



Refugee Council
of Australia

SOCIAL COMPASS EVALUATION OF THE ADULT MIGRANT ENGLISH PROGRAM

EVALUATION OF THE ADULT MIGRANT ENGLISH PROGRAM (AMEP) NEW BUSINESS MODEL (NBM)

The Refugee Council of Australia (RCOA) is the national peak body for refugees, people seeking asylum and the organisations and individuals who work with them, representing over 190 organisations. RCOA promotes the adoption of humane, lawful and constructive policies by governments and communities in Australia and internationally towards refugees, people seeking asylum and humanitarian entrants. RCOA consults regularly with its members, community leaders and people from refugee backgrounds and this submission is informed by their views.

English fulfils a vital role in the settlement process. AMEP plays an essential role in supporting newly arrived refugees in learning an adequate level of English to successfully settle in Australia and integrate into work, community and further studies. While people also learn English in a more informal basis through community networks, this cannot and should not replace the critical role of qualified AMEP teachers. TESOL qualified and experienced teachers are essential to ensure newly arrived refugees develop the skills they need to settle in Australia.

To this end, RCOA reiterates the importance of the AMEP. AMEP has a long history in Australia and is recognised internationally as a highly successful and well supported program. We reiterate the need to continually improve and development of this program. The following recommendations highlight some concerns RCOA has with the introduction of the new AMEP contracts. These concerns have been shared with us by AMEP providers and other settlement service agencies, through our consultation processes.

1 What do you see as strengths of the AMEP NBM? In particular, the elements identified in the evaluation objectives.

AMEP is an essential program for providing refugees and migrants with the language skills they need in order to facilitate and improve the settlement process. Some positive developments in the AMEP program include:

- Continuation of the Social Stream as the newly developed Social English stream. The development and continuation of this stream is welcome, given that not all migrants and humanitarian entrants come to Australia with the skills ready to participate in a formal

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classroom setting, particularly in relation to pre-employment programs. However, RCOA also has concerns that are detailed in the next section.

- The implementation of AMEP Extend. The additional 490 hours provided by AMEP Extend is a positive development in responding to the diverse and individual needs of clients.
- The provision of free childcare for clients ensures that the program is accessible to clients with young children, especially for women with childcare responsibilities.

2 What do you see as weaknesses the AMEP NBM? In particular, the elements identified in the evaluation objectives.

Following the draft AMEP service provider instructions in 2016, RCOA and FECCA wrote to the Department expressing concern with a number of changes. These included:

- The absence of minimum qualifications for teaching in the new Social Stream. The instruction of the Social English stream by unqualified teachers does not address the needs and interests of particularly vulnerable clients. Language teaching is a specialised field requiring knowledge of Teaching English as a Second Language (TESOL) methodology gained through postgraduate TESOL qualifications and teaching experience. Creating large conversation classes taught by unqualified staff does not best serve the interests of the quite vulnerable clients in these classes.
- The very limited use of bicultural workers. Bicultural workers have been shown to support student learning and assist teachers in explaining complex issues. It has also supported students with other aspects of their learning and settlement, including receiving support in a culturally sensitive way.
- The requirement that students with mutual obligation requirements with Centrelink must be enrolled in the pre-employment stream.
- The doubling of class sizes under the Special Preparatory Programme. It is difficult to envisage how the needs of this client group are effectively met in larger classes. We are concerned that larger class sizes compromise this program, especially as this group of students are particularly vulnerable and need additional support in small classes.
- The reduction of funding for the Settlement Language Pathways to Employment/Training Course.
- The removal of funding for counsellors. Unlike the previous contract, there is no counselling function in the proposed new contract. This raises concerns about the degree of support there will be for humanitarian clients suffering the effects of torture and trauma.
- The inadequacy of the funding for child care. Day Care Centres take bookings for either morning or afternoon sessions or full day sessions and a five hour class extends in to the afternoon session resulting in the AMEP provider having to pay for a full day. The cost of a full day session ranges from \$85 - \$105, well above the \$52.50 (ex GST) the Commonwealth ipays for clients in a five hour per day class or the \$63 (ex GST) if travel is involved.
- The need for adequate safeguards in work experience programs to prevent exploitation.
- The need to retain the AMEP's objective as a settlement program, and
- The need to provide access to AMEP for people seeking asylum.
- While RCOA welcomes the addition of AMEP Extend, the implementation of AMEP Extend however these hours remain capped within providers' overall budgets.
- The lack of post-AMEP English development programs or options for further study. The SEE program is the only English learning pathway from the AMEP once clients have utilised their maximum number of instructional hours. This program also excludes clients in distinct visa categories and/or those who cannot meet the Key Performance Indicators of the program.

3 What changes do you think could strengthen the AMEP NBM and why?

Our most recent recommendations regarding AMEP were provided in our submission to an evaluation of this program in 2014. Some of these recommendations concerned a need for greater involvement of community members in the program, including:

- Greater use of bicultural teachers and teachers' aides
- Increased use of mentor and volunteer activities to increase support
- Greater engagement with, and support for, refugee community organisations in the design and delivery of the program
- Removal of the 510-hour limit for the program and replacement with a needs-based assessment
- Greater flexibility for teachers including reducing the number of assessments
- Greater access and consistent implementation of part-time and evening classes
- Greater flexibility for people to leave the program and return
- Alternatives for those with higher English fluency wishing to prepare for tertiary level study and professional employment
- Free childcare that covers the actual costs associated with childcare, including adequate travel and recognition of costs of all day childcare
- Flexible start and finish times to suit needs of parents with children in school
- Funding of carers to enable those with caring responsibilities to attend
- Funding for AMEP contractors in regional areas without Intensive English Centres to introduce flexible models of English language provision and training
- A loading for refugee youth to offer targeted youth-specific courses, and
- A strategy for improving access to refugees with pre-school children.
- The criteria for admission to the SEE program should be widened, to allow more AMEP clients to progress into the program.
- The cap on places within the SPP program for humanitarian entrants should be lifted, and classes should be returned to their former size to ensure that instructors have ample time and resources for each client.
- Ensuring that the Social English stream is not instructed by unqualified teachers who do not hold a postgraduate TESOL qualification.

4 Are there any other issues you wish to identify?

Employment focus of AMEP may undermine other settlement outcomes

During consultations with our members, a large number of service providers emphasised the need to keep AMEP as a settlement-focused program, separate from the employment-focused English language programs available. The goal of AMEP is to give people the English language skills that they need to settle well in Australia, not simply the skills they need to secure employment. These include English in social settings, English for everyday activities such as going to the bank and going shopping, English for navigating various government and community services and many other regular activities.

Some of those consulted have expressed fears that the AMEP may become more employment-focused and its settlement component undermined. There is concern that an employment-focused program would not address the complex needs of many new arrivals, especially those who have multiple needs, such as those arriving under the Woman at Risk program. Moreover, not all AMEP students are on an employment pathway, at least not immediately (eg full-time carers, people who are over retirement age).

We believe that a careful balance needs to be struck to ensure that the settlement component of AMEP is maintained. Undermining the settlement focus of the AMEP could in turn undermine the development of language skills essential for successful settlement, and thereby undermine the capacity of new arrivals to navigate life in Australia.

Access to AMEP class for people seeking asylum

While we welcome the previous announcement that refugees on temporary visas will be eligible for AMEP, RCOA strongly emphasises the need for people seeking asylum to be able to access the

AMEP. As at the end of 2018, there were over 15,000 people who had come by boat living in the community whose applications for refugee status are yet to be fully processed. Most have been living in Australia for many months or even years without access to an adequate English language program. As it is expected to still take years to assess all of these claims, many of these people seeking asylum will remain in Australia for a considerable period of time and will require English language skills so they can live safely and participate in the community. We recommend that all refugees and people seeking asylum, regardless of their visa status, have access to the AMEP.