

24 November 2020

Committee Secretary
Senate Legal and Constitutional Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Immigration (Education) Amendment (Expanding Access to English Tuition) Bill 2020

To Whom It May Concern

English Australia, the national peak body for the English Language teaching sector in Australia, welcomes the chance to contribute to the consultation on the Immigration (Education) Amendment (Expanding Access to English Tuition) Bill 2020).

We commend the changes introduced by this Bill, which stand to benefit non-English-speaking migrants, the communities in which they live and Australian society and its economy. The changes acknowledge that learning a new language is complex and takes time but doing so has life changing ramifications.

Each amendment is a positive move towards improving access for non-English-speaking migrants and we support these changes. These changes also present a unique opportunity to further refine the Adult Migrant English Program (AMEP) and improve its ability to achieve its aims by:

- supporting an expanded AMEP through quality service delivery
- aligning the definition of 'Vocational English'
- increasing the number of registered AMEP providers.

Supporting an expanded AMEP through quality service delivery

The planned changes aim to improve access to English tuition via the AMEP. The success of these changes would mean a significant increase in the uptake of the Program as more individuals study for longer periods and to higher levels of proficiency. This would necessarily mean an increase in demand for appropriately qualified teachers.

Currently, AMEP provider teaching staff must meet the trainer and assessor requirements set by the Standards for Registered Training Organisations (RTOs) 2015. However, these standards are designed to ensure the quality of providers in the vocational education sector and are of questionable relevance to English language provision, as are the teaching qualifications they require – the TAE40116 or higher. These qualifications do not involve specific training in the skills or knowledge required for English language teaching.

Meanwhile, Australia's ELICOS sector employs a large pool of qualified and experienced English language teachers who are both world-class and rarely hold the qualifications required by the Standards for RTOs 2015. Instead, ELICOS teachers must meet the requirements of the ELICOS Standards 2018 which state:

P6.4 ELICOS teachers must have the following:

- a) a degree or diploma of at least three years full-time or equivalent (teaching or other)*
- b) a suitable TESOL qualification or qualification that contains TESOL as a method*
- c) appropriate TESOL teaching experience or are formally mentored by a senior staff member with this experience.*

English Australia believes these requirements are relevant to the AMEP program and to supporting the learning outcomes that it aims to achieve. Thus, to enable AMEP providers access to a significantly larger pool of potential teaching staff English Australia recommends amending the qualification requirements for AMEP teachers to require that teachers either meet the relevant sections of the Standards for RTOs 2015 or the relevant sections of the ELICOS Standards 2018.

This change would mean AMEP providers are more able to meet the increasing demand for teachers and ensure their teachers are increasingly qualified to support the learning outcomes desired by the Program. At a time when the ELICOS sector has been hit hard by the COVID-19 related border closures, this may provide a valuable employment opportunity for ELICOS teachers who have lost jobs due to the lack of international students in Australia.

Defining 'Vocational English' in clearer terms

English Australia supports raising the AMEP eligibility threshold (and exit point for the program) from functional to 'Vocational English' but would like to better understand what encompasses this term.

The Department of Home Affairs (DHA) currently defines 'Vocational English' on its website as scoring 5.0 in the International English Language Testing System (IELTS).¹ However, guidance provided by DHA on the Bill's proposed changes state that they will:

'raise the AMEP eligibility threshold (and exit point for the program) from functional (IELTS 4.5 or equivalent) to vocational (IELTS 5.5 or equivalent) English'²

¹ <https://immi.homeaffairs.gov.au/help-support/meeting-our-requirements/english-language/vocational-english>

² <https://immi.homeaffairs.gov.au/settling-in-australia/amep/about-the-program/background>

We would ask that the Committee clearly state which benchmark will define 'Vocational English', but would add that shifting from the Functional English level (equivalent to an IELTS 4.5) to the current Vocational English level (equivalent to an IELTS 5.0) may not have the desired impact.

While the shift is a step in the right direction, the difference in proficiency level is so small as to be challenging to reliably identify. Even utilising the rigorous methods of IELTS itself, this difference is often seen as a margin of error. As the assessment systems used by providers within the AMEP system, while fit for purpose, cannot be expected to be as rigorous as IELTS, reliably measuring this level may well be problematic.

An English proficiency level equivalent to IELTS 5.5 is more aligned to the well-chosen name for the new level - Vocational English - as it aligns with the requirement for international students to enter vocational education programmes. Extending the increase further and defining 'Vocational English' as equivalent to IELTS 5.5 is much more likely to better support the intention of the changes.

Increasing the number of registered AMEP providers

English Australia supports removing the time limits on enrolling, commencing and completing AMEP tuition, seeing these changes as increasing opportunities of access for non-English-speaking migrants.

To best support this change and to meet the likely increase in demand for AMEP, we believe that expanding the number of AMEP providers will ensure the success of the changes.

Australia's ELICOS sector has considerable expertise in the delivery of English language programs and would welcome the opportunity to support the Government's aims of driving better settlement outcomes for refugees and migrants with a focus on employment, English language acquisition and community integration.

As well as the benefits for non-English-speaking migrants, increasing the number of registered AMEP providers would strongly support a sector that has been hit hard by the COVID-19 pandemic. Being wholly reliant on international arrivals, the ELICOS sector would welcome an expanded AMEP that would allow many small businesses to trade out of a challenging situation without the need for further government support.

Once again, English Australia welcomes the opportunity to give feedback on this Bill and commends the Minister for the initiative. We look forward to further discussions on the matter in due course.

Sincerely,

Brett Blacker
Chief Executive Officer
English Australia