



**Refugee Communities Advocacy Network (RCAN)
Submission to the Department of Home Affairs'
Reform of Adult Migrant English Language**

09 July 2021

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1. Introduction

Refugee Communities Advocacy Network (RCAN) welcomes the opportunity to respond to the Reform of Adult Migrant English Language Discussion Paper. RCAN advocates on behalf of the refugee community in NSW. RCAN is established and led by refugees, people with refugee lived experience and asylum seekers who live in NSW.

RCAN is pleased that the 510 hours limit is removed. That ensures that those who need the AMEP and are eligible can continue participating in the AMEP beyond that.

This submission will discuss the proposed reforms and provide critical feedback.

2. Background

Refugees who come to Australia come from war situations. Refugees are often forcibly displaced. They are forced to cross borders into the first countries of asylum. War, displacement and seeking refuge in the first countries of asylum place refugees in traumatic situations. When refugees come to Australia, they continue to be affected by those experiences. It is now generally accepted that people who experience trauma situations may have difficulty learning.

The Australian Government selects refugees based on their vulnerability. At least, in theory, refugees who come to Australia are likely to have been deprived of social, economic and political rights. Therefore, it is common to find among refugees many people who were illiterate on arrival and likely experienced poverty for a significant amount of time.

Refugees who came to Australia over the last two decades come from collectivist societies. This means that the Australian culture may conflict with their traditions and beliefs. Many refugees suffer cultural shock when they arrive in Australia. They often adjust to life in Australia over a long period.

The Challenges outlined above have significant implications for refugees in terms of language learning. Therefore, it may take significantly longer time for refugees to learn English and achieve high English proficiency levels.

3. Payment scheme

The proposed changes associated with linking payment to outcomes rather than upfront payment for outputs are welcome. However, care must be taken in the payment scheme design to ensure that both providers and students are appropriately supported.

Outcomes-based payment schemes are necessarily complex. This is because they need to respond to challenges that arise from the fact that achieving outcomes for clients is a nuanced process. As discussed above, refugees come to Australia with many challenges, and their capacity to achieve high levels of English proficiency could take a significant amount of time. Even within this cohort, those literate in a language other than English can achieve a high level of English proficiency compared to those refugees who come to Australia with no literacy. Younger refugees may do better than

their older counterparts. Migrants who come to Australia under different migration streams may do much better than refugees.

Therefore, the AMEP payment scheme has to be adjusted to ensure that the outcome is specific to each student based on their needs and circumstances. The outcome must not only be the achievement of a certificate to show the accomplishment of a given set of units but also about other outcomes.

Payments scheme design must ensure that each student can demonstrate a certain level of improvement in their English language learning. Therefore, providers who support students who come to AMEP with no English to achieve a certain level of English understanding should receive more payment compared to providers who take on students who are literate in a language other than English and support them to achieve high levels of English proficiency.

4. Flexible delivery of tuition

Flexibility is one key feature of the outcomes-based model. Providers can experiment with new ways of delivering services. English language tuition can be delivered in a number of established ways. This includes face-to-face in person, distance learning and online.

The face-to-face in person can be done at various locations in addition to the classroom. The majority of tuition will continue to take place in the classroom. However, there is no reason why classes could not take place in venues other than the classroom. For example, a class can take place in the park. Students could learn about exercise and the use of the standard equipment used in the park for exercise. That class could be an opportunity to learn about body parts that are engaged in exercise. The AMEP classes can be delivered in countless other venues. Adults learn well by experience, especially those who come from backgrounds where literacy is non-existent.

Since it is expected that distance learning is likely to decline, the focus should be on learning online. Learning online could replace distance learning as an alternative method of delivering the AMEP. The experience of COVID-19 lockdowns means that online learning is becoming more important. However, online learning can be a challenge to many recently arrived refugees. This could be because many, not all, may not be familiar with the use of digital technology. The navigation of digital platforms to access tuition could be significantly challenging. Therefore, digital literacy must be included in the AMEP curriculum to ensure that students can use online platforms as an alternative to face-to-face in person learning.

Another significant challenge with the use of online platforms is access to devices such as computers. AMEP students should be assisted to get their own devices. For those of may not be able to obtain devices, making devices available to them to use and borrow is necessary. Therefore, AMEP providers should invest in devices such as computers that they would make available to those students who cannot acquire them.

5. Community and work-based learning fund (CWLF)

Community-based learning can play an essential aspect in support students to learn English. The outcome of Community-based learning should not be exclusively about conversational English. Community-based learning should be about supporting participating students to determine what the outcome must be. For some students, the outcome of community-based learning could be improving conversational English. For others, the outcome could be meeting new people or simply engaging in a safe activity in a safe space that could give them confidence in social engagement outside the home. Therefore, community-based learning must not have a formal and rigid curriculum.

Community-based learning could be a significant opportunity for refugee community organisations to participate in supporting English learning. Refugee Community-based organisations could be funded to deliver community-based learning. Funding could be used to fund the position of a program coordinator and cover costs associated with hiring a venue, providing refreshments, and many more. The program coordinator would recruit volunteers from the community to run the groups. The advantage of having refugee communities delivering community-based learning is that it recognises that the refugee communities can promote English learning. The participation of refugees who have been in Australia for longer ensures that misunderstandings often experienced with the provision of services by outsiders, including cultural and language challenges, are minimised if not eradicated.

Work-based learning is a critical addition to the AMEP program. This will open up opportunities for many AMEP clients who come to Australia with a significant level of work experience and expertise. It is now possible that those who do the AMEP with a specific career pathway in mind can achieve English language tuition relevant to that particular career pathway. The opportunity to participate in work-based learning would enormously enhance and consolidate career language proficiency.

6. Strengthening students and pathway guidance

Outcomes-based models often focus attention solely on providers. However, in the case of the AMEP, students will benefit from offering incentives to improve their language learning. Pathway guidance can be used as an incentive to motivate the student to do better. One complaint that some refugee AMEP students make is that the AMEP program is not focused enough. Those students often feel demoralised. Many refugee students who completed the AMEP could not speak English and were unable to find employment. Therefore, pathway guidance could define what the student would like to achieve at the end of the AMEP. A clear plan should be developed with the student and the student supported to follow the agreed-upon pathway.

Counselling can play an essential role. Refugees often have complex needs. These complex needs can challenge the capacity of refugees to learn. Therefore, counselling can help student navigates some of those needs. Students can be referred to other services for assistance.

7. A new payment structure for childcare

Childcare is essential, in particular for female students. Often, refugee women don't participate in the AMEP due to childcare responsibilities. It does not make sense that AMEP students are excluded from Childcare Subsidy (CCS). It would make sense to make CCS available to AMEP students.

AMEP service providers are not childcare providers. Therefore, AMEP service providers should stop providing childcare services. Children of AMEP students must access high-quality childcare. Quality childcare care only be supplied by providers whose job it is to provide care for children.

Making the CCS available to AMEP students and improving access to childcare through established childcare providers will improve care outcomes for children. It also enables AMEP parents to choose where to place their children rather than being forced to put their children where the AMEP provider directs them. It also means that AMEP students with young children do not rush after AMEP classes to pick up their children. Those students, therefore, may focus more on achieving English learning outcomes as they are not worried about picking up their children.

8. A new performance management framework

The challenge for any outcomes-based model is to define outcomes clearly. The nature of expected outcomes and the diversity among client cohorts determine how providers are paid. On the surface, this is simple. However, it is very challenging. Even when the outcome is clearly defined, it can still be a challenge as providers might inadvertently operate in ways that maximise the outcome for them at the client's expense. In addition, it could be challenging to determine what constitute positive outcome indicators. It is challenging to determine what the contribution provision of support makes towards achieving an outcome – is improvement in English proficiency an outcome of the AMEP, or is it a function of the length of time students live in Australia? If both contribute to improved outcomes, how much is the AMEP contribution to achieving that outcome.

The outcome for the AMEP students cannot be one-size-fits-all. People who enrol to do the AMEP come with different capacities and capabilities. Those who enrol at AMEP with a previously higher level of literacy in other languages than English are better placed to achieve improved English proficiency levels than those who are less educated or illiterate. Women who have care responsibilities may not achieve much progress.

To make things more complicated, there is diversity among students. Students with refugee backgrounds are less likely to perform at the same level as students with different migration experiences. Younger students may do better than older people.

Therefore, AMEP outcomes should be determined along a spectrum depending on the needs of the student. This spectrum should be from improved English proficiency to achieve employment and higher educational level to achieving basic conversational English. Other outcomes could include improved student level of confidence, including in Engaging with other students, building their capacity to participate in society socially and economically without necessarily achieving any improvement in English proficiency.

9. Conclusion

In conclusion, AMEP reforms are a welcome and positive change. The shift from output to outcome payment is a significant improvement. However, the reforms should be implemented so that the pitfalls of outcomes-based models are avoided. The outcomes for the AMEP must be based on individual needs and aspirations. The outcomes must be meaningful for students.

RCAN has proposed a spectrum-of-outcomes model. This avoids the problem of one-size-fits-all. Students should not be expected to achieve at the same level and the same outcomes.

In addition, the AMEP program must find a way of motivating students. This can be done by providing proper support and laying out clear pathway guidance that leads to something meaningful from the student's perspective.

The flexibility that is inherent in the outcomes-based model is a significant change from the current approach. AMEP providers will be able to innovate and find alternative ways of supporting students. Community-based learning is an important initiative. It will be critical for a refugee community organisation to receive funding to enable them to participate in the delivery of community-based learning.