



# Submission

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## Adult Migration English Program Reforms

9 July 2021

## About this submission

Migration Council Australia (MCA) welcomes the opportunity to respond to the discussion paper on the reform of the Adult Migration English Program (AMEP) to make English tuition more accessible, ensure better quality outcomes of the program and encourage greater participation. This submission details MCA's response to questions outlined in the Department of Home Affairs' Discussion Paper.

MCA is an independent not-for-profit organisation established to enhance the productive benefits of Australia's migration and humanitarian programs. MCA works across sectors to provide a national voice to advocate for effective settlement and migration programs and to develop policy solutions to issues faced by migrants and refugees in Australia.

MCA commends the Government for listening to the settlement and community sector's calls for greater access to free English language tuition for refugees and migrants. We support the first part of the reforms, the removal of the 510 hours cap and the time limit for commencing and completing AMEP course. These changes acknowledge that learning a new language is a highly individual experience which may take longer for certain groups. By removing time caps, refugees and migrants are given the opportunity to advance their English proficiency which enables them to fully engage and participate in the social, economic and cultural life.

For further information on any of the points raised in our submission, please contact MCA on [info@migrationcouncil.org.au](mailto:info@migrationcouncil.org.au) or 02 6162 0361.

## Responses to the Discussion Paper

### **Q1. Is an outcome payment on attainment of certificate levels the most effective way to incentivise student outcomes?**

Migrants and refugees who arrive in Australia are overall eager to enhance their English proficiency, with reasons for learning ranging from improving their job or study prospects, to independently navigating systems and services. Research shows that it is not the lack of willingness to learn that impacts learning outcomes but factors out of the student's control.<sup>1</sup>

An outcomes-based approach where payments are made when certain outcomes and competencies are achieved encourages educators to adjust their teaching methods to the learning styles of their students. However, this approach may have unintended consequences whereby the approach will particularly benefit students who are more responsive to language acquisition due to existing knowledge of English, literacy in own language and overall higher education level.

Consideration should be given to the impact of the approach on the retention and learning outcomes for migrants and refugees who may take longer to learn English. As payment for service providers is tied to the final outcome students achieve, this cohort may be given lesser priority compared to students who are learning English faster, or will be pushed further than

their level of language learning aptitude. This may inhibit learning and may lead to students leaving the program.

Adequate and responsive measures should be in place to support migrants and refugees who take longer to learn.

**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?**

Based on academic evidence and consultations with students from refugee and migrant backgrounds, consideration should be given to including age, gender, experiences of trauma and post-traumatic stress disorder (PTSD), chronic health conditions and disabilities for a cohort adjustment on outcome payments, as factors impacting on second language acquisition.

Research shows that children learn languages faster than adults and after the age of 17.4, language acquisition starts to decline.<sup>2</sup> While it is not impossible to learn a second language later in life, it may take significantly longer compared to children and younger adults. Older migrants with more than ten years of education prior to migration will face similar barriers to learning as younger migrants without prior education.

Evidence points to the female brain being more situated for language learning<sup>3</sup>, and two out of three in the AMEP classes are women.<sup>4</sup> Despite this, women face gender specific barriers to learning English in Australia. Caring for children or older family members can impact class attendance, and women experiencing family violence may have their ability to attend classes restricted by their abusive partners or family members, resulting in prolonged duration of language acquisition. Special consideration should be given to women who have extensive caring responsibilities which AMEP cannot accommodate for and those who may be at risk of or experiencing family violence.

While the extent of prevalence of mental illness in migrant and refugee communities is unknown, studies show that refugees are at high risk of developing mental illnesses, such as PTSD, due to their forced migration and resettlement experience.<sup>5</sup> Symptoms related to PTSD and depression directly affect learning and cognitive function, leading to headaches, poor concentration and loss of memory.<sup>6</sup> Research shows that refugees who reported more severe symptoms of PTSD learned a second language at a significantly lower rate.<sup>7</sup> Additionally, existing health conditions can lead to gaps in learning due to extended absences. Disabilities, such as psychosocial, learning and intellectual disabilities, can also impact a student's ability to learn a foreign language.

The intersection of education level, age, gender and overall health status creates unique vulnerabilities in view of migrants' and refugees' English language acquisition.

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

In order to adequately support the vulnerable student cohort who is likely to take longer to learn English and may never attain a certificate due to reasons beyond their control, consideration should be given to attaching the cohort adjustment payments to the completion of competencies (outputs) instead of certificate attainment (outcomes). This will help avoid situation whereby more vulnerable students are prematurely placed into classes above their abilities.

Additionally, it is paramount to undertake assessment based on students' goals and reasoning for attending classes as achieving a certain outcome may not be in the interest of all students.

The proposed distribution of payments leaves minimal incentives for teachers to support students who may never attain a certificate. The incentive mechanisms may be more beneficial if the focus is on supporting students to achieve reachable goals.

**Q6. What features and functions would you like to see in the new information management system?**

The proposed information management system should factor in the diversity of goals and aspirations for learning English. While some are motivated by learning, others attend AMEP classes to make social connections or contribute to meeting their other settlement goals.

While the proposed information management system includes tracking of outcomes, successfully achieving outcomes is dependent on students' goals and motivations for attending classes.

The AMEP reform should adequately consider and factor in the importance of individual goals for learning English, and develop appropriate monitoring mechanisms to capture those.

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

The AMEP providers' responsiveness and adaptability in the context of COVID-19 by transitioning to online learning is commendable. This has enabled students to attend classes when convenient and contributed to increasing digital literacy among students, noting that the issue of digital access poses challenges for some in the AMEP student cohort. While classroom-based learning is considered more beneficial for students with lower levels of English proficiency, the Department should continue to invest in the development of online/digital learning resources to open up the access for students who prefer the flexibility of learning online or have limited opportunities to attend classes in person. This is also

important for minimising the risk of disruption in view of the pandemic and the related public health measures.

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

Consideration should be given to the levels of digital access, particularly in multigenerational households, and access to Internet.

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

The community-based learning stream may be a useful complementary approach further supporting the flexibility of the AMEP and a multipronged approach to learning. Community-based classes are often delivered through known and trusted community organisations and bilingual workers. Coupled with informal learning, this facilitates welcoming spaces for learning, especially for women.

There is value in maintaining community-based learning as a complementary, informal learning, soft entry approach, that should solely focus on conversational English.

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

Noting the complementary, flexible, informal learning, soft entry approach of the community-based learning stream, it is reasonable that non-accredited curriculum is used to support its delivery. It supports the flexibility of tailoring the learning to students' needs and interests and removes the pressure of delivering accredited curriculum in an informal learning setting.

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

A functional English level achieved through AMEP is generally below the level required by most workplaces, vocational and higher education institutions, or professional accreditation bodies. For those who want to study or have their qualifications from overseas recognised and accredited in Australia, this creates a gap between English proficiency attained through AMEP and labour market demands.<sup>8</sup> Work based learning may be a way to bridge that gap by learning English while gaining Australian work experience, which is recognised as one of the main barriers to employment for newly arrived migrants.<sup>9</sup>

Work-based learning is crucial for migrants and refugees who are struggling to find employment in Australia. Importantly, consideration should be given to ensuring a gender-responsive approach to the work-based learning. Research<sup>10</sup> with migrant and refugee women demonstrates that many want to work but issues such as insufficient Australian work experience and limited networks are barriers to employment. Women should not be further disadvantaged in accessing this program due to gender specific barriers to employment.

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

AMEP may not provide employment and education driven students with the proficiency level required to study or get a job after exiting the program. More support is needed to support these students to find pathways after AMEP, including through career guidance.<sup>10</sup> MCA welcomes the reintroduction of strengthened pathway guidance as this will support migrant and refugees reach their settlement goals.

The student and pathway counsellor plays a crucial role in supporting the students to better understand their interests and motivations, and how these can facilitate enhancing their English skills.

Additionally, student counselling and pathway guidance may also support effective settlement by creating referral pathways to mental health services, play groups, community and parents groups.

**Q22. What do you think of childcare options 1 and 2 (p. 13)?**

MCA recommends option 1, as prioritisation of visa categories can lead to exclusion, and noting that needs and barriers are not tied to visa subclasses.

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- <sup>1</sup> Piller, I. (2019). What makes it hard for migrants to learn the language of their new home? *OpenLearn Free Learning from The Open University*. <https://www.open.edu/openlearn/languages/more-languages/linguistics/what-makes-it-hard-migrants-learn-the-language-their-new-home>
- <sup>2</sup> Hartshorne, J.K., Tenenbaum, J.B. and Pinker, S. (2018). A critical period for second language acquisition: Evidence from 2/3 million English speakers. *Cognition*, 177, 263-277. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6559801/>
- <sup>3</sup> Dionne, G., Dale, P. S., Boivin, M., & Plomin, R. (2003). Genetic evidence for bidirectional effects of early lexical and grammatical development. *Child Development*, 74, 394–412.
- <sup>4</sup> Centre for Policy Development. (2020). Putting Language in Place: Improving the Adult Migration English Program.
- <sup>5</sup> Shawyer, F., Enticott, J.C., Block, A.A. et al. (2017). The mental health status of refugees and asylum seekers attending a refugee health clinic including comparisons with a matched sample of Australian-born residents. *BMC Psychiatry* 17, 76. <https://doi.org/10.1186/s12888-017-1239-9>
- <sup>6</sup> Gordon, D. (2011). Trauma and second language learning among Laotian refugees. *Journal of Southeast Asian American Education and advancement*, Vol. 6 (1). <https://docs.lib.purdue.edu/cgi/viewcontent.cgi?article=1029&context=jsaaea>
- <sup>7</sup> Söndergaard, H. P., & Theorell, T. (2004). Language acquisition in relation to cumulative posttraumatic stress disorder symptom load over time in a sample of resettled refugees. *Psychotherapy and Psychosomatics*, 73(5), 320-323.
- <sup>8</sup> Scanlon Foundation Research Institute. (2019). Australia's English Problem: How to renew our once celebrated Adult Migrant English Program. [https://scanloninstitute.org.au/sites/default/files/2020-01/June2019\\_Scanlon-Institute\\_Narrative-3.pdf](https://scanloninstitute.org.au/sites/default/files/2020-01/June2019_Scanlon-Institute_Narrative-3.pdf)
- <sup>9</sup> Harmony Alliance: Migrant and Refugee Women for Change (2018). Migrant and Refugee Women's Voices. Survey Report. [https://www.harmonyalliance.org.au/wp-content/uploads/2018/11/HA05286\\_SurveyReport\\_web\\_181122-1745.pdf](https://www.harmonyalliance.org.au/wp-content/uploads/2018/11/HA05286_SurveyReport_web_181122-1745.pdf)
- <sup>10</sup> Settlement Council of Australia (2020). Maximising AMEP and English Language Learning – Consultation Report. <http://scoa.org.au/wp-content/uploads/2020/02/SCOA-AMEP-Consultations-Report-2020-PDF.pdf>