Migrant English Program contracts* and the *Inquiry into the Contract Management frameworks operated by Commonwealth entities*, I wish to comment on my direct experiences as an employee of a TAFE Service Provider delivering the AMEP at the beginning of the 2017 contract.

I welcome the opportunity to provide feedback about how the implementation of the 2017 AMEP contract directly impacted and altered my professional enthusiasm, and how my trust in the AMEP and teaching energy levels were devastated.

I started working in the AMEP as an Hourly Paid Instructor (HPI) in 2005. I have a passion for this program and the positive impact it has on newly arrived adult migrants and refugees. I progressed from HPI to Lecturer, Team Coordinator to Principal Lecturer and now am joint Educational Manager of the program.

I have provided detailed feedback to the Department of Home Affairs on multiple issues such as the *Reform of the Adult Migrant English Program – Discussion Paper in 2021, referencing an outcomes-based model, new information management system, distance learning, Community and work-based learning, national curriculum, student counselling and pathway guidance, Volunteer Tutor Scheme, and performance management framework.*

I wish to describe the stress the early mismanagement of the 2017 contract caused to me personally as a member of a senior leadership team, as well as that to the workgroup of AMEP lecturers whom I supported. Additionally, I will explain how morale and effort was at exhaustion level to the detriment of the students but more importantly, how lessons can be learnt from this, and problems rectified in the new contract due in 2026.

I will provide examples of the considerable issues in record keeping and assessment requirements at the commencement of the contract in 2017/2018, how these detracted from the key essence of teaching English and describe how Key Performance Indicators punished and perverted the intention of the program. I will compare the management of two bodies: Department of Education and Training (DET) and (the current) Department of Home Affairs (DoHA). Finally, I will reflect on the policy and guidelines that have worked for and against AMEP students who are the most vulnerable of people.

Recording keeping at the start of the contract in 2017/2018 was extremely stressful and time consuming on multiple levels. As Principal Lecturer and part of the Senior Leadership team, three main issues directly impacted me. These were the increased pressure in supporting a large teaching team with a new system to track student hourly attendance, the cumbersome Australian Core Skills Framework (ACSF) Progressive Assessments of student attainment, and the difficulties in using the data management system (ARMS) for student management and reports.

1. The Department of Education and Training (DET) directive to record class start and finish times and student attendance in 15-minute blocks created confusion and frustration as follows.
 - Limited (if any) instructions and support were provided by Department at roll out; the lack of provision of a national system to facilitate this change was perplexing.
 - The requirement to note arrival / departure time to the 15-minute mark, for every student continually disrupted classroom learning activities and resulted in student and teacher dissatisfaction.
 - Considerable internal training and support was required for our large teaching team to learn the coding required to enter attendance accurately on an internal system; this was very stressful.
 - Error reports run by Administration due to incorrect input by lecturers that required my follow up, coaching and guidance was time consuming.
 - Increased data entry time impacting lecturers in completing attendance tracking frustrated the workgroup who complained to me and management.
 - Attendance tracking was duplicated because lecturers tracked attendance on the Student Information System (SIS) and then Admin support staff duplicated the same attendance onto ARMS; this increased the potential for error.

2. ACSF Progressive Assessments every 200 hours were time consuming and detracted from our teaching.
 - Limited (if any) instruction and support was provided by the Department (DET) prior to implementation of this ACSF framework.
 - Using the ACSF was frustrating because it was/is not relevant to English language learners.
 - The requirement to assess individual students every 200 hours, irrespective of their commencement date, was disruptive to educational and adult learning classroom activities.
 - There was no provision by the Department of any mechanism to calculate when students reached 200 hours of attendance; the result was horrendous.
 - I personally spent months - involving whole weekends (every Saturday and Sunday) of my unpaid hours, calculating student and class attendance hours to email out to lecturers on Monday morning.
 - Teachers and our program were terrified that when we were audited, if there were missing 200-hour ACSF assessments, this would reflect badly on our program, institution and jeopardise our ongoing contract, and therefore our jobs. This pressure was relentless.
 - Immense record keeping was required to justify and report 'testing' students every 200 hours against the ACSF.
 - Enormous paper-based record keeping impacted Educational and Administrative staff, as RTO Records Management Policies to meet ASQA compliance and the AMEP assessment practices required hard copy assessments and records to be kept each enrolment period. Teachers were exhausted and frustrated because of the excessive workload and made errors.
 - As Principal Lecturer and part of the Senior Leadership team at this time, I had to design and implement a new process with paper folders to record and store ACSF assessments that would 'travel' with the student as they progressed through their learning journey. Without support or direction from the Department or the File Verifiers, this was extremely time consuming to initiate and demotivated me personally along with many lecturers.
 - Students disliked over-assessment and stopped attending class. In addition to our educational concerns, this was financially problematic. ACSF and curriculum (CSWE) requirements meant that there was little time to develop competence and to practise skills in any breadth and depth. Students did not like this and voiced their opposition, causing stress and anxiety for classroom lecturers who had to 'toe the line'. This was anti-educational and was "busy work" that no-one appreciated except the File Verifiers.
 - File Verifiers / Auditors informed us that we should 'change our practice' to meet the ACSF Progressive Assessment needs and this was disheartening. That is, they wanted us to disregard our expertise and professional experience in delivering positive TESOL language learning activities to meet a framework that merely ticked boxes.
3. Use of ARMS for reporting and Student Management
 - Key ARMS reporting functions were removed with little notice, requiring extra time and effort to collect student data to assist class planning and departmental reporting.
 - ARMS could not attendance track students at time intervals of 15 minutes, and this was a new requirement - therefore data was duplicated, increasing the chance for error and reducing time lecturers had to create relevant and interesting lesson content. This affected the morale of teachers and the Leadership Team in trying to support and guide the workgroup.
 - Lecturers were frustrated and unable to run reports in user friendly formats to meet the needs of classroom management and learning pathways for client/student.
 - The Administration team was required to create and upload supplementary data sheets via the Secure File Transfer to GovTeams, as ARMS did not capture all the information that was required by the Department, adding to workload and interfering with support of the educational program.

- Limited capacity to store information relating to ISLPR and ACSF scores and progression made accurate placement and planning of students more difficult for those providing Counselling.

Issues in relation to the Key Performance Indicators at the beginning of the contract caused anxiety as follows.

- **KPI 2 (80% clients attain ACSF indicator after 200 hours)**
 - There was a huge increase in administrative work because our assessment load was doubled.
 - Lecturers struggled to maintain student numbers and class stability as student 'walked out' rather than be assessed.
 - Frustration was caused by the disruption of the ACSF assessments to English learning activities, the flow of settlement topics and preparation for curriculum assessments which were separate from ACSF assessments.
 - The stress of being audited and having File Verifications with a punitive focus served the counterproductive objective of 'teaching the test', without developing depth and breadth of competencies across multiple and diverse settlement topics.
- **KPI 4 (80% client outcomes are accurate against the ACSF)**
 - This was stressful because the ACSF was new and we felt unsupported by the Department (DET) or Quality Assurance (Lynda Wise & Associates -LWA).
 - The framework was not 'fit for purpose' in relation to ESL learners; they were often traumatised and on Humanitarian visas; previously we taught holistically across the macro skills of Listening, Speaking Reading and Writing but ACSF prevented this.
 - The pressure on Counsellors to immediately become accurate Assessors was immense.

The current contract manager (in the Department of Home Affairs) is better experienced to understand, communicate, manage and support the settlement needs of new arrivals and share information between multiple settlement agencies / programs. This ensures efficient and effective progression towards functional settlement and language development.

The previous Department (DET) did not readily share information on new arrivals, visa grant information / letters, or refer clients to AMEP programs, because their focus was directing new arrivals to employment related agencies and services. DET aligned the AMEP to the Language, Literacy and Numeracy Program (SEE program) favouring the ACSF framework and Progressive Assessments. They prioritised employment over settlement and learning English.

The Department of Home Affairs (currently):

- convenes monthly individual and quarterly national Settlement Service Provider meetings
- communicates changes and updates with emails at regular and predictable intervals.
- sets up working groups to understand and 'work through' settlement issues
- supported efforts made by providers to continue learning opportunities through COVID
- requests input from providers and the staff 'on the ground'
- responds in a timely manner so that I feel that my concerns are considered

In conclusion, I sincerely hope the next contract and its implementation can learn from the mistakes at commencement of the 2017 contract. That will require communicative Contract Management policies, networks to multiple settlement agencies and attention to the settlement needs of the newly arrived adult migrants. That requires the Immigration portfolio to remain within the Department of Home Affairs. The goals of the AMEP should foster English language learning to assist adult migrants to be confident in settling in Australia and functioning productively socially and economically.

Assessment (within a national curriculum) needs to be consistent and reasonable. It must be understood that Service Providers can only encourage adult learners' attendance and progression. Adult learners must be treated with respect and their priorities recognised in regard to attending AMEP classes and balancing these against other life demands, such as gaining employment and caring responsibilities, which impact on attendance. Progression

and Key Performance Indicators should be related to student satisfaction and excellence in English language delivery, not by achieving passes in random tests.

Quality Assurance and compliance should be supportive and not punitive. Quality English language provision should be the focus, not ticking boxes and 'busy work' that requires Senior Leadership staff to spend time away from supporting and mentoring teaching staff.

The AMEP needs a Client Data Information Management system and support team for transparent and efficient reporting. The development of excellent teaching and learning resources to meet diverse learner needs should be prioritised. The improvements experienced by Service Providers in 2021 should be carried forward because these reflect the functionality and support that are essential to efficient program delivery.

I look forward to continuing to deliver the AMEP and the new contract. The AMEP makes a critical difference to so many lives and benefits the community. I am passionate about and honoured to be part of the AMEP. I hope the Committee finds this description of my experiences useful and that it can make recommendations on how to prevent what can go wrong, as happened in 2017.