



Settlement
Council
of Australia

Submission: AMEP Reforms Discussion Paper

Settlement Council of Australia

July 2021

The Settlement Council of Australia acknowledges the traditional custodians of the land on which we operate, the Ngunnawal people. We also acknowledge the traditional custodians on the various lands on which migrants and refugees settle across Australia, and on which our sector operates.

We pay our respects to Elders past, present and emerging and celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to our lands and waters.

About the Settlement Council of Australia

The Settlement Council of Australia (SCoA) is the peak body representing the vast majority of settlement agencies across Australia providing direct services and support to people of migrant and refugee backgrounds.

Our members include organisations large and small, who are committed to the successful settlement of migrants and refugees across the country. Their services range from greeting new arrivals at the airport, through to assisting them to secure housing, learn English, make social connections, access services and find their first job. Australia's settlement services are recognised as being among the best in the world

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About this submission

The Department of Home Affairs is consulting on proposed reforms to the AMEP business model, expected to commence in 2023. Our submission details our response to questions in the [Discussion Paper](#).

Our feedback has been developed through consultations with our members, including AMEP providers and settlement service providers, with the view that the AMEP is an essential component of achieving good settlement outcomes. In our response we consider the need to empower AMEP providers to deliver quality services, as well as to ensure all settlement programs work together to achieve the same end goal of good settlement.

Responses to the Discussion Paper

Q1. Is an outcome payment on attainment of a qualification the most effective way to incentivise student outcomes?

SCoA supports a shift to focus on outcomes in the AMEP, as identified in our *Maximising AMEP and English Language Learning Consultation Report (2020)*. However, feedback from our members, including settlement service providers and AMEP providers, indicates that the outcomes payment model proposed in the discussion paper requires some rebalancing. Moving too drastically towards payment based on outcomes risks disincentivising work with vulnerable cohorts, limiting investment in teaching and supports up front, and reducing the overall quality of the AMEP.

Feedback from our members indicates that a payment system that has a primary focus on outcomes could create an emphasis on the achievement of units and qualifications at the expense of settlement and learning outcomes. This could significantly disadvantage vulnerable students who may take longer to complete their outcomes in the AMEP. For example, women with family and caring responsibilities, people who are experiencing impacts of torture and trauma, ongoing health concerns or older people, will often have additional and intersecting barriers that may prevent them completing AMEP outcomes quickly (Department of Social Services, 2017). This is not to say they are not willing or able to complete their AMEP outcomes, but factors exist which will likely extend the time taken to complete these outcomes. Those who want to access formal AMEP must be able to access it, but if providers are focusing on clients for outcomes for their own viability, they will be incentivised to enrol students who are able to complete outcomes quickly, therefore excluding these groups.

The payment model creates a risk that vulnerable groups will be pushed into the community-based classes. While we support these classes as an option, anyone who is eligible and wants to access formal AMEP training should be able to, and they should not be pushed into a community-based class due to policy settings which are weighted too heavily toward focusing on the attainment of formal qualifications.

SCoA also notes students may leave the AMEP for a reason that may indeed be a positive settlement outcome, such as finding employment, and this may even have been possible due to learning English quickly through the AMEP. However, under the new model, this would not be considered as the completion of an outcome. We are concerned that AMEP providers would be penalised for students achieving a positive settlement outcome which may have been facilitated through engagement with the AMEP.

SCoA believes there needs to be a distinction on shifting the program to achieving outcomes, and making payments primarily outcomes-based. Though the reasoning behind a shift to outcomes is sound, a rethink of the proportion of payments for outcomes is required so as to not disadvantage vulnerable cohorts, or detract from the goal of actually achieving outcomes.

Q2. Is there anything other than prior education levels that can be measured (informed by collected data), which should be considered for a cohort adjustment on outcome payments?

Prior education levels are only one factor that can impact upon an individual's learning journey. As identified above, students in the AMEP are highly diverse and have various experiences that may impact their settlement experience and AMEP learning journey. In particular, humanitarian entrants as a cohort face multiple and intersecting barriers on their settlement journey, including learning English through the AMEP.

SCoA therefore advocates for humanitarian entrants to be automatically subject to a cohort adjustment in the AMEP, given their diverse experiences and greater obstacles to completing outcomes in a short period of time. The Building a New Life in Australia study identifies several factors that may impact humanitarian entrants' English learning, including previous level of literacy in their own language, poor health, caring responsibilities and prior education (Department of Social Services, 2017). Women who are humanitarian entrants were also far more likely to struggle with or postpone their English learning due to caring commitments. Alongside the upheaval associated with experiences of displacement, many humanitarian entrants are contending with psychological impacts of torture and trauma, which has a significant impact on multiple parts of their settlement journey.

Consideration of education alone does not therefore provide a comprehensive picture of the multiple and intersecting impacts on humanitarian entrants. For example, someone who has had many years of education, but has experiences of displacement, torture and trauma, and ongoing health issues, will face a very different learning journey than someone without these experiences (Department of Social Services, BNLA, 2017). Our members have reported this very experience with the recent Syrian cohort, who were highly educated and qualified, but pre-migration experiences and trauma had a significant impact on their learning that could not be encapsulated in current data. Further, research by the Multicultural Youth Advocacy Network has found that young people aged 15-25 can face numerous additional barriers in remaining engaged in their English language education in the AMEP (MYAN, 2020).

Factors other than prior level of education must therefore be considered. Humanitarian entrants must be automatically eligible for a cohort adjustment.

Q3. Is the outcome payment the most suitable point to apply a cohort adjustment?

The cohort adjustment should be provided upfront to providers. The purpose of this payment is to provide additional support to students who need it. Leaving payment until an outcome is achieved does not give providers resources or capacity to provide the necessary support throughout a student's learning. It must be provided as part of the initial payment so that resources can be allocated to vulnerable cohorts to ensure their success in the AMEP.

Q4. Does the relative split of payments outlined in the table above support provider cash flow?

The smaller amount allocated to providers upfront than in previous iterations of the program is untenable for many providers, particularly smaller ones. Providers must invest in their staff, venues and resources, but under this model, only 5 per cent of the payments will be provided upfront to achieve this. Often, students may need to repeat a unit, meaning, for example, that it could take 5 terms for them to achieve an outcome. Not being paid for that long is not viable for providers. SCoA instead advocates for a greater proportion of the payment to be provided

upfront to ensure the quality and continuity of the AMEP. In our consultations, it appeared that 30 to 50 per cent of payment upfront would be more appropriate to ensure students are adequately supported and providers have appropriate cash flow.

Q5. Are there any further considerations with splitting payments under the outcomes-based model as per the table above?

N/A

Q6. What features and functions would you like to see in the new IMS?

N/A

Q7. What risks may be experienced in transitioning to a new system?

N/A

Q8. What tuition options should be implemented in the future AMEP business model to support flexible learning?

SCoA supports flexibility in the future AMEP business model to meet the needs of diverse cohorts. SCoA agrees with the discussion paper that in person classes are highly beneficial. All provisions must therefore be made so that wherever possible, participants can reap the numerous benefits of in person class. This must include supporting vulnerable cohorts who may not take as long to complete their hours. It also means ensuring appropriate, free and accessible childcare options are made available to all participants.

As recognised in the discussion paper, digital learning can be a way to improve access and participation, particularly in situations where physical attendance is not possible. The flexibility that online learning can offer is beneficial, however there is a 'digital divide' between newly arrived migrants and refugees and the rest of Australia, in both access to and use of digital technology (SCoA and Good Things Foundation, 2020). This divide must be addressed in the future business model to continue to support flexible learning. Further, use of technology is also important in non-remote learning settings. SCoA has heard that lots of engagement occurs through platforms such as WhatsApp, but not every student has a phone, and many only have access to devices when physically on campus such as at the library.

One way of addressing the digital divide while promoting flexibility in the AMEP is the provision of digital devices to participants of the AMEP. Devices, such as laptops, could be provided to students upon their enrolment in the AMEP to facilitate their English language learning and digital literacy skills. Providing AMEP participants with sufficient technology to undertake their studies would have the combined effect of improving digital inclusion and increasing the uptake of the AMEP, and therefore support positive settlement outcomes.

Q9. Should Distance Learning continue in its current form or should all service providers be required to deliver tuition flexibly to meet the needs of Distance Learning clients?

Flexibility through Distance Learning is important for those who are not able to attend in person. However, requiring all service providers to provide Distance Learning is not an efficient use of resources, with feedback indicating that Distance Learning requires a distinct skill set and resources, and not all providers are prepared to engage in this.

To ensure students have access to flexibility through Distance Learning and maintain efficiency, SCoA recommends a stand-alone Distance Learning Provider be established, which all AMEP providers can opt to use. Any provider who wishes to provide Distance Learning should also have the option to deliver their own internally developed Distance learning option.

Those who do not have an internally developed option can opt out and refer to the main provider.

Q10. What additional factors should the Department consider to ensure that the needs of clients who are learning remotely are met?

Further clarification is needed on the childcare arrangements for distance learning. It is essential that students engaged in distance learning are able to access childcare if they choose to. It should not be assumed that the reason for distance learning for primary carers is so that they can be present with their children – it may be due to mobility factors, transport difficulties, or being in a rural or remote location.

Q11. Should the community-based learning solely focus on conversational English? Why or why not?

As identified in our joint report *Community English Language Programs: Strengths and Challenges* (FECCA and SCoA, 2019), community-based English classes play an important role for people who are unable to access the AMEP, or who are not focused on attaining formal qualifications or learning more formal English. Community-based learning can provide the benefits of a more comfortable and familiar social environment and has the potential to provide key settlement information and support, often through conversational English. These classes can offer flexibility and learning without a focus on assessment, and may be more accessible for some individuals.

Community-based classes currently vary wildly in form, content and purpose. Some are very informal conversation classes, while others resemble delivery of the AMEP in more familiar and accessible locations, and many fall somewhere along a spectrum in between. They can be delivered by AMEP providers, other settlement service providers, or community organisations outside the settlement sector. The type of class offered depends on the characteristics and goals of the students. For some, the primary outcome sought is social interaction, settlement knowledge, and basic conversational English. For others, they may have ambitions to obtain formal qualifications but are unable to attend formal AMEP classes in a TAFE setting for a variety of reasons.

In our conversations with AMEP providers, there was a clear preference to maintain some basic, but flexible, level of rigour in community-based classes offered through the AMEP. This was seen as important to maintain the identity of the AMEP as a program that delivers high quality English learning tuition. This entails the classes being much more holistic than purely conversation classes. This does not mean there is not a need for conversation classes, however we query whether such classes are primarily intended to achieve an English language outcome, as opposed to being more focused on a range of other settlement goals such as social engagement, and facilitating independence across other settlement outcome areas. It may therefore be more appropriate that the more informal and conversational types of community-based learning classes continue to be delivered and facilitated by other settlement programs and community organisations as is currently the case.

Further, it is critical that the main AMEP offering is flexible enough that students have a material and real choice between engagement in formal AMEP classes or community-based classes. Community-based classes should not become a way to address a lack of flexibility in the program.

Q12. Should non-accredited curriculum be used to deliver the community-based learning stream? Why or why not?

As explored above, community-based learning has the capacity to be beneficial. Feedback from our members has indicated hesitancy around removing all regulation and guidelines around community-based classes aligned with the AMEP, to ensure the objectives of quality

learning experiences are met. Though SCoA has heard that an accredited curriculum is not necessary for the community-based learning stream, it is essential that other key guidelines are implemented to ensure consistency and quality. Such guidelines could include ensuring lessons are taught by qualified teachers with access to appropriate resources.

Q13. What is best practice in determining local labour market needs and developing links with employers?

The proposed work-based learning stream has the capacity to be a great opportunity for providers to innovate and achieve positive outcomes by determining local labour market needs and developing links with employers. However, in order to maximise the benefits of this proposal, flexibility, responsiveness and the provision of funding up front must be integrated into the model.

Feedback from our members indicates that elements of the current SLPET model works well, but narrow requirements can constrain innovation and increase administrative burden. To address this, the bucket of money allocated should instead be provided to providers' budgets on a 'use or lose' basis, where providers are accountable after the fact. This minimises administrative burden and encourages innovation, as many employers won't wait and opportunities need to be taken up as they come. These changes will support providers to determine local needs and develop important links with employers.

Q14. What supports do AMEP teachers need to ensure a smooth transition to the national curriculum?

N/A

Q15. What additional upskilling do AMEP teachers need to take full advantage of any online learning modes?

N/A

Q16. What online learning resources or platforms would you recommend for the AMEP?

N/A

Q17. What is best practice in the provision of student counselling and pathway guidance?

Student counselling and pathway guidance has been a crucial part of the AMEP. It is essential that all student counsellors can provide culturally competent, person centered and appropriate support. SCoA recommends that cultural competence training for all counsellors be required, as well as understanding of the specific barriers and issues that may face individuals in their settlement journey. Access to appropriate translation as required is also best practice to ensure the student can get the most out of the sessions. It is also essential that student counselling and pathway guidance does not have a narrow focus on employment or vocational outcomes, and is able to work with other non-vocational learning difficulties. This is particularly pertinent to ensure that individuals who are not eligible for other settlement support are well supported.

Collaboration with settlement service providers and employment service providers must also be considered. This will ensure consistency in information and support provided in the provision of student counselling and pathway guidance, and recognises the AMEP's role as part of a holistic view of settlement support. Consideration should be given to including KPIs related to this, to ensure this is consistently embedded within the program.

Q18. How many hours of pathway guidance does a student need on average?

N/A

Q19. When should payment for pathway guidance be provided?

N/A

Q20. What is best practice in tutor training and support?

Given the strong settlement focus of the AMEP, tutor training and support must also include settlement training and support alongside teaching-specific development. Including training on SCoA's National Settlement Outcome Standards would provide a strong understanding of settlement needs and how tutors can have an effective role in supporting settlement needs.

Q21. Are there any other changes to the Volunteer Tutor Scheme the Department should consider?

While SCoA supports the proposal to introduce a payment for the costs of recruiting, matching and training tutors, we also see a need to recognise the cost of continuous support and development for existing tutors. Ongoing support and development takes up a considerable proportion of the resources required to maintain an effective Volunteer Tutor Scheme, and therefore must be recognised in the funding model.

Q22. What do you think of childcare options 1 and 2?

Childcare ensures that women are able to access the AMEP, and it is well understood that inaccessible childcare options can prevent or delay women in accessing the AMEP (Shergold, Benson and Piper 2019; Social Compass, 2019). Any woman who needs childcare should be able to access it for free.

The set amount/lump sum childcare options proposed in the discussion paper would put the onus on the provider to make decisions about who to give childcare. It would mean they would have to turn away people who are eligible for AMEP hours but for whom there is no funding left for childcare. This would risk women being pushed into the community-based model despite being eligible and able to complete formal AMEP tuition. This directly discriminates against women, and goes against the goals of new model making the AMEP more flexible and accessible.

As a matter of equity, all students should be able to easily access the child care subsidy, with the AMEP program covering the gap. This would ease the funding pressure on the AMEP.

It is also essential that those engaged in distance learning also have access to childcare.

Q23. What role can informal childcare arrangements, such as crèches and mums and bubs' classes, play?

Informal childcare arrangements including creches and mums and bubs classes can play an important role in supporting women's access to English language classes by offering choice and flexibility. However, they should not replace access to free and accessible childcare under the AMEP. No woman who wants to access childcare options in the AMEP should be pushed into a mums and bubs class or other arrangements.

Q24. What outcomes should be the focus in measuring AMEP performance?

The AMEP is a key pillar of Australia's settlement programs. Rather than developing AMEP outcomes in isolation, AMEP outcomes measurement must be integrated with outcomes measurement in other settlement programs, including the Humanitarian Settlement Program (HSP) and Settlement Engagement and Transition Support Program (SETS). There needs to be strong outcomes measurements that sits across all programs and measure the same outcomes, recognising that all three of these programs have the same end goal of good settlement.

Q25. What does quality service delivery in AMEP look like?

High quality service delivery in the AMEP should actively consider settlement outcomes, due to the relationship of the AMEP to all components of settlement. As existing education sector quality and regulation mechanisms do not test for settlement quality, this needs to be factored into this model to ensure the continued settlement focus of the AMEP.

Q26. What mechanisms should the Department use to monitor quality service delivery and client outcomes by providers?

N/A

Q27. How should provider performance be reported?

N/A