

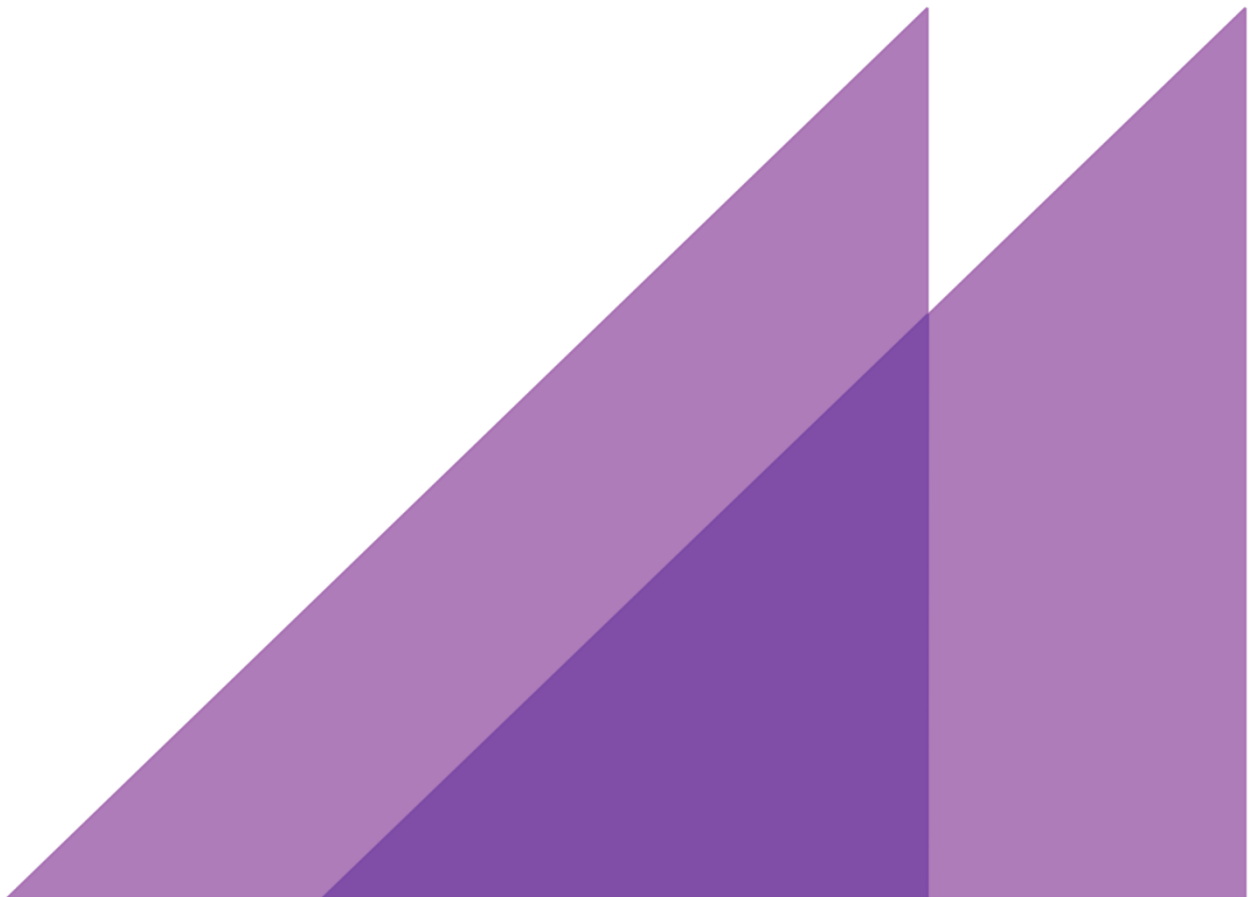
FINAL REPORT TO  
DEPARTMENT OF EDUCATION AND TRAINING

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22 MAY 2015

# AMEP & SEE PROGRAMME ALIGNMENT REPORT

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## Acronyms

AMEP	Adult Migrant English Program
ASQA	Australian Skills Quality Authority
CALD	Culturally and Linguistically Diverse
CSWE	Certificates in Spoken and Written English
DSS	Department of Social Services
EPP	Employment Pathway Plan
ESL	English as a Second Language
HSS	Humanitarian Settlement Services
HTS	Home Tutor Scheme
IELTS	International English Language Testing System
ISLPR	International Second Language Proficiency Ratings
LLN	Language, Literacy and Numeracy
LLNP	Language, Literacy and Numeracy Programme
NEAS	National ELT Accreditation Scheme Limited
RJCP	Remote Jobs and Communities Programme
SEE	Skills for Education and Employment
SLPET	Settlement Language Pathways to Employment/Training Program
SPP	Special Preparatory Programme
USI	Unique Student Identifier

## Executive summary

### Background

The Australian Government Department of Education and Training commissioned ACIL Allen Consulting to conduct an evaluation of the Adult Migrant English Program (AMEP) and an evaluation of the Skills for Education and Employment (SEE) programme.

The evaluations are timely in that both programmes recently moved to new business models. The recent co-location of the AMEP and SEE programme within the Department of Education and Training also provides an opportunity to explore potential synergies and the strategic alignment between the two programmes.

As a consequence this is one of three reports which can be read individually but are inter-related:

- the AMEP Evaluation Report
- the SEE Programme Evaluation Report
- the AMEP & SEE Programme Alignment Report (this report).

### The AMEP

The AMEP was established in 1948 and was legislated under the *Immigration (Education) Act 1971*. The AMEP provides up to 510 hours of free English language tuition to eligible new migrants and humanitarian entrants. Some AMEP clients are eligible to access additional tuition and support under a number of the AMEP sub-programmes.

The AMEP aims to promote and support the acquisition of English language skills by all eligible adult migrants and humanitarian entrants, through the provision of timely and quality English language services. Through language tuition, the program aims to produce outcomes in relation to social participation, economic wellbeing, independence, personal wellbeing, all contributing to settlement within, and integration into, the broader Australian community.

Specifically, the AMEP is intended to assist eligible migrants and humanitarian entrants in the development of English language skills that are needed to access services in the general community, provide a pathway to employment, undertake further study or training and participate in other government programmes.

The AMEP clients can undertake training through four tuition modes.

- *Classroom-based*: full or part-time classroom tuition during the day, evening and weekends and in formal or community-based settings.
- *Distance learning*: curriculum materials specifically designed for out-of-classroom learning, supported by regular contact with a teacher, often over the internet or the telephone.
- *Home Tutor Scheme (HTS)*: trained volunteers provide one-on-one English language tuition to clients, usually in the client's home (under the HTS, AMEP service providers train and provide professional development for home tutors).

— *Self-paced e-learning*: online learning modules available to all AMEP clients to supplement AMEP tuition; no hours are deducted from an AMEP client's entitlement.<sup>1</sup>

The AMEP also allows eligible clients to access additional support and tuition, under two sub-programmes—the Special Preparatory Programme (SPP) and the Settlement Language Pathways to Employment/Training (SLPET) Programme—as well as supporting the learning and settlement needs of clients through the provision of counselling services, childcare and a translation referral service.

## The SEE programme

The SEE programme commenced in 2013 as the continuation of the Language, Literacy and Numeracy Programme (LLNP). The SEE programme is the Australian Government's primary programme for helping eligible job seekers to improve their language, literacy and numeracy (LLN) skills with the expectation that such improvements will enable them to participate more effectively in training or in the labour force, leading to long-term gains for the economy and the community more broadly.

The LLNP commenced in 2002 when the Literacy and Numeracy Training Programme and the Advanced English for Migrants programme amalgamated to provide a more integrated management approach to addressing LLN needs among job seekers at the national level.

A review of the LLNP in 2013 identified opportunities to make the programme more flexible and efficient. This included a name change to remove perceived social stigma associated with the programme's name.

SEE programme clients can access up to 800 hours of free training which can be undertaken on a part-time (10 to 19 hours per week) or full-time (20 to 25 hours per week) basis over no more than a two year period. The programme provides initial, basic and advanced accredited English language training, as well as basic and advanced literacy and numeracy training. The number of training hours undertaken weekly by each client is set out in Individual Training Plans (ITP).

Clients are offered one of three streams of training, based on their assessment results:

- *Initial Language stream*: designed solely for clients whose first language is not English and who at the time of the Pre-Training Assessment (PTA), achieve Australian Core Skills Framework (ACSF) Level 1 or below in all ACSF reading and oral communication indicators.
- *Basic Language, Literacy and Numeracy stream*: accommodates both language and literacy/numeracy clients, and focuses on consolidating functional LLN skills.
- *Advanced Language, Literacy and Numeracy stream*: accommodates both language and literacy/numeracy clients who have higher ACSF scores than those in the Basic stream.

<sup>1</sup> Access to e-modules is available to all members of the public and not restricted to AMEP clients.



These clients generally achieve between ACSF Levels 3 and 5 in reading, writing and oral communication.

Finding employment after undertaking the programme's training is the ultimate measure of success, however attainment is also important. Attainment is measured by comparing the client's LLN improvements in ACSF indicators from their PTA to the later assessments during and at the end of their training.

## Evaluation approach

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The evaluation has been designed around a set of research questions examining the appropriateness, effectiveness, efficiency and performance management of the AMEP and the SEE programme. The research questions are broad ranging, covering the design of the programmes, their systems for tracking against achievement of programme objectives, as well as operational monitoring and reporting, and their performance in delivering services to meet client needs.

The evaluation sought evidence from multiple sources involving a scan of programme documentation, analysis of programme administrative and operational data, and extensive consultation with stakeholders across all states and territories comprising interviews, focus groups, surveys and a public submission process. The nature of the evaluation has necessitated seeking input from multiple perspectives—namely from programme administrators, contracted providers and clients. The evaluation's findings and recommendations have also been informed by a review of relevant good practices in national and international literature.

## The context for strategic alignment

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Throughout the separate evaluations, it has been acknowledged that the AMEP and the SEE programme are distinct, with different objectives and target groups. Historically, they have resided in separate government portfolios with limited formal connections between the two programmes.

The AMEP has been a comparatively much longer-lived and relatively stable programme. The providers currently contracted to deliver the programme have been involved in doing so for many decades. The SEE programme on the other hand is a more recent programme that has undergone various iterations (as the Language and Numeracy Training (LANT) programme and then the Language, Literacy and Numeracy Program (LLNP)).

The AMEP has been managed and refined within the immigration portfolio until recently, whereas the SEE programme has been much more connected to developments in the broader VET sector, having resided within the industry or education portfolios in recent years.

This evaluation therefore presents a unique opportunity to improve the strategic alignment between the two programmes, but also within the broader suites of skills policies and programmes nationally.

## Findings and areas for further consideration

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The evaluation findings indicate that overall the AMEP and the SEE programme are valued programmes that are providing substantial assistance respectively to eligible adult migrants and humanitarian entrants in promoting and supporting the acquisition of English language skills necessary for successful settlement in Australia, and improving eligible job seeker's

LLN skills, with the expectation that such improvements will enable them to participate more effectively in training or in the labour force.

At the same there are many elements that are common to both programmes and each has the potential to benefit from the experiences of the other, including shared treatment and/or systems, in some cases, as summarised below.

### *Addressing the eligibility gap*

In considering opportunities for the two programmes to work together, there are clear eligibility differences between the AMEP and SEE programme, with eligibility appropriate to the targeting of each programme. One area identified for further consideration is entrants who arrive in Australia under the skilled migrant stream, who are eligible for the AMEP but are specifically excluded from participating in the SEE programme.

The inclusion of skilled migrants – in particular dependents of the primary applicant – would target genuine needs, and it is likely that only those requiring LLN training would seek to enrol in the programme. If skilled migrants become eligible job seekers and are in need of LLN training to achieve success in employment or further training, there is a case on equity grounds for allowing these residents equal access to the SEE programme.

*Further investigation should be carried out on whether the dependents of skilled migrants should be eligible for the SEE programme. This should look at both the financial implications of widening the SEE programme eligibility and the potential positive economic impact of this cohort being able to better integrate into the workforce.*

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#### Recommendation 1 Eligibility gap

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### *Addressing the proficiency gap*

The AMEP Evaluation Report highlighted that clients who complete their 510 hour allocation often exit the programme with a low level of English competency.

The high proportion of those entering the AMEP with zero proficiency and that subsequently exit the AMEP still with very low language skills may subsequently form the large proportion entering the SEE programme facing a 'proficiency gap', as discussed in the SEE Programme Evaluation Report.

Possible options to address this gap could be to extend hours available in the AMEP, develop an intermediate language and literacy programme, or improve the SEE programme's coverage of those with very low LLN. Some stakeholders also suggested that the two programmes could be integrated and "redesigned as an overarching programme with delivery streams for different cohorts depending on their learning needs and community access requirements", though this raises the risk of conflating and confusing the currently clear objectives of the two distinct programmes.

Consistent with the recommendations in both the AMEP Evaluation Report (Chapter 7) and the SEE Programme Evaluation Report (Chapter 7), it is considered that the proficiency gap would best be addressed through expanding or changing the SEE programme's target cohort.

*There are gaps in the development of client language and literacy proficiency which sees some very low LLN skilled clients unable to transition from the AMEP into the SEE programme. Further consideration is needed of whether this very low LLN group should be assisted through either expanding or changing the SEE programme's target cohort. This will need to consider the roles of the Australian Government and states and territories, the potential costs of change (noting the higher needs and thus cost of assisting this group), and the potential benefits of growing the pool of migrants with higher LLN skills.*

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#### Recommendation 2 Proficiency gap

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### *Improving transitions to employment*

The data show that the work experience component of the AMEP has a higher rate of participation than the SEE programme, even though the SEE programme is designed to have a much more direct impact on participant employability and transitions into jobs. Consistent feedback from stakeholders suggest that the AMEP does not meet the needs of some employment-focused migrants, with at least a proportion exiting the programme to work or commence in the SEE programme.

There are a range of possible explanations for the lower proportion of SEE programme participants engaging in work experience, including participant interest in gaining work experience, the opportunities available for work experience, or other factors relating to programme design or funding models.

There are insufficient data and evidence available to determine the relative contribution of these various factors on SEE programme participants and sub-cohorts therein, including CALD (Culturally and Linguistically Diverse) participants who may have more in common with AMEP participants.

Given the significant difference between the participation rates in work experience, further research is warranted to determine the extent to which the lower rates of work experience in the SEE programme may be remedied through changes in the SEE programme's design. The potential to adopt effective features from the design and implementation of the AMEP should be considered, such as an alternative rate of funding, additional hours, and minimum thresholds for participation.

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#### Recommendation 3 Transitions to employment

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*Further research is warranted to determine the extent to which the lower rates of work experience in the SEE programme may be addressed through changes in the SEE programme design, including the potential to adopt effective features from the design and implementation of the AMEP.*

### *Addressing gaps in pathways*

There are currently no formal pathways defined between the AMEP and the SEE programme. Moreover, there are insufficient data available to quantify the extent of flows between the two programmes. However, it is generally accepted that, for eligible clients, the AMEP is often the precursor to the SEE programme. Consideration should be given to defining clearer articulation between the programmes. These should not, however, be so prescriptive as to limit client choice.

To better understand the articulation requirements between the programmes, the forthcoming introduction of the Unique Student Identifier (USI) presents an ideal opportunity to ensure that data on the pathways between the AMEP and the SEE programme, as well as other VET programmes, can be quantified and better understood. AMEP service providers will be required to report Certificates in Spoken and Written English (CSWE) attainment and completion, while SEE providers will be required to report accredited VET attainment and completion. In this respect, the AMEP and SEE programme administrators may not be required to take any action, apart from ensuring that providers understand their obligations to report the AMEP and SEE programme training against the USI protocols.

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#### Recommendation 4 Gaps in pathways

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*Establishing formal processes or pathways for transitions between the AMEP and the SEE programme would be beneficial, but should not be so prescriptive as to limit client choice of the programme that best meets their needs. The AMEP and SEE programme administrators should ensure that providers understand their obligations to report the AMEP and SEE*

*programme training against the forthcoming USI protocols to ensure better data on articulation between the programmes.*

### ***Increasing the number of common providers***

The commonality in the delivery of English language training to CALD cohorts would suggest that there is opportunity for higher levels of provider crossover between the AMEP and SEE programme, providing benefits for both clients and providers.

While independent programme administration is important, a greater level of provider overlap could be encouraged by inviting approved AMEP service providers to apply to be SEE providers and vice versa, highlighting to providers the prospects for economies of scale and scope and the extended positive contribution to the experiences of clients. The level of provider crossover could be further increased if the recommendation in the AMEP Evaluation Report (to adopt a multi-provider model similar to the approach taken in the SEE programme) is adopted.

From the perspective of programme administration efficiency, options could also be investigated to integrate the generic provider requirements with co-recognition across the two programmes, while also minimising the duplication with other external systems, such as ASQA registration and NEAS accreditation.

*A greater level of providers in common between the two programmes could be encouraged by co-inviting approved AMEP service providers and SEE providers for the other programme; this does not mean granting automatic approval to providers looking to expand their delivery, but rather highlighting to providers the prospects for economies of scale and scope, and the likely positive contribution to the experiences of clients.*

*Options could also be investigated for administrative synergies through co-recognition of provider characteristics across the two programmes.*

### ***Differences in the curriculum and benchmark instruments***

In considering the longer-term study aspirations of both AMEP and SEE programme clients, the question arises as to whether improved integration between the instruments and curriculum for both programmes with other language and literacy instruments and benchmarks could be achieved.

Given its position as the primary benchmark for language and literacy (as well as numeracy) in the Australian VET sector, the Australian Core Skills Framework (ACSF) would most likely provide the greatest continuity and coverage from a national perspective. However, there is insufficient evidence to definitively say whether the ACSF would be as appropriate for migrant cohorts to test second language proficiency, compared to the ISLPR and CSWE framework.

Other than adopting a single benchmark instrument, the most appropriate approach to achieve greater integration and continuity between the AMEP and other longer-term benchmarks is to undertake a formal mapping of benchmarks across relevant instruments. It is understood that the Department has commissioned a consortium of national experts to undertake formal mapping of the ACSF to the ISLPR and CSWE curriculum framework. Subject to the outcomes of this work, consideration should be given to formally adopting the mapping framework to facilitate greater continuity between the instruments and benchmarks used in the AMEP with other training programmes and the tertiary education sector more broadly. This would enable consideration of how other Training Package units, such as the

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#### Recommendation 5 Common providers

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**Recommendation 6**  
**Curriculum and benchmark**  
**instruments**


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Foundation Skills Training Package, which are already mapped to the ACSF, could be used alongside the CSWE curriculum framework.

*Building on the recent research mapping the ACSF to the ISLPR and the CSWE curriculum framework, the Australian Government should consider formally adopting the mapping framework to facilitate greater pathways between the AMEP and other training programmes, and the tertiary education sector more broadly.*

*Similarly, the Australian Government should consider the extent to which other Training Package units, which are already mapped to the ACSF, could be used alongside the CSWE curriculum framework.*

### **Focus on industry-relevant training and employment outcomes**

Both the AMEP and SEE programme currently have a substantial focus on industry-relevant training and appropriate employment outcomes for clients. The SEE programme has an explicit and direct focus on achieving employment for eligible job seekers, while the AMEP recognises that engaging in the labour market is pivotal to successful settlement.

The AMEP Evaluation Report (see section 7.1.6) discusses the tension between the programme's focus on settlement versus employment and highlights stakeholder concern that an increasing emphasis on employment and economic participation will gradually start to displace the programme's primary objective of settlement.

Similarly the SEE Programme Evaluation Report (see section 7.1.3) raises the tension between the long-term investment in LLN versus the short-term focus on job outcomes. While these objectives are not mutually exclusive, stakeholders report that the current approach to employment services and income support means that immediate employment opportunities can be expected to supplant the long-term commitment required to improve on individuals language, literacy, or numeracy skills.

Both highlight the fact that the AMEP and the SEE programme are multi-dimensional programmes that seek to be adaptable to the needs and priorities of the individual, whilst serving more than one public policy objective. The pursuit of industry-relevant training and employment outcomes should acknowledge, and not be at the expense of, the more diverse set of policy objectives, nor should it neglect the needs of the individual.

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**Recommendation 7**  
**Employment focus**


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*Both the AMEP and the SEE programme are multi-dimensional programmes serving more than one public policy objective and seek to be adaptable to the needs and priorities of the individual. Any future changes to either programme to improve the delivery of industry-relevant training and employment outcomes should not compromise the diverse policy objectives of the AMEP and the SEE programme, nor should they neglect the needs of the individual.*

### **Consistency with market reforms and client choice**

The current approach to competitive tendering under both the AMEP and the SEE programme is consistent with the policy recommendations outlined in Hilmer's National Competition Policy Review (1993) and the subsequent adoption of competitive principles adopted by COAG, in the mid-1990s.

Greater competition between providers and improved client choice should be expected to lead to more widespread client-focused innovation in areas such as marketing and engagement with prospective eligible migrants, partnerships that better enable providers to meet client needs, targeted models of training delivery, and improved regional access and delivery.

As outlined in the AMEP Evaluation Report (see section 7.2.2), the evolution of the AMEP purchasing model should consider the phased introduction of contractual arrangements that include two or more providers competing in a given region. At the same time, the SEE Programme Evaluation Report (see section 7.2.1) outlines how the design and operation of the multi-provider model in SEE could be further improved.

Given the large number of vulnerable and/or non-English speaking clients that make up the participants of both the AMEP and SEE programme, the quality standards and ongoing reporting and monitoring of providers contracted to deliver these programme regimes in both the AMEP and the SEE programme should remain necessarily high.

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**Recommendation 8**  
Client choice

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*Consistent with VET market reforms to increase client choice, and as outlined in the respective evaluation reports:*

- *the AMEP purchasing model should consider the phased introduction of contractual arrangements that include two or more AMEP service providers competing in a given region*
- *improvements to the design and operation of the multi-provider model in the SEE programme should be based on a framework for viable delivery.*

*Given that clients for both the AMEP and the SEE programme comprise vulnerable and/or non-English speaking participants, both the AMEP and the SEE programme should ensure a necessarily high standard of providers contracted to deliver these programmes.*

***Implications of skills reform for the AMEP or the SEE programme***

Both the AMEP and the SEE programme are tied to areas of direct Commonwealth responsibility, namely migration to Australia and the welfare support system respectively. State and territory governments, on the other hand, have carriage of VET systems.

As state and territory governments develop, implement and amend various entitlement models in line with commitments set out the National Partnership Agreement for Skills Reform, the availability of publicly subsidised training is undergoing substantial change, with two important implications for the AMEP and the SEE programme.

First, the introduction of a student-led entitlement model should in many cases allow individuals to follow up AMEP and SEE programme training with further VET courses. In order for this to be effective, both AMEP and SEE programme clients will need to be well informed about their entitlement eligibility, pathways and options.

Second, ongoing changes to VET funding at the state and territory level are likely to lead to a range of consequences for the availability of subsidised LLN training across the VET sector. To the extent that access to and/or availability of subsidised LLN programmes changes, the AMEP and the SEE programme may come under pressure to fulfil a role that is more significant than originally conceived. Consistent with the advice in both the AMEP (see sections 7.1.4 and 7.1.6) and the SEE programme (see sections 5.2.1, 7.1.1 and 7.1.6) evaluation reports, programme participants should be well informed regarding their entitlement eligibility, pathways and options.

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**Recommendation 9**  
National skills reform

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*There are two important implications of national skills reform for the AMEP and the SEE programme.*

- *The introduction of a student-led entitlement model is likely to allow individuals to follow up AMEP and SEE programme training with further VET courses.*

— *Potential changes to the availability of subsidised LLN programmes, is likely to place pressure on the AMEP and the SEE programme to fulfil a role that is beyond what is intended.*

*In both cases there should be clear and consistent communication of the programmes' objectives to clients and stakeholders, with programme participants being well informed about their entitlement eligibility, pathways and options.*

### **Risk based approaches to regulation**

The Australian Government has placed significant emphasis on reducing the regulatory burden for businesses. The agreed principles underpinning VET reform similarly commit to a modern and responsive national regulatory system that applies a risk-management approach and supports a competitive and well-functioning market.

Calls from both AMEP and SEE providers for the reporting burden to be reduced should be considered alongside the Government's agenda to reduce red tape. Likewise, programme administrators should carefully consider options for streamlining the monitoring, reporting and performance management systems for the AMEP and the SEE programme as outlined in the AMEP Evaluation Report (see section 7.1.2) and SEE Programme Evaluation Reports, (see section 7.1.5), including addressing potential overlaps with ASQA and/or NEAS accreditation systems.

As a first step, the AMEP and the SEE programme should jointly commission research and advice into streamlining the alignment and consistency of provider performance management, reporting and compliance between the AMEP and SEE programme to both increase the effectiveness and minimise duplication for dual providers. The opportunity should also be taken to develop risk-based approaches to provider quality assurance and performance management, consistent with the recent changes to the approaches taken in the regulation of the broader VET sector.

*In line with the Australian Government's agenda to reduce the regulatory burden, the AMEP and the SEE programme should consider options for streamlining their monitoring, reporting and performance management systems, as outlined in the AMEP Evaluation Report and the SEE Programme Evaluation Report. This should include the expansion of risk-based approaches to provider quality assurance and performance management, consistent with recent changes in the regulation of the broader VET sector.*

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**Recommendation 10**  
Risk based approaches to  
efficiency

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# 1 Introduction

## 1.1 Evaluation overview

### 1.1.1 Evaluation objectives

ACIL Allen Consulting was commissioned by the Commonwealth Department of Education and Training to conduct concurrent evaluations of the Adult Migrant English Program (AMEP) and the Skills for Education and Employment (SEE) programme.

The evaluations jointly examined:

- The appropriateness, effectiveness, efficiency and performance management of the SEE programme and the AMEP
- The strategic alignment between the SEE programme and the AMEP, and whether there are opportunities to improve how the two programmes work together.

### 1.1.2 Evaluation context

The evaluation of the AMEP is timely as the programme moved to a new business model in 2011, involving significant changes in programme delivery and administration which were yet to be assessed. Similarly, an evaluation of the SEE programme is also considered timely as the programme saw contract changes in 2012 which involved significant shifts in programme delivery and administration which had not yet been evaluated.

An additional impetus for the evaluation is the:

- movement of the administration of the SEE programme from the then Department of Education, Employment and Workplace Relations to the Department of Industry in 2011, then to the Department of Education and Training in late 2014
- movement of the administration of the AMEP from the Department of Immigration and Border Protection to the Department of Industry in late 2013, then to the Department of Education and Training in late 2014.

The co-location of the AMEP and SEE programme in the Department of Education and Training provides an opportunity to explore the strategic alignment between the two programmes.

### 1.1.3 Evaluation outputs

The joint evaluations of the AMEP and SEE programme have produced three reports:

1. The AMEP Evaluation Report
2. The SEE Programme Evaluation Report
3. The AMEP & SEE Programme Alignment Report (this report).

### 1.1.4 Evaluation method

The evaluation method included:

- A programme document review, and national and international literature review



- Programme data analysis
- Stakeholder consultations including interviews, focus groups, surveys and a public submission process.

Full details on the evaluation method can be found in either the AMEP Evaluation Report or the SEE Programme Evaluation Report.

## 1.2 Research questions and report structure

### 1.2.1 Research questions

The joint aspects of evaluation examine in detail the linkages and gaps between the two programmes and make recommendations regarding their strategic alignment.

The specific evaluation research questions addressed in this report are as follows:

1. Examination of the critical intervention points for client groups in both programmes, including where and how they are different and similar.
2. Identification of existing service delivery gaps and linkages between the two programmes and opportunities to improve outcomes for the respective client groups. This would include identifying common client groups.
3. Factors influencing participant outcomes and pathways, including consideration of post programme outcomes.
4. Examination of the variance and alignment of client eligibility between the two programmes and consideration of the impact of client background (e.g. visa type) on pathways through and between the programmes and to employment.
5. Opportunities to improve links between language, literacy and numeracy training outcomes for appropriate client groups to meet industry need. This would include opportunities for a greater focus on work readiness as a component to training delivered through the two programmes.
6. Consideration of potential strategies to 'bridge the gap' between the two programmes including implications.
7. Examination of the service delivery model, including opportunities for increased efficiencies, noting that both programmes are delivered by the same service provider in many regions.
8. Examination of the different curriculums and assessment tools used by each programme, and identifying any benefits or efficiencies in aligning these, noting that many service providers are shared.
9. In addition to the questions of alignment between the programmes as identified above, the evaluation will examine the strategic placement of both of the programmes within the overall objectives of the suite of skills policy and skills programmes.

### 1.2.2 Report structure

This report specifically addresses the individual research questions listed above according to the structure as follows:

- Chapter 2 identifies the common clients and target groups between the AMEP and the SEE programme, including the programme intervention points, the specific eligibility criteria that apply, and the client groups that are common to both programmes.
- Chapter 3 considers participant outcomes and pathways, and in doing so, identifies the service delivery gaps and linkages between the two programmes.

- Chapter 4 highlights potential strategies to 'bridge the gap' between the two programmes and opportunities to improve client outcomes, along with possible efficiency improvements.
- Chapter 5 examines the strategic placement of both of the programmes within the overall objectives of the government's suite of skills policy and skills programmes.

## 2 Common clients and target groups

### 2.1 Target audience and points of intervention

The AMEP and SEE programme share a common purpose in that both are centred on the delivery of language and literacy training. However, the two programmes have different objectives and therefore different target audiences and points of intervention.

- The AMEP is a targeted programme primarily focused on facilitating the settlement of people arriving in Australia with limited English language proficiency; it therefore targets newly arrived permanent migrants to Australia in the five year period immediately following their arrival in Australia.
- The SEE programme is a mainstream programme directed at job seekers receiving income support payments to improve their LLN skills for the purpose of engaging in work or further study; it therefore targets eligible job seekers that have a capacity to benefit.

As Commonwealth Government programmes, both the AMEP and the SEE programme are specifically tied to areas of direct Commonwealth responsibility: migration to Australia; and the welfare support system.

The following table summarises the target groups for the AMEP and the SEE programme.

Table 1 Target groups of the AMEP and the SEE programme

	The AMEP	The SEE programme
<b>Target groups</b>	Recently arrived permanent migrants	Job seekers receiving income support
<b>Specific inclusions</b>	Some temporary visa holders	Migrants subject to the 104 week waiting period for income support Job seekers aged 15 to 20 not receiving income support
<b>Specific exclusions</b>	Non-migrants and some visa categories	Migrants entering Australia under a skilled migrant category visa Full time students
<b>Point of intervention</b>	Anytime from visa commencement date or date of arrival into Australia	Anytime during which a job seeker is eligible
<b>Referral process</b>	None	Referral required from Centrelink or JSA/DSS/RJCP providers
<b>Age eligibility</b>	18 years and above (Those aged 15-17 years may be eligible on an exceptions basis)	Be of working age, 15 to 64 years
<b>Proficiency test</b>	Those with less than functional English	Be deemed suitable for training without any barriers that would prevent successful participation
<b>Proficiency benchmark</b>	ISLPR 2 or lower	None

Source: Department of Industry, 2014

In addition to the general differences in participant eligibility, two further specific inclusions/exclusions are worth highlighting:

- The SEE programme specifically includes *migrants subject to the 104 week waiting period for income support*. This ensures that those migrants that would otherwise be

eligible for income support and therefore SEE programme training are not excluded from participating due to mandatory waiting period.

- The SEE programme specifically excludes *migrants entering Australia under a skilled migrant category visa*. As discussed in the AMEP Evaluation Report, it does not have such an exclusion for either the primary applicants or dependents of those arriving via the skilled stream.

It is not clear that the exclusion of skilled migrants from the SEE programme is warranted – see discussion in the following section.

An important distinction between the two programmes that governs differences in the point of intervention is the fact that the SEE programme requires a formal referral to be made in order for an eligible job seeker to participate in the programme. The AMEP has no such requirement as it is open to eligible migrants who make direct contact with an AMEP service provider.

Targeting of age groups is consistent with the AMEP’s emphasis on addressing settlement needs and the SEE programme’s emphasis on addressing education and employment needs.

The AMEP is directed at migrants aged 18 years and above, whereas the SEE programme targets those considered to be of working age (15 to 64 years). There is presumably no upper age limit for the AMEP given that settlement issues are not age dependent. This targeting of age groups is consistent with the AMEP’s emphasis on addressing settlement needs and the SEE programme’s emphasis on addressing education and employment needs.

#### Key Finding 1

The AMEP and the SEE programme share a common purpose in that both are centred on the delivery of language and literacy training.

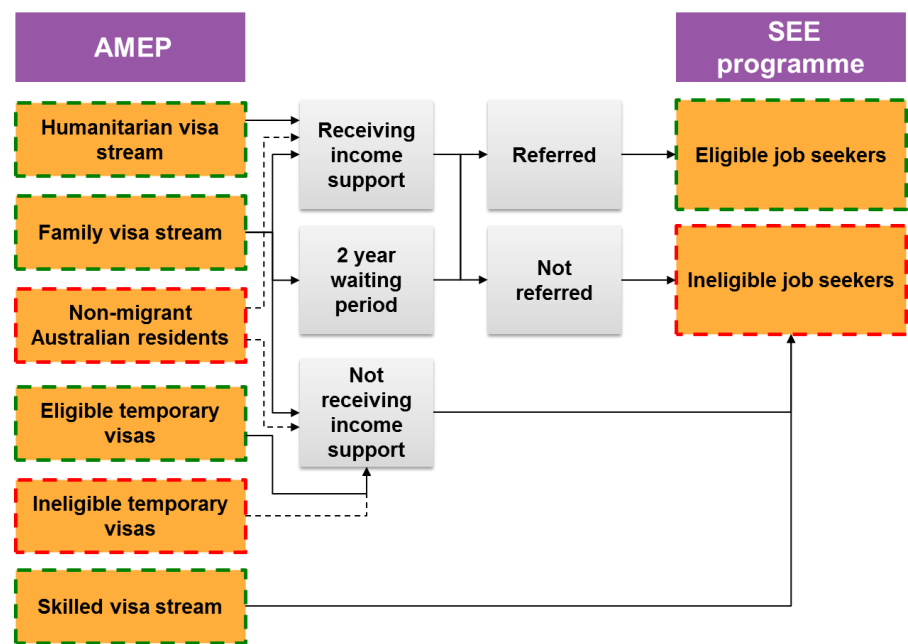
The two programmes do, however, have specific objectives that target different audiences and points of intervention.

## 2.2 Inconsistencies in eligibility criteria

The following figure summarises the main eligibility differences between the AMEP and the SEE programme. The diagram shows that:

- Most migrants arriving on a Humanitarian visa immediately receive income support and would therefore only need to be referred to be eligible for the SEE programme.
- Those arriving on a Family visa may be receiving income support or may be eligible after a two year waiting period; these people would only need to be referred to be eligible for the SEE programme.
- Most of those living in Australia on a temporary visa, including those that are specifically eligible for the AMEP, are unlikely to qualify for income support and would therefore be ineligible for the SEE programme.
- Skilled migrants, regardless of their eligibility for the AMEP and receipt of income support, are specifically excluded from the SEE programme.

Figure 1 Eligibility differences between AMEP and the SEE programme



Note: Categories of participants with green borders are eligible and those with red borders are ineligible.  
Source: ACIL Allen Consulting

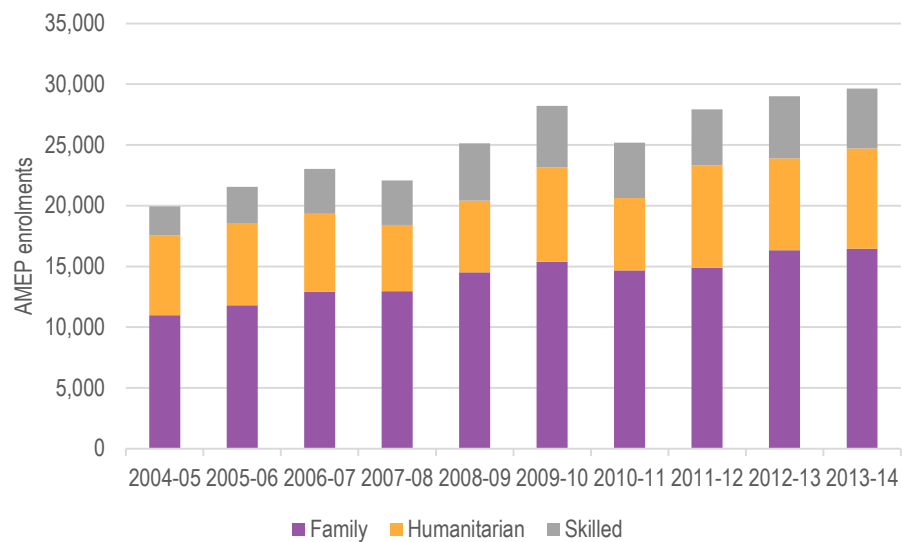
As discussed in the SEE Programme Evaluation Report, a key feature of the SEE programme is the extent to which eligibility is almost wholly dependent on the knowledge, skills and interests of the referring agencies.

In summary, based on the current criteria, there are clear eligibility differences between the AMEP and SEE programme. Most of these gaps can be explained by the deliberate targeting of each programme – for example:

- The requirement for a participant to be receiving income support is a deliberate criterion to ensure that the SEE programme is only available to those Australian residents that are part of the welfare system for which the Australian Government is responsible.
- The exclusion of non-migrant Australian residents from the AMEP is consistent with the fact that the AMEP is first and foremost a settlement programme.

However, for skilled migrants, there appears to be an inconsistency in that primary applicants and their dependents are eligible for the AMEP but are specifically excluded from participating in the SEE programme. This exclusion includes both the primary applicant on a skilled stream visa as well as his/her dependents. This inconsistency is highlighted in the relatively large numbers of skilled stream migrants that enrol in the AMEP (see Figure 1). In 2013-14, 17 per cent of all AMEP participants were from the skilled migration stream – anecdotally, this is believed to mostly comprise the dependents of primary applicants.

Figure 2 AMEP enrolments by visa stream



Source: AMEP dataset

### Key Finding 2

Based on the current criteria, there are clear eligibility differences between the AMEP and SEE programme, most of which can be attributed to the intentional and appropriate targeting of each programme.

Skilled migrants are eligible for the AMEP but are specifically excluded from participating in the SEE programme.

## 2.3 Target levels of proficiency

The targeting of English proficiency levels for the AMEP and the SEE programme are intended to address settlement needs and education/employment goals respectively.

The proficiency level and associated benchmark for the AMEP is functional English or ISLPR level 2; this is the maximum level of proficiency that the AMEP is intended to cater for.

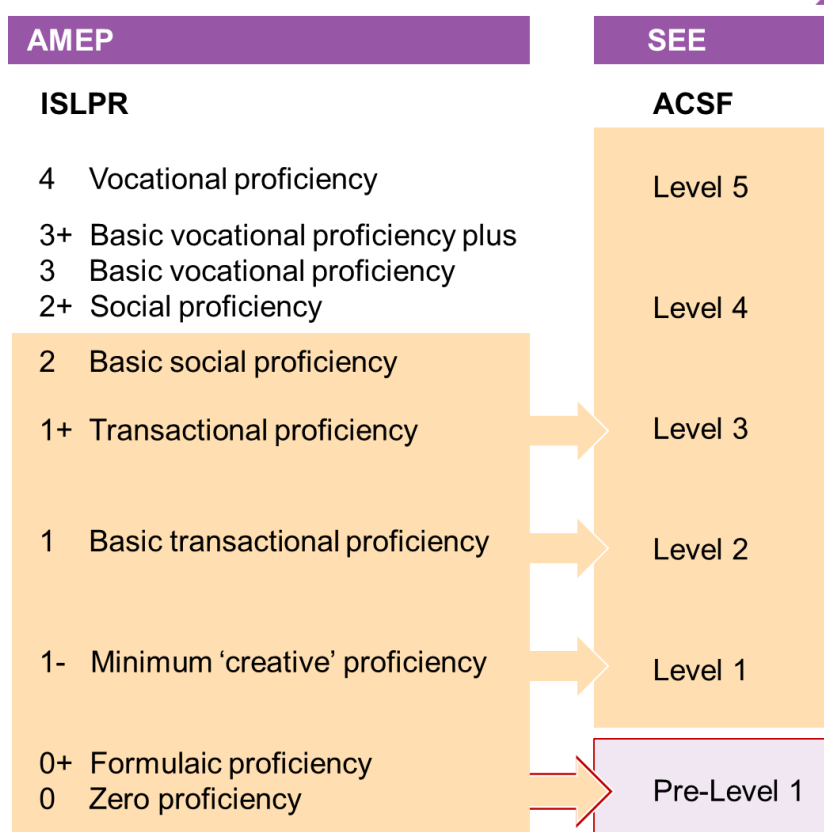
The SEE programme on the other hand has no such upper limit and is open to eligible job seekers on the basis of their 'capacity to benefit'. Training in the SEE programme extends from pre-literate levels of LLN proficiency (known as pre-level 1) all the way to high level performance.

Given the higher levels of skills catered to by the SEE programme, and the fact that the AMEP is intended to be undertaken in the period immediately following an individual arriving in Australia, it is generally considered that for those who are eligible, the AMEP is the precursor to the SEE programme.

Clients benefit most from AMEP participation before SEE programme participation because the AMEP addresses issues relevant to settlement. The settlement needs of newly arrived migrants are different from the training and further study needs of the unemployed.

– SEE provider confidential submission

Figure 3 AMEP and SEE programme target proficiency levels



Note: Potential eligibility gap for those with very low language and literacy highlighted in red.

Source: ACIL Allen Consulting

As discussed in the SEE Programme Evaluation Report, there is some uncertainty associated with the question of whether the programme is intended to target participants with very low levels of English language proficiency. While the SEE programme does not specifically require a minimum level of LLN skills to enter the programme, the requirement to demonstrate progress in the ACSF and the inability to assess progress against pre-level 1 indicators has the effect of discouraging providers from enrolling participants with such low LLN abilities.

If it is the case that the SEE programme is *not* intended to cater to those with very low language and literacy skills, then there is a potential proficiency gap (highlighted in the figure above), whereby those who exit the AMEP but still have very limited proficiency in the English language cannot be adequately served by the SEE programme. These participants currently form a large proportion of SEE programme commencements – 15 per cent of 2013-14 SEE programme commencements scored pre-1 on all 11 performance indicators – and would need access to an alternate English language programme before they have the minimum level of proficiency and skills to participate in the SEE programme.

**Key Finding 3**

There is an overlap between the target levels of proficiency between the AMEP and SEE programme. The AMEP covers lower levels of English language and literacy up to the level of functional English. The SEE programme covers low levels of English up to high level performance in language and literacy (as well as numeracy).

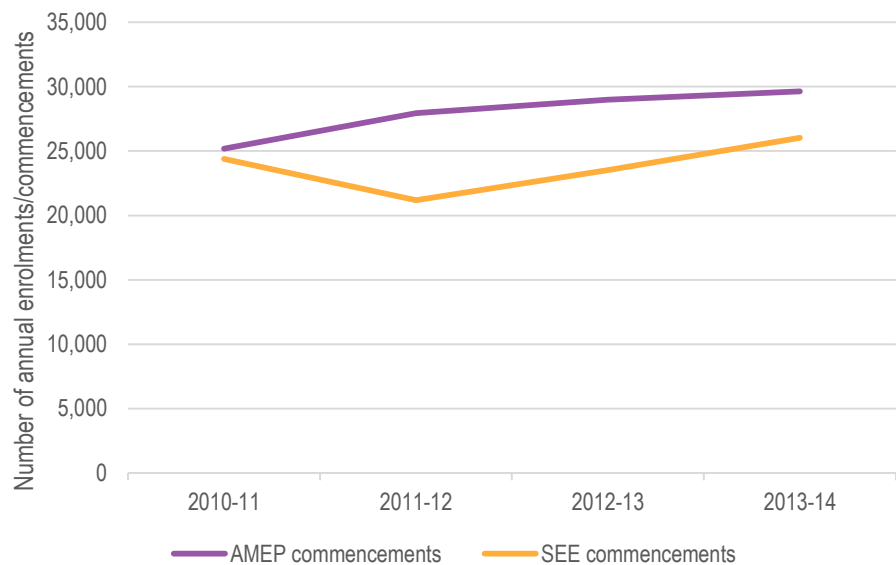
It is unclear from the design of the programme whether the SEE programme is intended to cover very low levels of English language and literacy in the same way that the AMEP does.



## 2.4 Participant profile

Figure 4 presents the overall enrolment level of the AMEP and the SEE programme in recent years. In addition to having a much longer history, the figure shows that the AMEP programme is also marginally larger, with approximately 29,600 new clients in 2013-14 compared to approximately 26,000 in the SEE programme.

**Figure 4 AMEP and SEE programme total new clients (2010-11 to 2013-14)**



*Note:* Note each individual has only one AMEP enrolment, whereas people may have many SEE programme commencements as they exit and re-enter the programme.

Source: AMEP dataset and SEE programme dataset

As the two programmes do not have a common client identification number, and neither AMEP service providers nor SEE providers are required to capture information on whether



clients have participated in the other programme, it is not possible to determine the overlap in the client profile between the AMEP and SEE programme.<sup>2</sup>

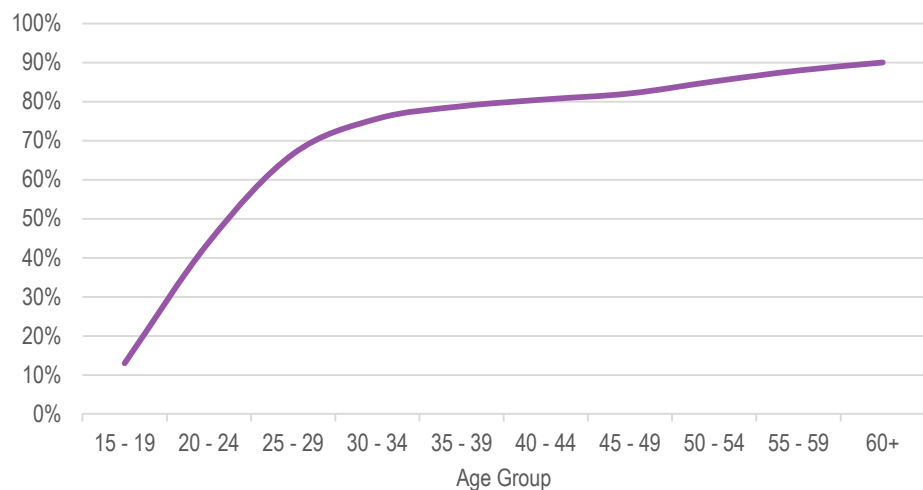
Despite this, there are a number of reasons to believe that there is overlap in client cohorts between the two programmes:

- Many providers consulted for this evaluation commented that a considerable number of SEE programme clients are likely to have participated in the AMEP.
- The AMEP Longitudinal Study finds that 17 per cent of AMEP clients (10 out of 60) went on to study in the SEE programme in the five years the Longitudinal Study was carried out. It should be noted that the Longitudinal Study deals primarily with Certificate III (i.e. high level) AMEP clients who are more likely to have success in the job market and therefore not require the SEE programme.
- 68 per cent of SEE programme clients are CALD, with a country of birth other than Australia, Canada, United Kingdom, Ireland, New Zealand, UK, USA, and South Africa. That is, they are first generation migrants from non-English speaking countries, and as such may have been eligible for the AMEP when they migrated to Australia, contingent on failing to meet the AMEP English language proficiency benchmark. This is far higher than the equivalent proportion represented in the general population (16 per cent) nationally.
- More than 50 per cent of SEE programme clients are reported as requiring an interpreter at their initial assessment. This indicates that a large proportion of CALD SEE programme clients may have been eligible for the AMEP on migration to Australia due to low English language proficiency.

As Figure 5 shows, the proportion of CALD participants in the SEE programme rises with age. For all participants aged 30 and above, CALD participants make up between 76 and 90 per cent of SEE programme clients.

<sup>2</sup> This is further complicated by the fact that, as SEE funding/places are capped, SEE eligibility is variable and subject to a change in line with the number of job seekers qualifying for income support (which is in turn dependent on the unemployment rate and broader economic and labour market conditions).

Figure 5 Proportion of CALD SEE programme clients, by age group



Note: SEE programme clients that commenced training in 2010-11 to 2013-14.

Source: SEE programme dataset

Based on these statistics, the clear conclusion is that there is likely to be a significant cohort that are eligible for both the AMEP and the SEE programme. For many of these clients, the training for language and literacy in the AMEP would set the foundation for further development in the SEE programme.

Given that the participants in the AMEP and the SEE programme share common needs (in terms of language and literacy needs) and common characteristics (coming from a CALD and/or non-English speaking background) the implications are that:

- the participants in both the AMEP and the SEE programme will share some common educational needs and face similar barriers to learning.
- the providers serving some of these clients in common will need to have similar skills, capabilities and strategies to meet the needs of these clients.
- a significant proportion of enrolments in either programme will be the result of transitions from one programme to the other (discussed further in Section 3.3).

#### Key Finding 4

The participants in the AMEP and the SEE programme share many common needs and characteristics, in particular:

- Half of those commencing the SEE programme require an interpreter and
- The proportion of overseas born CALD participants in the SEE programme (68 per cent) is far higher than the proportion represented in the general population (16 per cent) nationally.

## 2.5 Gender and age profile

The following figure presents the gender mix of the various sub-groups of AMEP and SEE programme participants.

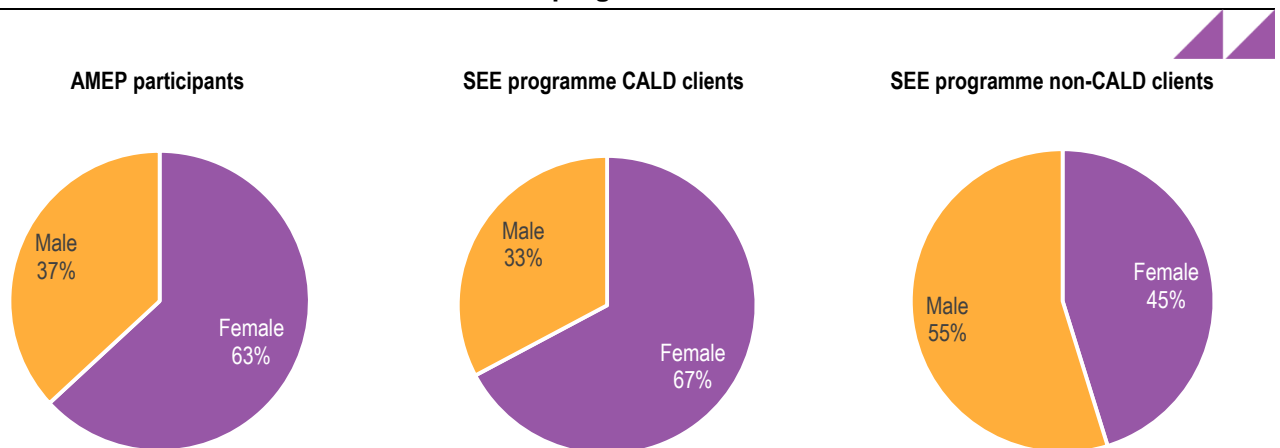
In 2013-14, around 63 per cent of AMEP enrolments were women (Figure 6), although each visa stream has a different gender composition (almost three quarters of Family visa stream

enrolments are women, compared to 40 per cent of Humanitarian visa stream enrolments and 66 per cent of Skilled visa stream enrolments).

In the SEE programme, a high proportion of female participants is also observed amongst the CALD cohort, with 67 per cent being women (Figure 6). The non-CALD participants of the SEE programme are more consistent with the gender split of the broader Australian population with 50 per cent being female.

In the absence of detailed pathway data, it would appear that the higher proportion of female participants in the AMEP is to some extent mirrored in the higher proportion of female CALD participants in the SEE programme, which further reinforces the likely commonalities in client educational needs.

Figure 6 Gender balance of the AMEP and SEE programme clients



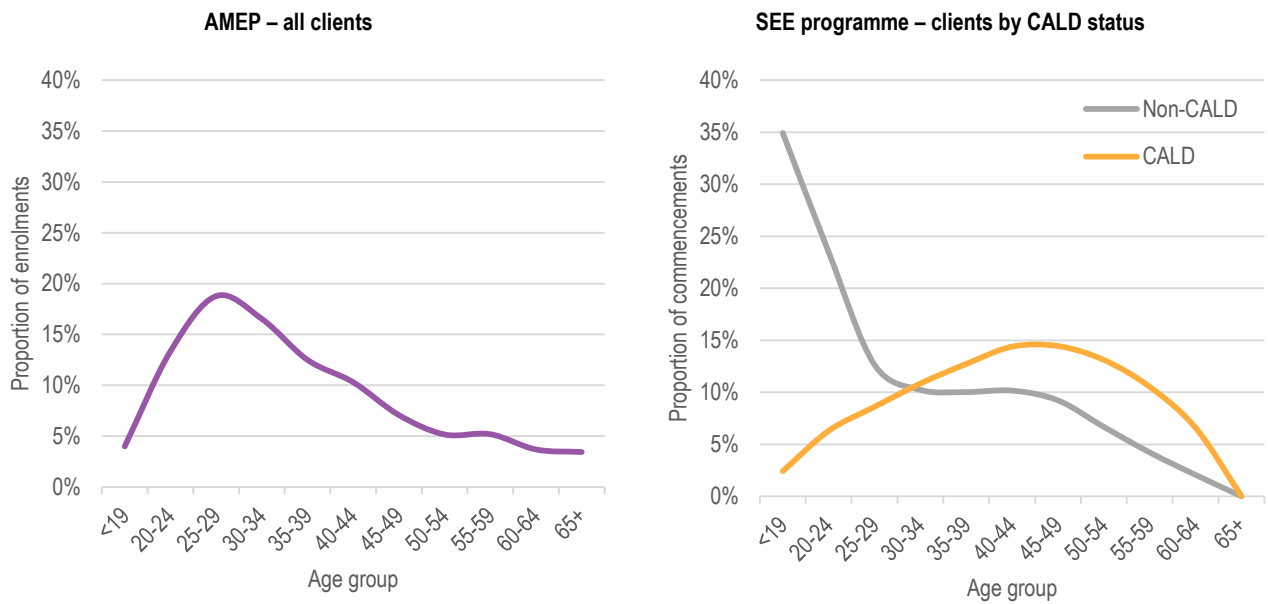
Note: AMEP and SEE programme clients that commenced training in 2010-11 to 2013-14.

Source: AMEP dataset and SEE programme dataset

The age profiles of the AMEP and SEE programme are more distinct, as shown in Figure 7.

- The age profile of AMEP participants is skewed towards younger age cohorts, peaking at the 25 to 29 year old age group.
- CALD participants in the SEE programme have a somewhat more even distribution across the age groups, peaking in the 40-44 year old age bracket.
- Non-CALD participants in the SEE programme exhibit a significantly different distribution, with a large proportion of participants aged under 24 years of age.

Figure 7 Age profile of AMEP and SEE programme clients (2010-11 to 2013-14)



Source: AMEP dataset and SEE programme dataset

The data on age distribution further suggests CALD clients undertake the AMEP before moving on to the SEE programme, when they subsequently become an eligible job seeker. More importantly, it shows a distinct age pattern whereby the age distribution of clients in the AMEP, along with CALD clients in the SEE programme, is similar and substantially different from the highly youth-oriented non-CALD clients in the SEE programme. As discussed in the SEE Programme Evaluation Report, this would indicate that the SEE programme comprises a large proportion of Australian born school-age and youth cohorts as distinct from the older age CALD participants in the SEE programme and the AMEP.

**Key Finding 5**

The age and gender profiles of CALD participants in the SEE programme have more in common with the profile of participants in the AMEP than with non-CALD participants within the SEE programme.

## 3 Participant outcomes and pathways

### 3.1 Participant hours

The AMEP and SEE programme have different patterns of participant retention, as illustrated in Figure 8. Approximately 30 per cent of AMEP participants make it to the end of their total allocation of 510 hours (or more with additional sub-programme hours). SEE programme participants tend to favour fewer hours of participation in the programme, with approximately 30 per cent participating for less than 100 hours. There are likely a range of reasons for this:

- AMEP clients tend to self-select into the programme based on need whereas some SEE programme clients may be required to participate as a condition of their ongoing receipt of income support.
- AMEP clients tend to have a higher level of need for both language and settlement instruction and are therefore more likely to remain in the AMEP course for a greater length of time.
- SEE programme clients may have access to a wider range of alternative activities, including other LLN programmes and vocational training.
- SEE programme clients are reportedly more likely to exit the programme when they are presented with employment opportunities, based on the instruction or advice of their referring agencies.

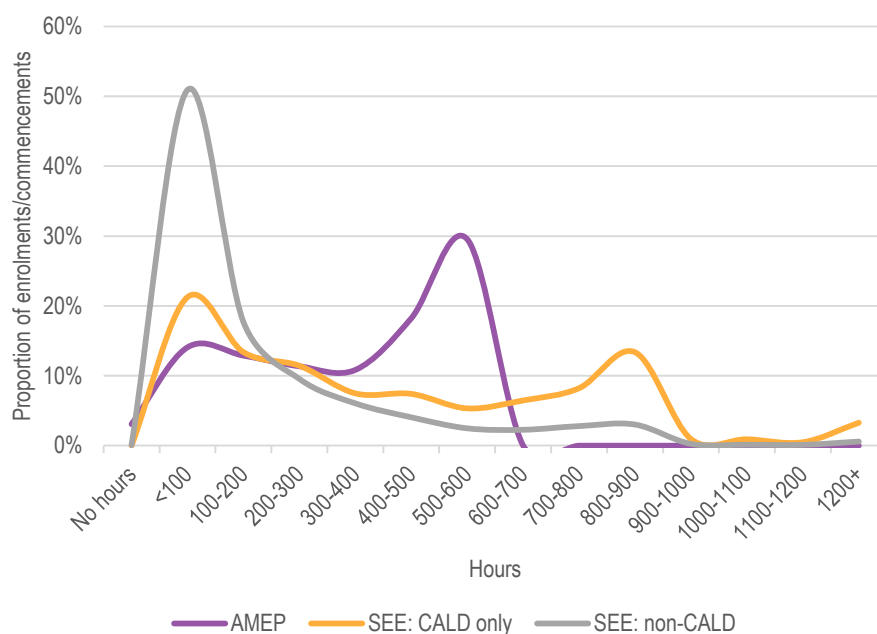
The tendency for migrant participants to remain engaged in the AMEP for longer is reflected in the participation patterns of CALD and non-CALD clients in the SEE programme. This is illustrated in Figure 8, which shows that:

- only 20 per cent of CALD clients spend 100 hours or less in the SEE programme; this is less than half of the rate for non-CALD clients (51 per cent)
- only 16 per cent of non-CALD clients spend more than 400 hours in the SEE programme and 46 per cent of CALD clients spent 400 hours or more in the SEE programme.

The average number of hours completed by a CALD participant in the SEE programme is 427 hours, compared to averages of 117 hours for Indigenous and non-CALD, and 217 hours non-Indigenous participants respectively.

This data shows that while participants tend to complete a larger proportion of their allocated hours in the AMEP compared to the SEE programme, when restricting the analysis to CALD participants in the SEE programme, a similarly high rate of retention is observed.

Figure 8 All AMEP and CALD SEE programme clients hours used



Note: AMEP and SEE programme clients that commenced in 2010-11 to 2012-13.

Source: AMEP dataset and SEE programme dataset

#### Key Finding 6

On average, AMEP participants tend to complete a larger proportion of their allocated hours compared to SEE programme participants.

However, within the SEE programme, CALD participants complete a similarly high proportion of allocated hours compared to non-CALD cohorts.

### 3.2 Employment outcomes and alignment with industry needs

As discussed in the respective evaluation reports, there are differences between the emphasis on employment outcomes and industry linkages between the two programmes.

- The SEE programme has a very strong emphasis on employment and job seekers' short-term opportunities, and the flexibility of the curriculum to allow for a wide variety of vocational units to be included, along with work experience.
- The AMEP has an emphasis on work readiness to the extent that it is an important part of the settlement of migrants, although work experience is limited to eligible participants. The level of language proficiency developed through the programme is capped to functional English. The AMEP is not a job seeker programme.

As discussed in the AMEP Evaluation Report, feedback from stakeholders consistently suggested that the AMEP does not meet the needs of some employment-focused migrants, with at least a proportion exiting before achieving sufficient levels of English language proficiency in order to find work or to commence in the SEE programme. This can create significant challenges for both providers and clients, particularly where there are a

proportion of clients that transition from the AMEP to the SEE programme and back to the AMEP as a result (see Section 3.3).

That being said, the data (see Table 2) suggests that the work experience component of the AMEP enjoys a higher rate of participation than the SEE programme.

- Approximately 4 per cent of all SEE programme participants engage in work experience for an average total duration of 36 hours (see the SEE Programme Evaluation Report).
- By comparison, approximately 9 per cent of all AMEP participants participate in the SLPET component of the programme and spend an average duration of 170 hours (see AMEP Evaluation Report).

The possible reasons for this and potential next steps are discussed in Section 4.3.

**Table 2 Approach to training for employment and work experience**

	The AMEP	The SEE programme
<b>Year introduced</b>	2008 (EPP/TEWR), 2011 (SLPET)	2008 (limited), 2013 (available to all participants)
<b>Curriculum flexibility</b>	CSWE mandatory curriculum framework	Flexibility to incorporate vocational units mapped to ACSF
<b>Work experience component</b>	SLPET comprises 200 hours of which up to 80 hours are in a workplace	A work experience placement cannot be longer than four consecutive weeks, and cannot be utilised for more than 12 weeks in total.
<b>Work experience eligibility</b>	Limited to those completing CSWE III (with some exemptions given)	Available to all clients
<b>Work experience take up rate</b>	9 per cent of clients	4 per cent of clients
<b>Work experience details</b>	9 per cent of AMEP clients undertake work experience	36 hours for work experience
<b>Funding approach</b>	Different funding rate	Part of standard funding rate

Source: AMEP dataset and SEE programme dataset

### Key Finding 7

Both programmes have a focus on employment outcomes:

- The SEE programme is much more focused on the short-term employment prospects of job seekers.
- AMEP contributes directly through SLPET and indirectly through attainment of functional English.

Consistent feedback from stakeholders suggests that the AMEP does not meet the needs of some employment-focused migrants, although employment is not the aim of the AMEP, as noted in the AMEP report. At proportion of AMEP employment-focused clients exit the programme before achieving sufficient levels of English language proficiency in order to find work or to commence in the SEE programme.

That being said however, the data show that the work experience component of the AMEP enjoys a higher rate of participation than the SEE programme.

## 3.3 Programme pathways

### 3.3.1 Pathways between the AMEP and the SEE programme

Given the higher levels of skills catered to by the SEE programme, and the fact that the AMEP is intended to be undertaken in the period immediately following an individual arriving

in Australia, it is generally considered that for those who are eligible, the AMEP is the precursor to the SEE programme. Participants that move from the AMEP into the SEE programme may do so:

- Because they consider that the SEE programme will better meet their needs, especially for those migrants that are employment-focused
- Because they have exhausted their AMEP hours
- Because they are no longer eligible for the AMEP.

It is also possible that some participants eligible for the AMEP never participate, and commence directly in the SEE programme when they become an eligible job seeker. The feedback from stakeholders suggest that this is generally unlikely given that the AMEP enjoys a high degree of public recognition and is well publicised amongst migrant and refugee communities.

As noted in Section 2.4, records are not kept of the number of AMEP participants that move into the SEE programme. There are two views on the appropriateness of AMEP participants transitioning into the SEE programme (or other training for that matter).

First, some stakeholders and most AMEP service providers are of the view that it is in the client's best interest for them to maximise the use of their AMEP entitlement before moving into the SEE programme, on the grounds that:

- Clients should make full use of the entitlement afforded to them under the AMEP rather than allowing it to expire.
- This will ensure that participants have sufficient LLN skills to “achieve the optimum benefit from the SEE programme” (AMEP service provider confidential submission).
- All settlement issues should be dealt with via the AMEP prior to engaging in other activities.

As one submissions noted, in the past there had been a requirement for SEE programme participants to have first completed 460 hours of their AMEP entitlement:

Under the previous model, AMEP clients were required to complete 460 hours in the AMEP before transitioning into the SEE programme. This previous mandatory requirement has been lifted under the current business model and has resulted in clients moving between the two programs.

*– AMEP service provider confidential submission*

SEE providers consider the flexibility to move into the SEE programme to be appropriate, as it allows the client the opportunity to choose the programme that best meets its needs.

...(the) ability to move to SEE prior to finishing AMEP hours has improved options for clients who want to fast track to employment. This is because in SEE there is the opportunity to gain formal qualifications and a stronger focus on LLN contextualized in the workplace.

*GoTAFE, Chisholm Institute and LiE joint submission*

Currently, it is possible to do fewer than 510 hours before transitioning to SEE. This arrangement provides reasonable flexibility for job seekers with good language skills to move to SEE (if that is the support they are assessed as needing) without needing to complete the full 510 hours.

*– Jobs Australia submission*

As discussed in Section 2.2, AMEP participant eligibility for the SEE programme cannot be assumed and there are currently some inconsistencies in the criteria between the two programmes. There are practical considerations associated with whether the pathway from the AMEP into the SEE programme is indeed available for a given client.



Only some exiting AMEP clients are eligible for the SEE programme. Currently this means that those who may benefit from a pathway into the SEE need to go through a sometimes complex process to check eligibility and be referred. This can cause delay and disappointment for the client as well as the additional administrative burden for providers of AMEP, SEE and JSAs.

*Confidential submission*

For those participants who would seek to 'reverse articulate' from the SEE programme into the AMEP, most would agree that it would be preferable to avoid such a pathway altogether. The AMEP is primarily seen as supporting those in need of basic language and settlement. There are however no data available to quantify the extent to which movement from the SEE programme into the AMEP takes place.

#### Key Finding 8

It is generally accepted that for eligible clients, the AMEP is the precursor to the SEE programme, however there are no formal processes or pathways from the AMEP to the SEE programme.

There are no data available on the proportion of AMEP participants that move into the SEE programme, or vice versa.

### 3.3.2 Pathways in dual AMEP-SEE providers

To date, given that the two programmes have been managed in separate portfolios, the AMEP and SEE programmes have run separate tender processes. As Figure 9 shows, the two programmes have appointed different providers:

- The AMEP has appointed 11 providers, which in turn engage 55 subcontractors
- The SEE programme has appointed 65 providers across 146 SDAs.

Including both primary and subcontractors, there are an estimated 15 providers of both programmes although there may also be SEE providers and providers within a consortia for one programme that also deliver in the other.

Stakeholders and programme participants report that where there is a dual AMEP-SEE provider, there are clear benefits for clients and providers.

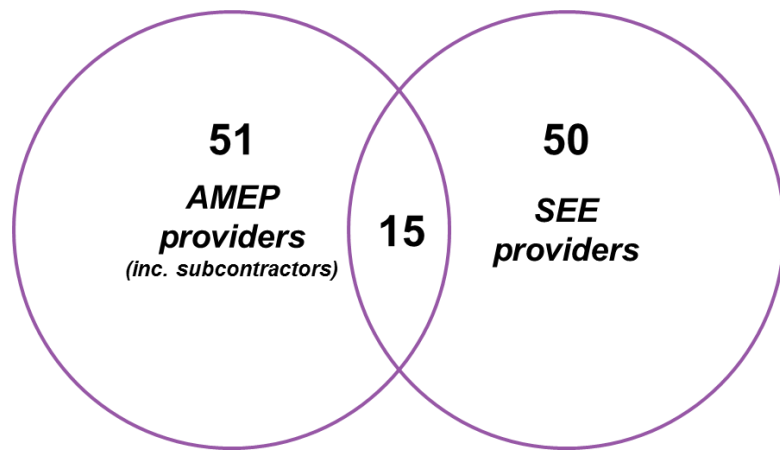
- There tends to be a better understanding of both programmes and pathways between the programmes are clearer.
- Clients are encouraged to use up their AMEP allocation prior to progressing to the SEE programme.
- Where there is a transition to the SEE programme after the AMEP, clients have the benefit of remaining at the same campus environment the same classmates.

From the provider's perspective, there are benefits from economies of scale and scope in delivering both the AMEP and the SEE programme, although some aspects, such as reporting, still require two separate systems to be in place.

Given the likely overlap in eligible clients discussed in Section 2.4, by comparison, there appears to be substantially less overlap in the providers delivering across both programmes than one would expect. This is also surprising given that both programmes have appointed fewer providers than there are contracts.

While the two programmes have distinct objectives and approaches, the commonality in the delivery of English language training to CALD cohorts would suggest that there is opportunity for both clients and providers to enjoy the benefits of increased provider crossover between the AMEP and the SEE programme (without compromising the diversity of providers in either programme).

Figure 9 AMEP and SEE providers and subcontractors



Source: AMEP and SEE programme documentation

#### Key Finding 9

While the participants in both programmes share similar characteristics and learning needs, there appears to be limited overlap in the providers delivering across both programmes.

Where there is a dual AMEP-SEE provider, benefits were reported for both clients and providers. While the two programmes have distinct objectives and approaches, the commonality in the delivery of English language training to CALD cohorts suggests that increases in the overlap in providers delivering both programmes would be beneficial.

## 4 Opportunities to improve client outcomes

### 4.1 Addressing the eligibility gap

As discussed in Section 2.2, there are clear eligibility gaps between the AMEP and the SEE programme. Most of these gaps – in particular those relating to the requirement that SEE programme clients are in receipt of income support and receive a referral from another agency – can be explained by the deliberate targeting of each programme.

However, while those that arrive in Australia under the skilled migrant stream are eligible for the AMEP they are specifically excluded from participating in the SEE programme.

There are insufficient data to assess the likely impact of extending the SEE programme to skilled migrants. However, based on the fact that skilled migrants comprised 17 per cent of AMEP participants in 2013-14, allowing skilled migrants to participate in the SEE programme could see a significant increase in enrolments into the programme.

The inclusion of skilled migrants – in particular dependents of the primary applicant – would target genuine need given that participation in the programme requires a significant commitment from participants, and it is likely that only those requiring genuine LLN training would seek to enrol in the programme.

The rationale for excluding skilled migrants – including dependents – from the SEE programme is unclear. If skilled migrants become eligible job seekers and are in need of LLN training to achieve success in employment or further training, there is a case on equity grounds for allowing these residents equal access to the SEE programme.

#### Recommendation 1

Further investigation should be carried out on whether the dependents of skilled migrants should be eligible for the SEE programme. This should look at both the financial implications of widening the SEE programme eligibility and the potential positive economic impact of this cohort being able to better integrate into the workforce.



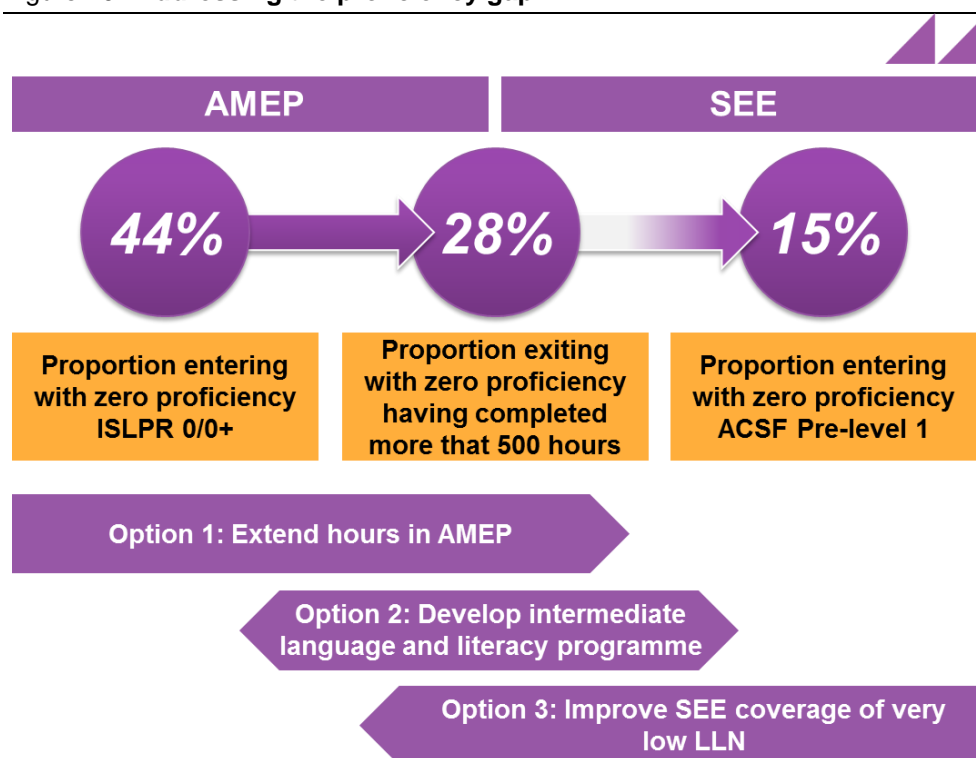
### 4.2 Addressing the proficiency gap

Many stakeholders and focus group participants from both programmes have highlighted the fact that clients who complete their 510 hour allocation may exit the programme with a low level of English competency.

As depicted in Figure 10, the high proportion of those entering the AMEP with zero proficiency and that subsequently exit the AMEP with very low language skills may form the large proportion entering the SEE programme at pre-level 1 skills on the ACSF.

If these clients then seek to enter the SEE programme they face a 'proficiency gap' in that they may not be able to benefit from the programme given their very low level of English language proficiency. Issues regarding the SEE programme and its ability to accommodate the needs of very low LLN clients are discussed in more detail in the SEE Programme Evaluation Report.

Figure 10 Addressing the proficiency gap



Source: AMEP dataset and SEE programme dataset

Possible options (in no particular order) to address the proficiency gap depicted in Figure 10 are:

- *Option 1: Extending hours in the AMEP* in order to ensure fewer numbers of AMEP participants exit at ISLPR 0/0+. If AMEP participants exiting the programme were able to achieve the target level of functional English, the issue of SEE programme participants commencing at pre-level 1 would be significantly reduced. However, there are conceptual and practical issues around selecting an appropriate allocation of hours that supports delivery of the programme objectives; these are discussed at length in the AMEP Evaluation Report. In addition, expansion of the AMEP would not cater to non-migrants with significant LLN needs, or those whose eligibility to the AMEP has been exhausted or has elapsed.
- *Option 2: Developing an intermediate language and literacy programme*, which could include state-based LLN programmes that are generally available through the broader VET system. An extension of existing programmes would be preferred over an additional Commonwealth programme in this regard.
- *Option 3: Improve SEE programme coverage of those with very low LLN*. As discussed in the SEE Programme Evaluation Report, whether or not the programme is intended to support those with very low LLN skills is unclear. Amending the programme design to better accommodate this cohort could effectively address the proficiency gap issue.

Some stakeholders have suggested that the two programmes could be integrated and “redesigned as an overarching programme with delivery streams for different cohorts depending on their learning needs and community access requirements”. While there is some justification for having “a streamlined service which takes clients from survival English through to workplace language and employability skills in a seamless transition” (MTC submission), it faces a number of practical issues. First, it risks conflating and confusing the current distinct and clear objectives of the two programmes. Second, it would render more difficult the management and operation of the two programmes as distinct areas of policy.

The links between AMEP and SEE need to be strengthened, while retaining the distinct focus of each program. There are gaps and differences in eligibility between the programs which can make a coordinated approach difficult.

– SCOA submission

Consistent with the recommendations in both the AMEP Evaluation Report and the SEE Programme Evaluation Report, further consideration of whether this very low LLN group should be assisted through either expanding or changing the SEE programme target cohort is needed.

Modifying the SEE programme to explicitly include very low LLN clients could increase the cost of the programme. While the SEE programme expenditure is capped, very low LLN clients would have higher needs and therefore would likely require greater resources than the current SEE programme target groups. Another issue to consider in any SEE programme expansion includes the roles of the Australian Government and states and territories in providing LLN training.

#### Recommendation 2

There are gaps in the development of client language and literacy proficiency which sees some very low LLN skilled clients unable to transition from the AMEP into the SEE programme. Further consideration is needed of whether this very low LLN group should be assisted through either expanding or changing the SEE programme's target cohort. This will need to consider the roles of the Australian Government and states and territories, the potential costs of change (noting the higher needs and thus cost of assisting this group), and the potential benefits of growing the pool of migrants with higher LLN skills.



## 4.3 Improving transitions to employment

### *Increasing participation in work experience*

As discussed in Section 3.2, the data show that the work experience component of the AMEP has a higher rate of participation than the SEE programme, even though the SEE programme is designed to have a more direct impact on participant employability and transitions into jobs. Consistent feedback from stakeholders suggest that the AMEP does not meet the needs of some employment-focused migrants, with at least a proportion exiting the programme early to work or commence in the SEE programme.

There are a range of possible explanations for the lower proportion of SEE programme participants engaging in work experience:

1. *Participant interests in gaining work experience* – as recent arrivals, AMEP clients generally have had only limited opportunity to work in Australia and as such SLPET would be considered a highly attractive opportunity to get some exposure to employment. As job seekers, SEE programme clients are likely to have already held jobs in Australia.
2. *Opportunities available for work experience* – as discussed above, as part of their status as job seekers receiving income support, SEE programme participants generally have access to a much wider range of training and employment opportunities, including paid employment. Paid employment outside of the SEE programme may generally be considered to be more attractive than work experience within the programme, and as discussed in the SEE Programme Evaluation Report, may often be the reason for exiting the programme.

3. *Factors relating to programme design* – some dual providers have suggested that SEE programme participants would benefit from a more structured focused on transitions into employment, similar to the SLPET subcomponent of the AMEP.
4. *Factors relating to the funding model* – under the AMEP, the SLPET subcomponent attracts a higher rate of funding and provides access to significant additional hours of training, which would be attractive to clients and providers alike. No such incentives exist for the SEE programme, given that the same rate of funding applies for work experience as classroom training.

There are insufficient data and evidence available to determine the relative contribution of these various factors on SEE programme participants and their sub-cohorts (including CALD participants who may have more in common with AMEP participants). Given the significant difference between the participation rates in work experience, further research is warranted to determine the extent to which the lower rates of work experience in the SEE programme may be remedied through changes in the SEE programme design, including the potential to adopt effective features from the design and implementation of the AMEP.

#### Recommendation 3

Further research is warranted to determine the extent to which the lower rates of work experience in the SEE programme may be addressed through changes in the SEE programme design, including the potential to adopt effective features from the design and implementation of the AMEP.

## 4.4 Addressing the gaps in pathways

There are currently no formal pathways between the AMEP and the SEE programme, and vice versa, and insufficient data available to quantify the extent of actual flows between the two programmes. As discussed in Section 3.3.1, it is generally accepted that for eligible clients, the AMEP is the precursor to the SEE programme. Some providers and stakeholders propose that clearer processes are required, including explicit requirements for participants to first exhaust their AMEP entitlement before progressing to the SEE programme.

On balance, it would appear that while a formal process would be beneficial, this should not be so prescriptive as to unduly limit client choice. As some SEE providers have identified, flexibility to move into the SEE programme regardless of their previous participation in the AMEP allows the client the opportunity to choose the programme that best meets their needs. A formal process implemented at the commencement of the SEE programme would be sufficient to ensure that 'reverse articulation' from the SEE programme to the AMEP is minimised.

Such a process could work best if it were integrated with the current referral process such that:

1. Eligible job seekers would present at a referring agency with LLN needs.
2. The referring agency would ascertain whether the client is eligible for the AMEP, the SEE programme or both.
3. If eligible for both, the referring agency would have the information necessary to present both options to the client, including the relative benefits and emphasis of each programme, and the available providers for each programme. Where a client has clear settlement issues that have not been addressed, the referring agency would recommend participation in the AMEP prior to enrolment in the SEE programme.

4. The client would select the preferred programme and provider based on their personal needs and circumstances.

This formal process would need to be developed further and integrated with the communications and administrative systems rolled out to referring agencies as part of any other changes to the SEE programme referrals process.

In relation to the gaps in the data on pathways between the AMEP and the SEE programme, the forthcoming introduction of the Unique Student Identifier (USI) presents an ideal opportunity to ensure that the use of pathways between the AMEP and the SEE programme, as well as in/out of other VET programmes can be quantified and better understood.

All Registered Training Organisations will be required to comply with the introduction of the USI where they are delivering a nationally accredited VET qualification and as such: AMEP service providers would be required to report CSWE attainments and completions; and SEE providers would be required to report accredited VET attainments and completions. In this respect, AMEP and SEE programme administrators may not be required to take any action apart from ensuring that providers understand their obligations to report AMEP and SEE programme training against the USI protocols.

#### Recommendation 4

Establishing formal processes or pathways for transitions between the AMEP and the SEE programme would be beneficial, but should not be so prescriptive as to limit client choice of the programme that best meets their needs.

The AMEP and SEE programme administrators should ensure that providers understand their obligations to report the AMEP and SEE programme training against the forthcoming USI protocols to ensure better data on articulation between the programmes.

## 4.5 Opportunities for aligning providers and provider management

### 4.5.1 Providers in common

As discussed in Section 3.3.2, the commonality in the delivery of English language training to CALD cohorts would suggest that there is opportunity for a higher degree of provider crossover between the AMEP and the SEE programme. This would deliver clear benefits for both students and providers.

As discussed above, the independent administration of the two programmes should be retained, but a greater level of provider overlap could be encouraged by inviting approved AMEP service providers to apply to be a SEE provider and vice versa. This would not grant automatic approval to providers looking to expand their delivery in one programme or the other, but rather highlight to providers the prospects for economies of scale and scope, and the likely positive contribution to the experience of students. The level of provider crossover would be increased if the recommendation in the AMEP Evaluation Report to adopt a multi-provider model similar to the approach taken in the SEE programme is adopted.

In the interest of minimising the regulatory burden and the costs of programme administration, steps could also be taken to better integrate the generic provider requirements across the two programmes, for example any requirements in relation to incorporation, insurance, financials, OH&S, probity and sustainability policies. Similarly, the

duplication with other external systems, such as ASQA registration and NEAS accreditation, should be minimised.

Ideally, the satisfaction of generic requirements in one programme should be recognised as sufficient to meet the same/similar requirements in the other programme. In the same way, a positive rating, performance and contract extension in one programme should count towards the applications made in the other programme.

#### Recommendation 5

A greater level of providers in common between the two programmes could be encouraged by co-inviting approved AMEP service providers and SEE providers for the other programme; this does not mean granting automatic approval to providers looking to expand their delivery, but rather highlighting to providers the prospects for economies of scale and scope, and the likely positive contribution to the experience of clients.

Options could also be investigated for administrative synergies through co-recognition of provider characteristics across the two programmes.



## 4.6 Addressing the differences in the curriculum and benchmark instruments

### *Integration with longer term language and literacy instruments and benchmarks*

In considering the longer-term study aspirations of both AMEP and SEE programme clients, the question arises as to whether improved integration between the instruments and curriculum of both programmes – ISLPR and CSWE in AMEP and ACSF in the SEE programme – with other language and literacy instruments and benchmarks could be achieved.

Some stakeholders noted differences between the two programmes that undermine the potential benefits of continuity for learners who move between the two programmes, as well as other VET courses. In Canada for example, the Canadian Language Benchmarks (CLB) are used to test language learning for adults in many adult ESL programmes throughout the country. This means that those participating in LINC (the equivalent programme to the AMEP) can then transition into other programmes using the same benchmark instrument. This allows for benefits of consistency, familiarity and continuity for both learners and providers.

Given its position as the primary benchmark for language and literacy (as well as numeracy) in the Australian VET sector, the Australian Core Skills Framework (ACSF) would most likely provide the greatest continuity and coverage from a national perspective. However, there is insufficient evidence to definitively say whether the ACSF would be as appropriate for migrant cohorts to test second language proficiency, compared to the ISLPR and CSWE curriculum framework.

Some providers suggest that the different instruments used for the AMEP and the SEE programme are appropriate to the specific purposes of each programme.

Currently AMEP uses ISLPR as an initial assessment and placement tool and CSWE Learning outcomes at course completion. The SEE program uses the Australian Core Skills Framework (ACSF) as the initial assessment and placement tool as well as to assess outcomes. Each is appropriate to the different program purposes.

– AMEP service provider confidential submission



The differences in curriculum between the two programmes may be overstated given that many providers only deliver one of the programmes and therefore may not have explored the possibility of improving the alignment, as well as that providers can opt to deliver training through the CSWE curriculum framework under the SEE programme.

Other than adopting a single benchmark instrument as per the Canadian model, a possible alternative to achieve greater integration and continuity between the AMEP and other longer-term benchmarks is to undertake a formal mapping of benchmarks across relevant instruments. It is understood that the Department has commissioned a consortium of national experts to undertake formal mapping of the ACSF to the ISLPR and the CSWE curriculum framework. Subject to the outcomes of this research, consideration should be given to formally adopting the mapping framework to facilitate greater continuity between the instruments and benchmarks used in the AMEP with other training programmes and the tertiary education sector more broadly. The government will also then be in a position to consider the extent to which other Training Package units, such as the Foundation Skills Training Package which are already mapped to the ACSF could be used alongside the CSWE curriculum.

#### Recommendation 6

Building on the recent research mapping the ACSF to the ISLPR and the CSWE curriculum framework, the Australian Government should consider formally adopting the mapping framework to facilitate greater pathways between the AMEP and other training programmes, and the tertiary education sector more broadly.

Similarly, the Australian Government should consider the extent to which other Training Package units which are already mapped to the ACSF could be used alongside the CSWE curriculum framework.

## 5 Strengthening the strategic alignment of the AMEP and the SEE programme

### 5.1 Context for alignment

Both the AMEP and SEE evaluations have acknowledged these distinct programmes with different objectives and target groups. Historically, they have resided in separate government portfolios with limited formal connections between the two programmes.

The AMEP has been a comparatively much longer-lived and relatively stable programme. The providers currently contracted to deliver the programme have been involved in doing so for many decades. The SEE programme is a more recent programme that has undergone various iterations (as the LANT programme and then LLNP).

The AMEP has largely been managed and refined within the immigration portfolio, whereas the SEE programme has been much more connected to developments in the broader VET sector, having resided within the industry or education portfolios in recent years.

Over the years, the improvements that have been made to each programme have occurred independently and this evaluation therefore presents a unique opportunity to improve the strategic alignment between the two programmes, but also within the broader suites of skills policies and programmes nationally.

### 5.2 Recent developments in skills policies and programmes in Australia

#### *The role of government in education and training*

The contemporary economic rationale for government investment in education and training emerges from the long established concept of human capital development, but also from more recent 'new growth' economic theory, which recognises the importance of the growth of knowledge while ensuring that its benefits are widely shared.

Public investment in education and training is seen as an essential input to economic growth by ensuring that firms have access to skilled labour. While there are private returns to individuals and enterprises, spill over benefits to the economy and society more generally are seen to justify government subsidies.

If investment in VET is left purely to private investment decisions by individuals and enterprises there are high risks of market failure.

- For individuals, there is likely to be suboptimal investment in training, because the full costs of investment in many courses are not seen as likely to result in reasonable private rates of return, particularly given the high upfront costs.
- Firms are also likely to invest less than the economically efficient level due to the risk that other firms who do not invest in workforce training will use their cost advantage to recruit skilled workers from those who do invest (the free rider problem).

In Australia, public investment in VET was limited to public providers until the early 1990s when the concept of the training market emerged. The central role of the public providers in the delivery of the AMEP – in particular AMES in NSW and Victoria up to the present day – reflect this historical approach.

The concept of a training market was designed in parallel with government's role in purchasing training programmes (as distinct from the delivery of training programmes) and the objective of increasing the range of providers and driving responsiveness and efficiency through competition between providers.

### *Recent trends in education and training policy*

The introduction of User Choice for apprenticeships and traineeships from 1997 through to the current state-based interpretations of the 2012 National Partnership Agreement for Skills Reform are part of a significant and ongoing transition for Australia's tertiary sector away from profile funding and competitive tendering towards funding models premised on increased competition and client choice.

In its policy review of VET in Australia (2008) the OECD argued for a shift from a forecasting and planned supply VET funding model in Australia to an entitlement model driven by individual and enterprise choice. A similar rationale was advanced by the Bradley Review in relation to the uncapping of funding for subsidised undergraduate courses in higher education.

The *Victorian Training Guarantee* and South Australia's *Skills for All* represent the first full implementation of a VET student entitlement model for Australia, with other states following suit (Queensland in mid-2014 and NSW in 2015) in line with the commitments to an entitlement up to Certificate III in the National Partnership Agreement for Skills Reform.

More recently, the significant reforms to higher education currently being debated in the Australian Parliament, including the extension of demand driven funding to sub-bachelor places and non-university higher education providers, along with full fee deregulation, are poised to further advance the principles of competition and choice across the tertiary sector.

It is worth noting that these trends span not just the education and training sector but a range of other areas of service delivery where government had previously been a provider, including employment services, disability services and humanitarian settlement services.

### *Recent changes to Commonwealth Government policies and programmes in VET*

Recent announcements in the area of VET reform nationally include significant reductions in Commonwealth expenditure on VET through the consolidation of various programmes including the National Workforce Development Fund, various apprenticeship support programmes, and the Workplace English Language and Literacy programme amongst others, which are to be replaced by the Industry Skills Fund.

There are various system level changes underway including the closure of the Australian Workforce and Productivity Agency and the AQF Council, the future role for Industry Skills Councils with the move to competitively tender out responsibility for Training Package development, and changes to the Australian Skills Quality Authority's approach to regulation.

These changes are underpinned by the current government's VET reform vision outlined in Box 1.

**Box 1 The VET reform vision**

On 3 April 2014 the Hon Ian Macfarlane MP, Minister for Industry, chaired the inaugural meeting of the Council of Australian Governments (COAG) Industry and Skills Council, attended by state and territory ministers.

Australian government ministers made a commitment to ensuring industry has the skilled workforce and operating environment it needs to boost the nation's productivity and increase international competitiveness.

Ministers agreed on six objectives for reform of the Vocational Education and Training (VET) system:

1. A national VET system which is governed effectively with clear roles and responsibilities for industry, the Commonwealth and the states and territories
2. A national system of streamlined industry-defined qualifications that is able to respond flexibly to major national and state priorities and emerging areas of skills need
3. Trade apprenticeships that are appropriately valued and utilised as a career pathway
4. A modern and responsive national regulatory system that applies a risk-management approach and supports a competitive and well-functioning market
5. Informed consumers who have access to the information they need to make choices about providers and training that meets their needs
6. Targeted and efficient government funding that considers inconsistencies between jurisdictions or disruption to the fee-for-service market.

Source: <http://vetreform.industry.gov.au/vet-reform-vision>

Although the focus on employment outcomes aligned with industry needs has been a core part of VET policy for a number of decades, current government policies and principles have given this even greater emphasis and priority. This was reflected in the initial machinery of government changes in 2013, which saw responsibility for VET being moved into the industry portfolio, although it returned to the Department of Education and Training at the end of 2014. The importance of education and training and a skilled labour force for industry is also highlighted in the Government's Industry Innovation and Competitiveness Agenda (2014).

## 5.3 Strengthening the strategic alignment of the AMEP and SEE programme with government policy

### 5.3.1 Focus on industry-relevant training and employment outcomes

Both the AMEP and SEE programme currently have a substantial focus on industry-relevant training and appropriate employment outcomes for clients. The SEE programme has an explicit and direct focus on achieving employment for eligible job seekers, while the AMEP recognises that engaging in the labour market is pivotal to successful settlement. This is especially apparent in the delivery of vocational units as part of the training in both programmes, and the opportunity to gain work experience; though, as highlighted in Section 3.2, the work experience component of the AMEP has a higher rate of participation than the SEE programme.

The AMEP Evaluation Report discusses the tension between the programme's focus on settlement versus employment and notes stakeholder concerns that an increasing emphasis on employment and economic participation may risk gradual displacement of the programme's primary objective of settlement.

Similarly the SEE Programme Evaluation Report raises the tension between the long-term investment in LLN versus the short-term focus on job outcomes. While these objectives are not mutually exclusive, stakeholders reported that the current approach to employment services and income support means that immediate employment opportunities could displace the long-term commitment required to improve on individuals language, literacy, or numeracy skills.

In both these cases, the fact that there are tensions that exist within both programmes highlights the fact that both the AMEP and the SEE programme are multi-dimensional policies that seek to be adaptable to the needs and priorities of the individual, whilst serving more than one public policy objective. The pursuit of industry-relevant training and employment outcomes should not be at the expense of the more diverse set of policy objectives, nor should it neglect the needs of the individual.

#### Recommendation 7

Both the AMEP and the SEE programme are multi-dimensional programmes serving more than one public policy objective and seek to be adaptable to the needs and priorities of the individual. Any future changes to either programme to improve the delivery of industry-relevant training and employment outcomes should not compromise the diverse policy objectives of the AMEP and the SEE programme, nor should they neglect the needs of the individual.

### 5.3.2 Consistency with market reforms and student choice

The current approach to competitive tendering under both the AMEP and the SEE programme is consistent with the policy recommendations outlined in Hilmer's National Competition Policy Review (1993) and the subsequent adoption of competitive principles adopted by COAG in the mid-1990s.

- The competitive tendering of the AMEP since 1997 is consistent with the broader transition in the role of government in VET from provider to purchaser.
- The implementation of a multi-provider model in the latest SEE programme contracting round where students and referring agencies have the choice of two or more providers appointed in a given region is consistent with the broader market reforms being introduced across the VET sector.

Greater competition between providers and improved client choice is expected to lead to:

- Improved marketing and engagement with prospective eligible migrants.
- Increased partnerships that better enable providers to meet client needs.
- Improved regional access and delivery.
- More targeted models of training delivery.
- Specialist providers and models that cater to specific client cohorts.
- Unpredictable client-focused innovation.
- Reduced contract management requirements and contractual specificity (thereby increasing flexibility).

However, given the large number of vulnerable and/or non-English speaking clients that make up the participants of both the AMEP and SEE programme, as well as the experiences of jurisdictions who have 'opened' up their contracted providers, it is important that the quality standards and ongoing reporting and monitoring regimes for providers contracted to deliver these programmes remain necessarily high.

That being said, however, and as outlined in the AMEP Evaluation Report, the next step in the evolution of the AMEP purchasing model should be the phased introduction of contractual arrangements that include two or more providers competing in a given region. Similarly, the SEE Programme Evaluation Report outlines how the design and operation of the multi-provider model in the SEE programme could be improved.

#### Recommendation 8

Consistent with VET market reforms to increase client choice, and as outlined in the respective evaluation reports:

- the AMEP purchasing model should consider the phased introduction of contractual arrangements that include two or more AMEP service providers competing in a given region
- improvements to the design and operation of the multi-provider model in the SEE programme should be based on a framework for viable delivery.

Given that clients for both the AMEP and SEE programme comprise vulnerable and/or non-English speaking participants, both the AMEP and the SEE programme should ensure a necessarily high standard of providers contracted to deliver these programmes.

### 5.3.3 Implications of skills reform for the AMEP and the SEE programme

One of the agreed principles for VET reform is for a *national VET system which is governed effectively with clear roles and responsibilities for industry, the Commonwealth and the states and territories*. As discussed in Section 2.1, both the AMEP and the SEE programme are tied to areas of direct Australian Government responsibility; namely migration to Australia and the welfare support system respectively. State and territory governments on the other hand have carriage of the broader VET system.

As state and territory governments develop, implement and amend various entitlement models in line with their commitments set out the National Partnership Agreement for Skills Reform, the availability of publicly subsidised training is undergoing substantial change. There are two important implications of national skills reform for the AMEP and the SEE programme.

First, the introduction of a student-led entitlement model should in many cases allow individuals to follow up the AMEP and SEE programme training with further VET courses. In order for this to be effective, both AMEP and SEE programme clients will need to be well informed regarding their entitlement eligibility, pathways and options. Ideally, this would also allow AMEP and SEE programme participants to make informed choice regarding the vocational units or work experience that they undertake in order to better prepare them for further training. *Informed consumers who have access to the information they need to make choices about providers and training that meets their needs* is another of the agreed principles that will underpin VET reform in Australian in the coming years.

Second, ongoing changes to VET funding at the state level are likely to lead to a range of potential consequences on the availability of subsidised LLN training across the broader VET sector. To the extent that access to and/or availability of subsidised LLN programmes impacted, the AMEP and the SEE programme may come under pressure to fulfil a role that is more significant than is intended. Consistent with the advice in both the AMEP Evaluation Report and the SEE Programme Evaluation Report, programme participants should be well informed regarding their entitlement eligibility, pathways and options.

### Recommendation 9

There are two important implications of national skills reform for the AMEP and the SEE programme.

- The introduction of a student-led entitlement model is likely to allow individuals to follow up AMEP and SEE programme training with further VET courses.
- Potential changes to the availability of subsidised LLN programmes, is likely to place pressure on the AMEP and the SEE programme to fulfil a role that is beyond what is intended.

In both cases there should therefore be clear and consistent communication of the programmes' objectives to clients and stakeholders, with programme participants being well informed about their entitlement eligibility, pathways and options.



### 5.3.4 Risk based approaches to regulation

The Australian Government has placed significant emphasis on the importance of reducing the regulatory burden for businesses in Australia. The recent Industry Innovation and Competitiveness Agenda, for example, committed to pursuing “a lower cost, business friendly environment with less regulation, lower taxes and more competitive markets.”

In the agreed principles underpinning VET reform, the government similarly committed to a *modern and responsive national regulatory system that applies a risk-management approach and supports a competitive and well-functioning market*. Aspects of this approach have already been implemented with changes to how the national VET regulator – ASQA – goes about its role. Characteristics of this revised approach include:

- An earned autonomy model which allows high performing RTOs to manage their own scope of registration.
- The removal of financial viability risk assessments for existing providers.
- Streamlining of VET data reporting requirements.
- Implementation of a risk-based approach that identifies those factors most critical to ensuring quality outcomes for students, and targeting providers that pose the greatest risk to delivering those outcomes.

Calls from both AMEP and SEE providers for the reporting burden to be reduced should be considered alongside the Government’s agenda to reduce red tape. As such, programme administrators should carefully consider the options for streamlining the monitoring, reporting and performance management systems canvassed in the AMEP and SEE Programme Evaluation Reports, including any potential overlaps with ASQA and/or NEAS accreditation systems. Consideration should also be given to:

- Improving the alignment and consistency of provider performance management, reporting and compliance between the AMEP and SEE programme to both increase their effectiveness and minimise duplication for dual providers.
- Development of risk-based approaches to provider quality assurance and performance management consistent with the recent changes to the approaches taken in the regulation of the broader VET sector.

As a first step, the AMEP and SEE programme should jointly commission research and advice into both these areas. Any proposed improvements could then be developed and implemented in future contracting rounds.

#### Recommendation 10

In line with the Australian Government's agenda to reduce the regulatory burden, the AMEP and the SEE programme should consider options for streamlining their monitoring, reporting and performance management systems, as outlined in the AMEP Evaluation Report and the SEE Programme Evaluation Report.

This should include the expansion of risk-based approaches to provider quality assurance and performance management, consistent with the recent changes in the regulation of the broader VET sector.





## References

Department of Industry 2014, "Summary of Eligibility Criteria 2013-16", Available from <<http://www.industry.gov.au/skills/ProgrammesandAssistance/SEE/Pages/Summary-of-Eligibility-Criteria-2013-16.aspx>>, Accessed 3 December 2014.

## Appendix A Mapping outcomes to the Australian Core Skills Framework

The acronyms used in this appendix are as follows:

- ACSF: Australian Core Skills Framework
- CSWF: Certificate in Spoken and Written English
- IELTS: International English Language Testing System
- ISLPR: International Second Language Proficiency Ratings
- TOEFL: Test of English as a Foreign Language
- CLB: Canadian Language Benchmarks (English as a Second Language)
- CGEA: Certificate in General Education for Adults.

### Notes on preliminary mapping

- The SEE programme records student outcomes according to the ACSF while the AMEP maps attainment according to the CSWE.
- The CSWE and the CGEA have been mapped to the ACSF.
- IELTS has been informally mapped to CSWE.
- ISLPR, TOEFL and CLB are mapped to IELTS, not the ACSF, CSWE or CGEA.

### Proficiency requirements

The Department of Immigration and Border Protection accepts IELTS Level 6 for each of speaking, reading, listening and writing as proof of competency in English.

The equivalent programme to the AMEP in Canada is the Language Instruction for Newcomers to Canada (LINC) programme. Canadian citizenship requires applicants to meet at least CLB 4; exit from LINC is at CLB 6, attainment of citizenship or after three years participation (whichever is first).

Language requirements for licensed professions (accountancy, nursing, medicine, law etc.) usually require higher levels of attainment for admission to the profession. IELTS guidance on this matter indicates that Bands 7.5-9.0 are acceptable for academic courses such as medicine, law or language intensive courses such as linguistics, journalism etc. Level 7.0 is usually acceptable for all other higher education courses. Vocational training courses tend to require Levels 6.0 – 6.5.

### Sources of information

Main source of information on CSWE and ACSF concordance: AMES curriculum licence information at <http://ames.edu.au/curriculum-licences/cswe-licences.aspx>. Viewed 7 November 2014.

Mapping of CGEA to ACSF: Implementation guide: Certificates in General Education for Adults, Department of Education and Early Childhood Development, Melbourne, 2014.

<http://islpr.org/why-use-islpr/summary-of-islpr/>, viewed 10 November 2014

[http://www.ielts.org/institutions/test\\_format\\_and\\_results/ielts\\_band\\_scores.aspx](http://www.ielts.org/institutions/test_format_and_results/ielts_band_scores.aspx), viewed 10 November 2014

Canadian Language Benchmarks 2012 edition.

Table 3 Preliminary mapping of LLN and ESL courses and test bands to ACSF

Australian Core Skills Framework (ACSF)	Certificate in Spoken and Written English (CSWE)	International English Language Testing System (IELTS)	International Second Language Proficiency Ratings (ISLPR) General	Test of English as a Foreign Language (TEOFL)	Canadian Language Benchmarks	Certificate in General Education for Adults (CGEA)
Level 1	Preliminary Course in SWE (partial) Certificate I (broad)	0 Did not attempt test 1 Non user 2 Intermittent user	0 Zero proficiency 0+ Formulaic proficiency 1- Minimum 'creative' proficiency	0-8 9-18 19-29	CLB 1 Initial basic CLB 2 Developing basic	Course in Initial General Education for Adults (broad)
Level 2	Certificate II (broad)	3 Extremely limited user	1 Basic transactional proficiency	30-40	CLB 3 Adequate basic	Certificate I Introductory
Level 3	Certificate III (broad)	4 Limited user	1+ Transactional proficiency	41-52	CLB 4 Fluent basic	Certificate I
Level 4	Certificate IV (broad)	5 Modest user 6 Competent user 6.5	2 Basic social proficiency 2+ Social proficiency 3 Basic vocational proficiency 3+ Basic vocational proficiency plus	53-64 65-78	CLB 5 Initial intermediate CLB 6 Developing intermediate CLB 7 Adequate intermediate CLB 8 Fluent intermediate	Certificate II (broad) Certificate III (partial)
Level 5		7 Good user	4 Vocational proficiency	79-95	CLB 9 Initial advanced CLB 10 Developing advanced	Certificate III (broad)
		8 Very good user	4+ Advanced vocational proficiency	96-110	CLB 10 Developing advanced CLB 11 Adequate advanced	
		9 Expert user	5 Native level proficiency	111-120	CLB 11 Adequate advanced CLB 12 Fluent advanced	

Source: ACSF; <http://islpr.org/why-use-islpr/summary-of-islpr/>, viewed 10 November 2014; [http://www.ielts.org/institutions/test\\_format\\_and\\_results/ielts\\_band\\_scores.aspx](http://www.ielts.org/institutions/test_format_and_results/ielts_band_scores.aspx), viewed 10 November 2014; Canadian Language Benchmarks 2012 edition; *Implementation guidelines: Certificates in General Education for Adults*, DEECD 2014.

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