

# Department for Communities

## Response to “Review of the Adult Migrant English Program: Discussion Paper July 2008”

15 August 2008

### 1. Introduction

The Department for Communities (DfC) welcomes the opportunity to provide input into the Department for Immigration and Citizenship’s (DIAC’s) “Review of the Adult Migrant English Program: Discussion Paper July 2008” (the “Discussion Paper”). DfC congratulates the authors of the Discussion Paper for the high quality of the Discussion Paper including the options for improvement that it contains.

In developing this submission, DfC has consulted with a range of stakeholders, including organisations that deliver the AMEP, community organisations that assist migrants who access the AMEP or deliver other services to migrants, and staff from the Western Australian Department of Employment and Training (DET).

DfC believes that the future directions for the AMEP proposed in the Discussion Paper are likely to be significant improvements on current arrangements. DfC agrees with the proposals regarding:

- introduction of interim classes for new arrivals;
- increased linkages with employment services;
- provision of the AMEP in workplaces;
- improved reporting arrangements; and
- greater promotion of the AMEP.

DfC’s main concerns regarding the proposed new directions for the AMEP include:

- the potential for placement in the Settlement for Social Participation Pathway to disadvantage those, particularly women with children, who are directed towards it;
- the lack of recognition of the important role of AMEP counsellors in providing advice and support to clients relating to all aspects of settlement, as an inseparable element of providing vocational advice to clients; and
- the limited range of options for increasing the number of hours of AMEP entitlements.

These and other concerns are raised below in relation to the topic headings provided in the Discussion Paper. A full list of recommendations is included at Attachment A.

### 2. Overarching issues

#### 2.1 Relevance of the ongoing reviews of employment services and the Language, Literacy and Numeracy Program (LLNP)

DfC notes that the Department for Education, Employment and Workplace Relations (DEEWR) is currently conducting reviews of employment services and of the LLNP and believes that the findings of these reviews should be considered in this review of the AMEP. As the Discussion Paper notes, the AMEP, LLNP and employment services need to be delivered in a coordinated way to optimise the effectiveness and accessibility of services for new migrants and promote their social inclusion in Australia.

DfC considers that it is essential that the outcomes of the reviews of employment services and the LLNP be considered as part of the review of the AMEP, that the latter review cannot be fully comprehensive and effective if this does not occur, and that every effort should be made to coordinate the changes made to these services and programs. DfC believes that each of these reviews, or at least the present Discussion Paper, should have acknowledged the existence of the other reviews and specified that consideration will be given to the outcomes of those other reviews. DfC also believes that stakeholders should be advised that this will occur.

The Office of Multicultural Interests (OMI), an office within DfC, provided submissions to the reviews of employment services and the LLNP. DfC believes that these submissions are both relevant to the review of the AMEP. Copies of the submissions are provided as attachments to this submission.

DfC recommends that:

1. *DIAC consider the outcomes of the reviews of employment services and of the LLNP while determining the best way forward for the AMEP.*

## **2.2 Consideration of the special needs of AMEP clients with a disability**

Culturally and linguistically diverse (CaLD) clients with a disability, such as a learning impairment, mental illness or physical disability, may have special needs in accessing the AMEP. The Ethnic Disability Advocacy Centre in Western Australia has advised that more attention needs to be given to the needs of CaLD clients with a disability in the provision of English language training.

For example, CaLD clients with a disability may benefit from flexible delivery of the AMEP, access to assistive devices in the classroom, and/or delivery of AMEP in venues with universal access. CaLD clients with a disability may also be among those who would benefit most from the Home Tutor Scheme.

DfC recommends that:

2. *DIAC and AMEP providers give special consideration to meeting the needs of CaLD clients with a disability who seek to access the AMEP.*

## **2.3 Case management approach**

In its submission to the review of the LLNP, OMI proposed a case management approach to English language learning, in which new CaLD migrants are provided with case management throughout their engagement with English language programs and services (including AMEP, LLNP and the DEEWR-funded Workplace English Language And Literacy program (WELL)). In its submission, OMI argued that such an approach would greatly assist clients to identify and pursue an appropriate English language pathway and to negotiate the maze of services and programs available to them.

DfC accordingly maintains the importance of a case management approach that integrates career counselling and planning with advice on English language training. DfC also notes that the Individual Learner's Passports (ILPs) proposed in the Discussion Paper could form a valuable tool within a case management approach (see also section 4 below).

DfC recommends that:

3. *DIAC, in conjunction with DEEWR, introduce a case management approach to CaLD clients' access to English language training and that this integrates career counselling and planning with advice on English language training, for clients seeking employment.*
4. *DIAC work with DEEWR and providers of AMEP, LLNP and WELL to develop a seamless pathway between English language programs available to CaLD migrants.*

### 3. Creation of client pathways

“Are the two proposed pathways suitable for meeting client needs and avoiding a one size fits all approach? How can we best implement this proposal?”

#### 3.1 Target groups for proposed AMEP pathways

DfC supports the proposal to create two pathways within the AMEP, reflecting the different motivations of clients for learning English. DfC believes that clients’ motivation for learning English, rather than their membership of a particular target group, should be the basis for their choice of pathway.

At present the proposed target groups listed in Figure 4 are restricted to aged persons and parents with young children. This does not take account of the range of reasons why a client may not be in a position to seek employment or for whom placement in employment in the short-term is not a preferred option. For example, there is no reference to clients learning English for the purpose of accessing further education and training (although these are mentioned on p.15 of the Discussion Paper), or people who are not in a position to work due to responsibilities to care for parents, siblings, their spouse and/or children, or those who have a disability which compromises their ability to secure employment.

The attempt to provide an exhaustive list of categories of people to be included in each target group is cumbersome, and risks directing clients towards inappropriate pathways. Clients seeking to learn English for the purposes of employment, or further education or training, should be directed towards the SEPP; while those interested in English for general participation in Australian society should be directed towards the Settlement for Social Participation Pathway (SSPP). Clients should be clearly advised about each pathway, its purpose, and their options, so that they can make an informed choice.

DfC recommends that:

5. *DIAC redefine the criteria for client referral to pathways to focus directly on clients’ motivation for learning English.*

#### 3.2 Timing of allocation to a pathway

All AMEP clients need to learn English for the purposes of social participation, whether or not they intend to seek work. Immediate placement in the Settlement for Employment Participation Pathway (SEPP) is unlikely to have significant benefits in terms of employment outcomes for clients will little or no skill in English, and may detract from client’s acquisition of English necessary for social participation.

DfC therefore suggests that allocation to the SEPP or SSPP should not take place until after clients have completed the Certificate in Spoken and Written English (CSWE) II. This approach will ensure that all clients, whatever their motivation for learning English, will acquire sufficient English for social participation in their early months with the AMEP. (See also sections 3.3 and 15.1 for other considerations relevant to this recommendation.)

DfC recommends that:

6. *DIAC allocate clients to a pathway once they have completed CSWE II.*

#### 3.3 Need for further development of the SSPP

3.3.1 DfC notes that details of the SSPP are less well developed than for the SEPP. For example, the Discussion Paper does not mention whether clients in the SSPP will have access to AMEP counsellors to assist them plan their (non-vocational) English learning goals, and to provide other forms of advice and support. The design of the ILPs is focused on progress towards vocational rather than social goals.

Greater attention should be given to articulating the goals and delivery approach for the SSPP. For example, delivery of classes for this Pathway in informal community venues may

provide a less threatening environment for clients, and would enable use of childcare facilities associated with those venues (see 12.1 below).

3.3.2 Any increased focus on realigning the AMEP towards better outcomes for clients who are seeking work should not be at the expense of outcomes for clients who, for whatever reason, are not seeking work while enrolled in the Program. DfC is concerned that introduction of an SSPP that has not been well thought-out may inadvertently lead to lower English language achievements for clients in that pathway. For example, the Discussion Paper indicates that the focus of the SSPP will be primarily on spoken and aural English, suggesting that clients in the SSPP may leave the AMEP without making significant progress in reading and writing English.

DfC believes that the major outcome for SSPP clients, like all AMEP clients, should be attainment of Certificate III in Spoken and Written English. Clients who are not seeking employment may benefit from this attainment in different ways from those who seek to work, but still need basic English for participation and inclusion in many aspects of Australian society. For example, a parent who is not working is likely to be the key contact point for their children's schools, and needs good English skills to discuss their children's progress with staff and to read written communications from the school.

DfC recommends that:

7. *DIAC articulate further the goals and delivery approach for the SSPP.*
8. *DIAC ensure that the development of separate streams within the AMEP does not impact negatively in any way on the benefits offered to clients directed towards the SSPP.*
9. *DIAC reaffirm that the major outcome for all AMEP clients, whether in the SEPP or SSPP, be achievement of Certificate III in Spoken and Written English.*

### **3.4 Curriculum design permitting clients to move between SSPP and SEPP**

3.4.1 While reference is made in the Discussion Paper to needing flexibility to allow clients to transfer between the SSPP and the SEPP, no practical details are provided. DfC suggests that regular meetings between clients and counsellors could be used to review whether clients wish to make a transition.

3.4.2 Courses provided in both pathways also need to be designed to enable a transition between pathways; for example, CSWE 3 classes in the SEPP need to be accessible to a client who has completed CSWE 2 in the SSPP and has had no previous vocational support via the AMEP. DfC notes that the use of CSWE in both pathways, as recommended in section 15.1 below, would facilitate transition between pathways.

DfC recommends that:

10. *Counsellors meeting with clients in the SSPP regularly review whether clients wish to transition to the SEPP, and facilitate a transition accordingly.*
11. *DIAC and AMEP providers ensure that courses offered in the SEPP and SSPP enable clients to transition smoothly between them.*

## **4. Development of Individual AMEP Learners' Passports**

**“Is the development of an Individual AMEP Learner’s Passport a helpful way to assist clients understand the steps towards their goals, starting with the AMEP?”**

DfC believes that the concept of the Individual Learner’s Passport (ILP) has significant potential to assist AMEP clients in articulating their English language acquisition goals, but has some concerns regarding how the ILP system would be implemented.

#### **4.1 Relevance of the ILP to SSPP clients**

DfC notes that the ILP template focuses on acquisition of English for employment or further study purposes, for example, through references to interviews with a vocational counsellor. However, the ILP may not be appropriate for clients in the SSPP in its current form. The Discussion Paper does not indicate whether ILPs will be provided to those in the SSPP.

DfC believes that an ILP should be provided to clients in all AMEP pathways. Some clients in the SSPP will transition to the SEPP during their AMEP studies. Other clients in the SSPP may wish to seek work after completing their AMEP studies, and will benefit from having documentation of their progress and achievement in the AMEP.

DfC recommends that:

*12. ILPs be provided to AMEP clients in all pathways, and the ILP format be sufficiently flexible to be of use to clients in all pathways.*

#### **4.2 Format of the Individual Learner’s Passport (ILP)**

4.2.1 It is unclear from the Discussion Paper whether the ILP will be a hard copy document in the possession of the client, or whether it will be primarily an electronic document, with hard copies available to the client on request, including prior to the ILP being completed. For example, some clients may wish to obtain a copy for self-esteem purposes, or to show their progress. DfC recommends the latter option, both to ensure that the passport remains a living document, and to ensure that a backup of the passport is available in the case of loss.

4.2.2 Additional benefits would be afforded to other service providers if they could access ILPs through an online database, with privileges to access, enter or modify information determined by their role in relation to the client. Such an approach would facilitate information exchange among the various service organisations assisting clients. Care would, however, be needed to manage privacy and data security issues appropriately.

DfC recommends that:

*13. ILPs be developed primarily as electronic documents, with a copy provided to the client after each update, or on request.*

*14. DIAC give consideration to enabling access to ILPs for relevant service providers, for example through development of an online database of ILPs.*

#### **4.3 Potential of the ILP to assist other service providers to implement clients’ plans**

The Discussion Paper does not clarify whether the primary purpose of the ILP is to assist AMEP clients in understanding the steps towards their goals (as implied by the question on p.18 of the Discussion Paper), or to assist subsequent service providers to understand and help implement clients’ plans (as proposed on p.17).

While the ILP could potentially serve the latter purpose, DfC believes that its capacity to do so will be limited unless coordination between the AMEP and other service providers (particularly employment service providers) is significantly improved. This concern has been raised by the Western Australian Government at recent meetings of the Standing Committee on Immigration and Multicultural Affairs, where it has been noted that some employment service providers do not use the career plans developed by clients with advice from their AMEP counsellors. Recommendations in relation to this concern are included in section 6 below.

#### 4.4 Information stored in the ILP

4.4.1 The ILP could be of greater assistance in assisting clients in developing a plan for achieving their goals, and for informing other service providers, if it included space for documenting additional information relevant to those goals such as any prior qualifications the client has obtained, and the recognition status of those qualifications in Australia.

4.4.2 Given that information in a client's ILP can be accessed by other service providers, care should be taken to ensure that it does not contain sensitive personal information, such as information about a history of trauma or torture.

Consideration should also be given to the best means of ensuring that client information that is not personal but that may nevertheless be sensitive and not required by other service providers is not shared with them. For example, information about the client's progress against AMEP milestones, or their satisfaction with the AMEP, is unlikely to be of great relevance to employment service providers. One way of dealing with this concern would be to allow clients to request that some categories of information stored in the ILP remain confidential.

DfC recommends that:

15. *ILPs provide space for including additional information agreed to be relevant to a client's pathway, such as details of qualifications, and whether the qualifications have been recognised in Australia.*

16. *DIAC consider the best means by which to ensure that any information stored in the ILP that may be sensitive is treated as confidential and not shared with other service providers where this is not necessary.*

## 5. AMEP counsellors

**“Do you consider the use of AMEP counsellors within the AMEP to be important in assisting clients not eligible for Australian Government Employment Services with vocational/employment guidance? How can we best do this?”**

### 5.1 Role of AMEP counsellors

5.1.1 DfC notes that the only reference to AMEP counsellors in the Discussion Paper is in relation to vocational counselling. DfC believes that the role of AMEP counsellors should not be solely to provide vocational counselling, and should continue to encompass provision of advice and counselling on all settlement-related issues.

While provision of vocational counselling services is their primary role, AMEP counsellors provide assistance on a range of settlement issues that impact critically on clients' attendance and achievement in the AMEP. Issues include adapting to a new culture, managing practical tasks life in a new country, coping with changed family circumstances, and recovery from trauma experienced prior to arrival in Australia. DfC considers that settlement-related counselling is vital to clients' success in education, training and employment.

5.1.2 Active information sharing between AMEP providers and relevant State and Federal Government departments (DIAC, DEEWR, and their State and Territory counterparts) will be important to ensure that AMEP vocational counsellors can stay informed about relevant services and programs. Consultations conducted by DfC as part of its submission to the review of LLNP indicated that some AMEP providers are unaware of the LLNP and WELL, and so may not refer clients to these programs.

DfC recommends that:

17. *AMEP counsellors continue to provide counselling across the range of settlement issues, to clients in both the SSPS and the SEPP.*
18. *DIAC, in conjunction with AMEP providers, consider the most appropriate means to ensure that AMEP counsellors assisting clients in the SEPP are well informed about available services and programs.*
19. *DIAC, in conjunction with DEEWR, AMEP providers, and relevant State Government departments, consider the best means to ensure active information sharing between AMEP providers and relevant State and Federal Government departments regarding services and programs relevant to AMEP clients.*

## **5.2 Minimum qualification of counsellors**

Counsellors working at the AMEP should have suitable minimum qualifications to enable them to provide settlement-related advice and support, as well as vocational advice. Based on consultations with several organisations that provide counselling, support or career guidance to new CaLD migrants, DfC has found that such organisations generally require counsellors, including vocational or career guidance counsellors, to have a qualification in psychology. Some organisations whose counsellors work in advocacy roles also engage people with a qualification in social work or social sciences. Based on this advice, DfC believes that DIAC should give consideration to the qualification requirements for AMEP counsellors, to ensure that they are qualified to assist clients with all settlement-related issues.

DfC recommends that:

20. *DIAC give consideration to the qualification requirements for AMEP counsellors, to ensure that they are qualified to assist clients with all settlement-related issues.*

## **5.3 Assistance to clients not eligible for Australian Government employment services**

DfC agrees that AMEP clients who are not eligible for Australian Government employment services would be among the clients most likely to benefit from additional vocational counselling and guidance. Such assistance should not, however, be provided to the exclusion of more general counselling on settlement-related issues (see 5.1.1 above).

AMEP counsellors can perform an important referral service for clients not eligible for Australian Government employment services by directing them towards alternative employment-related services, programs and resources. For example, the Western Australian Employment Directions Network and Career Development Centre are State Government-funded initiatives that could assist AMEP clients in vocational planning and in locating employment opportunities.

DfC recommends that:

21. *AMEP counsellors assist clients not eligible for Australian Government employment services by providing a referral service to other employment-related services, programs and resources.*

## **5.4 Importance of early provision of advice regarding the need for English**

Counsellors should advise all clients of the need for good English skills to obtain almost any job in Australia. Anecdotal evidence obtained by DfC through a project delivered by OMI suggests that many AMEP clients leave their English studies early to seek work, and that they leave because they believe, incorrectly, that English skills are not needed to work in a range of jobs (for example, for work as a mechanic).

Provision of early advice that good English skills are needed to obtain most jobs in Australia may help to discourage clients from leaving the AMEP early. Advice should be provided to clients in the SSPP as well as those in the SSEP, because SSPP clients may also seek employment in future.

DfC recommends that:

*22. AMEP counsellors advise all clients, shortly after they commence AMEP studies, of the need for good English skills to obtain most jobs in Australia.*

## **6. Strengthening connections between AMEP and Australian Government employment services**

**“What strategies would help the AMEP and Australian Government service providers to work together and ensure appropriate and timely vocational/employment guidance to eligible clients?”**

### **6.1 Alignment of employment service providers’ incentives with clients’ interests**

DfC strongly agrees that there is “a need to increase and strengthen connections between AMEP and employment services.” However, it is critical that practical measures be taken to achieve this goal, which at present is a long way from being realised.

A key barrier to achieving this goal is limited alignment between the interests and incentives of employment service providers and AMEP providers. The current payment system for employment service providers encourages Job Network Members (JNMs) to pressure CaLD clients to take lower-skilled positions immediately, rather than continuing with English language and other studies. Employment service providers need to be given stronger incentives to assist clients to pursue longer-term education- and training-related goals (including learning English), as well as seeking employment.

DEEWR’s “The future of employment services in Australia: a discussion paper” recognised the disadvantages of current incentives, and proposed a new payment system for employment service providers. DfC supports a payment system that encourages employment service providers to support CaLD clients who wish to pursue longer term employment goals which require acquisition of further education and training.

DfC’s submission to the review of employment services makes several further recommendations that would potentially give employment service providers greater incentives to support CaLD clients in their longer term employment goals. These include accepting full-time study with the AMEP as an “intensive activity” for CaLD job seekers, which would remove the requirement for such job seekers to actively seek work until they have finished full-time study with the AMEP.

DfC recommends that:

*23. DIAC advocate for full-time study with the Adult Migrant English Program (AMEP) and Language, Literacy and Numeracy Program (LLNP) to be accepted as an intensive activity for CaLD job seekers.*

### **6.2 Benefits of linking ILPs and job seekers’ Employment Pathway Plans**

DEEWR’s discussion paper on the future of employment services in Australia proposed that an Employment Pathway Plan (EPP) be developed by each jobseeker, in conjunction with a case manager from their employment service provider. DfC believes that it would be desirable to enable employment service providers to draw directly on the information in a client’s ILP when developing their EPP. Development of a single document that can function as both ILP and EPP would support a case management approach to clients that addressed both English language acquisition and career planning (see 2.3 above).

A mechanism that enabled information to be transferred directly from an ILP to an EPP would make information sharing between AMEP and employment service providers quicker and easier. It may also encourage case managers to review and adopt career plans developed by clients in conjunction with their AMEP counsellor.

Mechanisms for allowing employment service providers to draw on information in ILPs include the following options:

**Option 1:** enabling employment service providers to download and save employment-related information stored in a client’s ILP directly into the client’s EPP;

**Option 2:** storing information relevant to both ILPs and EPPs in a single database, to which AMEP counsellors and employment service providers have data access and entry privileges appropriate to their roles, and from which either an ILP or an EPP can be generated; or

**Option 3:** developing a single comprehensive document that can function as both ILP and EPP, containing information relevant to clients’ English learning pathway through AMEP and other relevant programs (such as LLNP and WELL), and to their pathway towards employment.

Option 3 would be most effective in conjunction with a case management approach to clients that addressed both English language acquisition and career planning.

DfC recommends that:

*24. DIAC and DEEWR consider options for giving employment service providers direct access to employment-related information stored in clients’ ILPs, so that vocational planning information collected while a client is enrolled in the AMEP can be taken into account by employment service providers, and to facilitate a case management approach to clients.*

### **6.3 Participation of employment case managers in AMEP clients’ exit interviews**

One means of increasing coordination and information sharing between AMEP and employment service providers, in relation to individual client pathways, would be for the client’s case manager (from their chosen employment service provider) to attend the client’s AMEP exit interview.

DfC recommends that:

*25. DIAC and DEEWR consider options for encouraging the participation of employment case managers in AMEP clients’ exit interviews.*

## **7. Improve continuous enrolment**

**“Should interim classes for those arriving midterm be considered? If yes, would the Settlement for Social Participation pathway provide an appropriate initial pathway? Would trained bilingual aides be suitable for teaching the interim classes?”**

### **7.1 Introduction of interim classes**

DfC agrees that interim classes should be provided for those arriving midterm. DfC believes that interim classes should focus on social participation issues, but (in line with section 3.2 above) be delivered as part of a general AMEP stream.

DfC recommends that:

*26. Interim classes for midterm arrivals be introduced.*

### **7.2 Use of trained bilingual aides in interim classes**

Bilingual aides are not qualified teachers, and would not be suitable for teaching interim AMEP classes. However, use of bilingual aides to support teachers conducting interim classes could provide valuable support for AMEP clients with limited or no English. Further

information and recommendations in relation to bilingual workers in the AMEP are included under 8.1 below.

DfC recommends that:

27. *Trained bilingual aides not be used to teach interim AMEP classes.*

## 8. More bilingual support in mixed level classes

**“How can we best meet client needs for more structured, personal and progressive class tuition, with participants of differing educational levels? How would you envisage bilingual support being used in AMEP classes?”**

### 8.1 Bilingual support in mixed level classes

8.1.1 DfC agrees that bilingual support is likely to increase the benefits to students participating in mixed level classes and, in particular, to those who have no English skills at time of enrolment. However, DfC notes that the Discussion Paper refers to the benefit of bilingual support in the context of the low economic viability of small classes.

DfC suggests that a cost-benefit analysis be undertaken to determine whether it is more cost-effective to continue providing mixed level classes with the addition of trained bilingual aides, or to fund provision of smaller single level classes. The latter option, while possibly more costly, would ensure greater contact between students and a qualified teacher than could be provided by the use of bilingual aides, who do not usually have a teaching qualification. Advice from DET is that classes that use bilingual aides for multiple languages also need to be smaller in size, to avoid noise, confusion, crowding and classroom management issues, and so may not be the most cost-effective option.

One option would be to group students according to first language spoken, with bilingual workers available to assist those students at lower levels. The feasibility of, or necessity for, this option would depend on the numbers of people in each language group.

8.1.2 DfC believes that the use of bilingual aides in mixed level AMEP classes will be of greatest benefit to clients if aides are suitably trained and qualified. Training should cover matters such as the nature of the workplace, details of Australian culture, and the responsibilities of the role of bilingual worker. An appropriate qualification would be the Certificate IV in Bilingual Work, developed by Central TAFE and currently accredited for delivery in Western Australia. This Certificate would equip bilingual aides for work in the AMEP, while also providing them with a career path that includes working as an interpreter or translator.

8.1.3 DfC understands that AMEP students in advanced programs currently serve as bilingual aides in a voluntary capacity. DfC believes this role should be formally recognised, an appropriate remuneration provided, and this work documented on students' ILPs.

DfC recommends that:

28. *DIAC undertake a cost-benefit analysis of the alternatives of continuing to provide mixed level classes with trained bilingual aides, and providing smaller single level classes.*

29. *DIAC consider moving towards the introduction of a requirement that bilingual aides in AMEP have a minimum qualification of Certificate IV in Bilingual Work.*

30. *If AMEP students serve as bilingual aides in AMEP classes, provision be made for appropriate remuneration, and for their work to be documented on their ILP.*

### 8.2 Employment issues for bilingual aides

DfC notes that the languages needed by AMEP students are likely to vary over time as the immigration profile changes; for example, humanitarian arrivals from African nations have increased significantly in the past ten years, replacing the Balkans, which were the focus a decade ago. Accordingly, AMEP contracts should provide flexibility in the employment of bilingual aides in accordance with the demographic profile of clients.

31. *DIAC and AMEP providers consider the most appropriate basis on which to engage bilingual aides.*

## 9. Increased options for youth

**“How can 15 to 18 year olds, with low levels of literacy, best be provided with the English language and assistance they need to transition successfully into further education, training and employment”**

### 9.1 Additional opportunities for English language acquisition for youth in school

DfC strongly agrees that additional support is needed for 15 to 18 year olds in the school system, to enable them to cope with school work and to make greater language gains. DfC also agrees that the AMEP is not the most appropriate venue for providing such support. One approach that has had some success in several states is the provision of after-hours school support programs to refugee students. These programs provide weekly or bi-weekly assistance with school work, as well as life skills classes and recreational activities.<sup>1</sup>

Evaluations of existing school support programs suggest that they bring a range of benefits, including increased self-confidence and (in some cases) greater integration into the mainstream school system, as well as improved academic performance.<sup>2</sup> Although such programs are running in several States, they do not currently reach all refugee students.<sup>3</sup>

DfC believes that after-hours school support programs are ideal for providing additional language and literacy support to 15-18 year old humanitarian entrants. Given that such programs could serve a purpose similar to the AMEP for 15-18 year olds, DIAC would seem the most appropriate body to fund them.

One option would be for DIAC to provide funding for such programs to schools and community organisations, through either a grant or tender process. Enhanced funding of existing school support programs would allow them to operate effectively and professionally, to plan further ahead, and to undertake greater monitoring and evaluation of student progress and program performance.

DfC recommends that:

32. *DIAC consider funding schools and community organisations, through a tender process or grant mechanism, to provide after-hours school support programs that include assistance with improvement of English literacy and numeracy.*

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<sup>1</sup> See for example the case studies of after-hours school support programs for refugees discussed in DIAC (2008). *Empowering Refugees*.

[http://www.immi.gov.au/media/publications/settle/empowering\\_refugees/index.htm](http://www.immi.gov.au/media/publications/settle/empowering_refugees/index.htm) [accessed 29 July 2008].

<sup>2</sup> See for example the findings and evaluations provided in Horn, M, and Fewster D. (2007). “A profile of learning support programs in North-West Melbourne.” Melbourne Citymission, p. 29. [http://www.melbournecitymission.org.au/assets/files/public/reports/LSP\\_report.pdf](http://www.melbournecitymission.org.au/assets/files/public/reports/LSP_report.pdf) [accessed 28 July 2008]; Refugee Education Partnership Project (REPP) (2007) “The education needs of young refugees in Victoria,” p. 36. [http://www.survivorsvic.org.au/pdfdocs/EducationNeeds\\_YoungRefugees.pdf](http://www.survivorsvic.org.au/pdfdocs/EducationNeeds_YoungRefugees.pdf) [accessed 28 July 2008]; Centre for Multicultural Youth Issues (2006). “A three-way partnership?: exploring the experiences of CLD families in schools” p.16. [http://www.cmyi.net.au/uploads/downloads/cmyi/pdfs/Publications/Research/ThreeWay\\_Partnership.pdf](http://www.cmyi.net.au/uploads/downloads/cmyi/pdfs/Publications/Research/ThreeWay_Partnership.pdf) [accessed 28 July 2008].

<sup>3</sup> In Western Australia, community organisations that provide such programs on an ad hoc basis have reported that demand for them greatly exceeds the organisations’ capacity to supply.

## **9.2 Funding for English classes for children of class 457 visa holders**

DfC believes that the English as a Second Language – New Arrivals (ESLNA) should be extended to the children of 457 visa holders. At present, Australian Government funding to states and territories under ESLNA program does not cover newly arrived school students who are the children of Subclass 457 visa holders (temporary migrants), and so who are in Australia on a temporary basis.

There has been a substantial increase in the number of dependants of Subclass 457 visa holders in Australia, and this is placing significant strain on schools whose primary purpose is not the teaching of English as a second language. Figures for Western Australia, for example, indicate that resources directed to schools for English as a Second Language support for dependants of Subclass 457 visas holders have risen from 92 in Semester 1 2005 to around 1400 in June 2008. The States and Territories have previously called for a relaxation of the ESLNA eligibility requirements, to allow dependants of temporary skilled migrants to access the program. DfC supports this approach, particularly in light of the fact that an increasing proportion of 457 visa holders are converting to permanent residency.<sup>4</sup>

DfC recommends that:

33. *Federal Government funding to states and territories under the ESLNA Program should include funding for children of class 457 visa holders, at the same rate as non-humanitarian students.*

## **9.3 Youth who drop out of school**

9.3.1 DfC strongly agrees that the eligibility for the AMEP should be extended to include 15 to 18 year olds who have dropped out of school. These young people may already have had negative experiences at mainstream schools, and are also likely to experience barriers to employment or further education due to low literacy levels. They may need special assistance to re-engage with educational and training activities.

9.3.2 DET has advised DfC that, in Western Australia, support is offered to students while they are still at school to ensure that they do not drop out of education or related activities. The mandatory school leaving age in Western Australia was recently raised, and is now the end of the year in which a person turns seventeen. Young people leaving school before that time are required to participate in one of a range of alternative employment or training options until they reach the school leaving age.

To ensure that all young people are provided with support in choosing and pursuing one of these options, DET's Participation Directorate employs over 70 Participation Coordinators located in all 14 education districts. The facility is characterised by a case management approach, engagement with local community services and the completion of Individual Pathway Plans (IPPs) to assist the young person in making an effective transition. Referral to the AMEP for CaLD young people who have left school would be possible if this option were made available.

9.3.3 Programs that offer a mixture of recreational and educational activities are a proven means of engaging at risk young people in education and training and would be a valuable enhancement to the AMEP. Provision of the AMEP in informal settings and in conjunction with sporting and recreational activities (as occurs with some after-hours school support programs) is also likely to increase the willingness of youth to participate.

The Newly Arrived Youth Support Services (NAYSS) program, funded by DIAC and delivered by the Association for Services to Torture and Trauma Survivors (ASeTTS), would provide one source of referral to these courses.

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<sup>4</sup> Senator Chris Evans (2008). "Sustaining the boom: the role of skilled migration in the WA economy." Keynote address, John Curtin School of Public Policy, Perth, 17 July 2008.

DfC recommends that

34. *The AMEP provide assistance to 15 to 18 year olds who have dropped out of school and who are not being assisted.*
35. *DIAC explore strategies for directing 15 to 18 year olds who have dropped out of school to the AMEP, including services such as the Western Australian Government's Participation Coordinators and ASeTTS' NAYSS initiative.*
36. *DIAC explore options for delivering the AMEP to 15 to 18 year olds in informal settings, in conjunction with sporting and recreational activities.*

#### **9.4 Post-school options for youth**

9.4.1 During consultations for this submission, and for its submission to the review of the LLNP, DfC was advised by stakeholders that many students and some AMEP providers are unaware of the LLNP. Accordingly, DfC recommended increased promotion of the Program through state-based and community organisations. Active promotion of the LLNP through after-hours school support programs provided to 15 to 18 year olds in the school system (see 9.1 above) would also ensure greater awareness of LLNP.

Centrelink's Commonwealth Career Information Centres (CICs) could also more actively offer assistance to young people to help them understand the available post-school options. In Western Australia, the CIC is co-located with DET's Career Development Centre and an Employment Directions Network (EDN) agency, and provides regular information seminars to CaLD students from local public and private high schools, including Muslim colleges. It also refers students to a wide range of other State and Federal Government services. Greater promotion of CICs to CaLD students at all high schools and Intensive English Centres (as well as any AMEP classes delivered to this age group) would assist them to obtain the information they need to plan a post-school pathway.

9.4.2 Western Australia recognises the difficulties that students and their parents have negotiating an appropriate pathway to further education, training and employment. Through the EDN, DET funds community-based agencies to provide career guidance and advice. It specialises in providing support to a range of people who may need special assistance in determining a career pathway, including people from CaLD backgrounds.<sup>5</sup>

One EDN service, the free Parents as Career Partners seminar, helps parents to understand the current work and training environment, and provides practical steps to assist their children with career planning.<sup>6</sup> In 2006-07, 1087 people attended one of these seminars. The EDN also provides other specialised services for school-leavers, such as career workshops at local schools, and the School Leaver Program which assists students with transitions from school to further education, training, apprenticeships, traineeships, employment and other career and lifestyle options.<sup>7</sup> In 2006-07 the School Leaver Program reached 11,230 school leavers in WA.

DfC recommends that:

37. *DIAC actively encourage the promotion of the LLNP through after-hours school support programs that it funds.*
38. *DIAC recommend to Centrelink that its CICs be more widely promoted to CaLD 15 to 18 year olds at high schools and Intensive English Centres.*

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<sup>5</sup> EDN (n.d.) "Employment Directions Network." <http://www.employmentdirections.net.au/> [accessed 30 July 2008].

<sup>6</sup> EDN (n.d.). "Parents as Career Partners seminars." <http://www.employmentdirections.net.au/pacp.html> [accessed 30 July 2008].

<sup>7</sup> EDN (n.d.). "School Leaver Program." <http://www.employmentdirections.net.au/slp.html> [accessed 30 July 2008].

39. DIAC consider expansion of the Western Australian Employment Directions Network model, and youth-targeted initiatives such as the Parents as Career Partners seminars.

## 10. Increased allocation of hours

“What is the best option for making more hours available to clients, particularly those with greater need?”

### 10.1 Removal of the 510-hour cap on the AMEP entitlement

The Discussion Paper lists a range of measures taken in other countries to ensure that CaLD migrants can learn English (p.22), but does not include any of these measures in the list of options for increasing the number of hours available through the AMEP (p.23). DfC believes that the most appropriate option for Australia would be to adopt the approach of Canada and the United Kingdom which is not to cap the number of hours of English language training available to eligible migrants.

DfC believes that access to English language training should cease only when a client achieves adequate English language proficiency, currently set at the level of Certificate III in Spoken and Written English. As well as assisting clients to acquire English skills adequate for participation in Australian society, this will also ensure that clients are adequately equipped to pass the Australian citizenship test, under which candidates must be able to demonstrate that they have “a basic knowledge of the English language.”<sup>8</sup>

DfC recommends that:

40. *The 510-hour cap on the entitlement to English language training for eligible migrants be removed.*

## 11. Increased delivery settings

“How can clients in employment be best supported to continue learning English through the AMEP?”

### 11.1 The Workplace English Language and Literacy (WELL) program model

DfC anticipates that changes to employment services in Australia will alleviate pressure on employment service providers to encourage humanitarian entrants into employment as soon as possible after arrival in Australia, without consideration of both their short- and long-term goals. However, DfC acknowledges that, in many cases, it is humanitarian entrants’ choice to seek immediate employment. DfC believes that this choice should be respected and that a mechanism should be developed to assist these people to access the AMEP.

Consultations with WELL program providers suggest that the following are important considerations for delivery of workplace-based training:

- case-by-case negotiation with employers for delivery of the AMEP in their workplaces
- flexibility in size, length, timing and location of classes, to fit in with the operating parameters of each workplace
- use of a range of delivery modes as appropriate (including drop-in centres, one-on-one sessions, small and large groups, on-line delivery and correspondence)

A guide to delivery of the WELL program, “Doing WELL in the West,” gives a summary of best practice in WELL delivery in Western Australia to date, and is available from the

<sup>8</sup> Australian Government (2008). “Citizenship test review: terms of reference.” <http://www.citizenshiptestreview.gov.au/content/tor.htm>. [accessed 31 July 2008].

Western Australian WELL office.<sup>9</sup> This guide may assist in the development of options for workplace delivery of the AMEP.

DfC recommends that:

41. *DIAC consider lessons learned from the WELL program for guidance on how the AMEP may be delivered to clients in employment.*

## 12. Childcare arrangements

### 12.1 Alternative sources of childcare for AMEP clients

12.1.1 Given the well-documented shortage of childcare places across Australia, DfC agrees with the suggestion that increased use be made of AMEP classes held in community settings, where these offer adequate childcare facilities. During consultations conducted by DfC, stakeholders including the Edmund Rice Centre (Mirrabooka) and The Gowrie argued that English language classes in informal community settings are preferable to classes held at TAFE colleges for some female clients (including women with large families) because these clients may not feel comfortable in the formal TAFE environment. Greater provision of AMEP classes at community venues would help to reduce difficulties in obtaining childcare places for AMEP clients, while also increasing the uptake of AMEP classes by female migrants with children.

12.1.2 There may be significant benefits in locating AMEP classes at community venues that provide other services to CaLD migrants, and particularly those that also have Settlement Grant Program (SGP) funding. For example, the Edmund Rice Centre (Mirrabooka) offers a wide range of settlement-related services, such as advice on employment, education and training, assistance with accommodation and housing, a range of education facilities and programs (including non-accredited English courses), and trauma and torture counselling.<sup>10</sup>

Collocation of AMEP at such venues would provide a familiar environment for clients who would also benefit from greater integration of services.

DfC recommends that:

42. *DIAC provide more AMEP classes in informal community settings with suitable childcare facilities.*

43. *DIAC consider offering AMEP classes at venues that already provide SGP and other migrant services.*

### 12.2 Use of accredited childcare services

Any childcare services provided for the children of AMEP clients should be accredited by the National Childcare Accreditation Council and participants in the Child Care Quality Assurance system most appropriate for the type of care in question.<sup>11</sup> Provision of unaccredited childcare to the children of AMEP clients is unacceptable.

Concerns about the quality of childcare services were raised with DfC by multiple stakeholders during consultations for this submission. Concerns mentioned included use of inappropriate spaces, lack of adequate or culturally appropriate resources for children, lack of an educational focus or curriculum and insufficient staff numbers.

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<sup>9</sup> Contact details for the Western Australian WELL office are as follows: telephone (08) 9464 4017; email address [wellwa@deewr.gov.au](mailto:wellwa@deewr.gov.au); postal address GPO Box 9880 (Loc 301), Perth, WA 6848.

<sup>10</sup> Edmund Rice Centre (n.d.) "Settlement." <http://www.edmundricecentremirrabooka.com/settlement.html> [accessed 4 August 2008].

<sup>11</sup> Further details can be found at National Childcare Accreditation Council Inc. [http://www.ncac.gov.au/about\\_ncac/ga\\_childrens\\_services.asp?note=update](http://www.ncac.gov.au/about_ncac/ga_childrens_services.asp?note=update) [accessed 5 August 2008].

DfC recommends that:

44. *DIAC ensure that the AMEP tender documentation requires childcare services used by the Program to be accredited by the National Childcare Accreditation Council and participants in the relevant Child Care Quality Assurance system.*

### **12.3 Need for additional funding for childcare**

While the measures outlined above would provide additional sources of childcare, they are unlikely to meet current levels of demand. Consultations conducted by DfC reveal a severe and ongoing shortage of childcare for AMEP clients in Western Australia. Lack of reliable access to childcare was cited by some of those consulted as one of the main reasons that many women do not use all their AMEP hours; similar issues may be present in other states.

DfC recommends that:

45. *DIAC provide greater funding for delivery of childcare services under the AMEP.*

## **13. More effective learning**

**“What resources need to be developed or made more accessible to students wishing to learn at home? Is there value in having a central repository of resources, including Distance Learning materials that all AMEP providers can use?”**

### **13.1 Central repository of resources**

Without making any recommendation as to the type of resources that should be developed or made more accessible, DfC strongly supports a central repository of resources, including Distance Learning materials, which all AMEP service providers can use. This would be a sound way of providing efficient access to resources. DfC has been advised that, until 2008, the national AMEP Research Centre had hosted a national repository of research and other materials, and that this approach had facilitated sharing of materials.

DfC recommends that:

46. *A central repository of resources, including Distance Learning materials, be developed and actively promoted to AMEP service providers.*

## **14. Better promotion of the AMEP**

**“How can the AMEP better market the program to reach as many eligible clients as possible?”**

### **14.1 Promotion of the AMEP to and through state-based organisations**

DfC believes that the strategies for increasing awareness of the AMEP listed in the Discussion Paper would be likely to be successful. Promotion of the AMEP through the State Government agencies with which new migrants interact shortly after arrival in Australia would also be a means of reaching potential AMEP clients. These would include agencies responsible for housing, education and training, and multicultural interests. For example, OMI publishes a bimonthly newsletter, sent to all ethnic community organisations, which could be used to provide information or reminders about the AMEP. OMI’s email network could also be used for this purpose.

DfC recommends that:

47. *DIAC promote the AMEP through State Government agencies with which new migrants interact shortly after arrival in Australia.*

48. *The Home Tutor Scheme be actively promoted as suitable for people with disabilities and for parents caring for children.*

## 15. Changes to the curriculum

**“How can work preparation modules be best incorporated into the CSWE? What alternatives to the CSWE could be used in the SSPP?”**

### 15.1 Adoption of non-CSWE curriculum for SSPP clients

DfC supports the development of increased flexibility within the CSWE curriculum for delivery of content, and provision of skills training, relevant to future employment. DfC does not support the proposal to give service providers the flexibility to adopt a non-CSWE curriculum, and believes that the CSWE is sufficiently adaptable to be used with content related to either employment or to social participation, as occurs at present. The development of a national AMEP resource repository will assist in providing a range of course materials suitable for SSPP (see 13.1 above).

The major advantages of the CSWE over other English as a Second Language curricula are that the CSWE is nationally accredited, requires ongoing professional development of teachers, and conducts regular quality assessment of classroom study materials used by teachers. To DfC’s knowledge, other curricula such as the Certificate in English as a Second Language do not provide these benefits. Moreover, clients in the SSPP should not be provided with English language training that is at a lower standard than that provided to clients in the SEPP.<sup>12</sup>

DfC recommends that:

*49. Service providers be required to offer CSWE for delivery of the SSPP as well as the SEPP.*

## 16. Improved reporting arrangements

### 16.1 Benefit of reporting other learning achievements

DfC strongly agrees with the proposal to increase the range of reports available on those exiting the AMEP, and supports collecting the additional reports listed in the Discussion Paper. DfC suggests that reporting of other learning achievements should include attainment of a driver’s licence. Program outcomes reporting should include obtaining recognition of overseas qualifications.

DfC recommends that:

*50. The AMEP collect a wider range of reports relating to learning outcomes, other learning achievements (including attainment of a driver’s licence), settlement outcomes and program outcomes (including obtaining recognition of overseas qualifications).*

## 17. Better targeted professional development of teachers

**“Is there a need for more training of teachers in the development of programs that cater to the interests and needs of the client group? Taking into account that overall professional development of teachers is the responsibility of employing agencies, are there emerging training needs for teachers?”**

### 17.1 Importance of cross-cultural training for AMEP teachers

DfC strongly believes that cross-cultural training is vital for AMEP teachers and service providers to do their jobs well. To produce maximum benefit, such training should be

<sup>12</sup> Similarly, courses that are not structured to teach English as a Second Language, such as the Certificate of General Education for Adults, often offered under the LLNP, are not appropriate for the Settlement for Social Participation Pathway (A discussion of the suitability of the Certificate of General Education for Adults for CaLD clients is included in OMI’s submission to the review of the LLNP.)

compulsory and ongoing for AMEP teachers and service providers; a one-day course in cross-cultural training would not raise cross-cultural awareness to a level required by providers.

DfC recommends that:

*51. DIAC fund provision of compulsory, ongoing cross-cultural training for AMEP teachers and service providers.*

## **18. Other issues**

### **18.1 Registration requirements for AMEP**

DfC believes that increased uptake of AMEP may be facilitated if registration is required within twelve months of arrival, rather than three months, as is the case at present. This would give migrants who face challenges in settling in Australia additional time in which to find out about the Program and to complete the registration process. The current requirement to register within three months would appear to serve no useful purpose, given that clients may defer their course indefinitely once they have registered. A twelve month window for registration would also be consistent with an extension of Integrated Humanitarian Settlement Strategy services from the current six months to twelve months, as has been proposed by Western Australia.

DfC recommends that:

*52. Migrants eligible for the AMEP be required to register with the Program within twelve months of arrival in Australia.*

## List of recommendations

DfC recommends that:

1. *DIAC consider the outcomes of the reviews of employment services and of the LLNP while determining the best way forward for the AMEP.*
2. *DIAC and AMEP providers give special consideration to meeting the needs of CaLD clients with a disability who seek to access the AMEP.*
3. *DIAC, in conjunction with DEEWR, introduce a case management approach to CaLD clients' access to English language training and that this integrates career counselling and planning with advice on English language training, for clients seeking employment.*
4. *DIAC work with DEEWR and providers of AMEP, LLNP and WELL to develop a seamless pathway between English language programs available to CaLD migrants.*
5. *DIAC redefine the target groups for the client pathways to focus directly on clients' motivation for learning English.*
6. *DIAC allocate clients to a pathway once they have completed CSWE II.*
7. *DIAC articulate further the goals and delivery approach for the SSPP.*
8. *DIAC ensure that the development of separate streams within the AMEP does not impact negatively in any way on the benefits offered to clients directed towards the SSPP.*
9. *DIAC reaffirm that the major outcome targeted for all AMEP clients, whether in the SEPP or SSPP, be achievement of Certificate III in Spoken and Written English.*
10. *Counsellors meeting with clients in the SSPP regularly review whether clients wish to transition to the SEPP, and facilitate a transition accordingly.*
11. *DIAC and AMEP providers ensure that courses offered in the SEPP and SSPP enable clients to transition smoothly between them.*
12. *ILPs be provided to AMEP clients in all pathways, and the ILP format be sufficiently flexible to be of use to clients in all pathways.*
13. *ILPs be developed primarily as electronic documents, with a copy provided to the client after each update, or on request.*
14. *DIAC give consideration to enabling access to ILPs for relevant service providers, for example through development of an online database of ILPs.*
15. *ILPs provide space for including any additional information agreed to be relevant to a client's pathway, such as details of qualifications, and whether the qualifications have been recognised in Australia.*
16. *DIAC consider the best means by which to ensure that any information stored in the ILP that may be sensitive is treated as confidential and not shared with other service providers.*
17. *AMEP counsellors continue to provide counselling across the range of settlement issues, to clients in all AMEP pathways, including the SEPP.*

18. *DIAC, in conjunction with AMEP providers, consider the most appropriate means to ensure that AMEP counsellors assisting clients in the SEPP are well informed about available services and programs.*
19. *DIAC, in conjunction with DEEWR, AMEP providers, and relevant State Government departments, consider the best means to ensure information sharing between AMEP providers and relevant State and Federal Government departments regarding services and programs relevant to AMEP clients.*
20. *DIAC give consideration to the qualification requirements for AMEP counsellors, to ensure that they are qualified to assist clients with all settlement-related issues.*
21. *AMEP counsellors assist clients not eligible for Australian Government employment services by providing a referral service to other employment-related services, programs and resources.*
22. *AMEP counsellors advise all clients, shortly after they commence AMEP studies, of the need for good English skills to obtain most jobs in Australia.*
23. *DIAC advocate for full-time study with the Adult Migrant English Program (AMEP) and Language, Literacy and Numeracy Program (LLNP) to be accepted as an intensive activity for CaLD job seekers.*
24. *DIAC and DEEWR consider options for giving employment service providers direct access to employment-related information stored in clients' ILPs, so that vocational planning information collected while a client is enrolled in the AMEP can be taken into account by employment service providers, and to facilitate a case management approach to clients.*
25. *DIAC and DEEWR consider options for encouraging the participation of employment case managers in AMEP clients' exit interviews.*
26. *Interim classes for midterm arrivals be introduced.*
27. *Trained bilingual aides not be used to teach interim AMEP classes.*
28. *DIAC consider wider training for and use of Multicultural Education Aides in AMEP classes, following the concept developed in Victoria.*
29. *DIAC undertake a cost-benefit analysis of the alternatives of continuing to provide mixed level classes with trained bilingual aides, and providing smaller single level classes.*
30. *If AMEP students serve as bilingual aides in AMEP classes, provision be made for appropriate remuneration, and for their work to be documented on their ILP.*
31. *DIAC and AMEP providers consider the most appropriate basis on which to engage bilingual aides.*
32. *DIAC consider funding schools and community organisations, through a tender process or grant mechanism, to provide after-hours school support programs that include assistance with improvement of English literacy and numeracy.*
33. *Federal Government funding to states and territories under the ESLNA Program should include funding for children of class 457 visa holders, at the same rate as non-humanitarian students.*
34. *The AMEP provide assistance to 15 to 18 year olds who have dropped out of school and who are not being assisted.*

35. *DIAC explore strategies for directing 15 to 18 year olds who have dropped out of school to the AMEP, including services such as the Western Australian Government's Participation Coordinators and ASeTTS' NAYSS initiative.*
36. *DIAC explore options for delivering the AMEP to 15 to 18 year olds in informal settings, in conjunction with sporting and recreational activities.*
37. *DIAC actively encourage the promotion of the LLNP through after-hours school support programs that it funds.*
38. *DIAC recommend to Centrelink that its CICs be more widely promoted to CaLD 15 to 18 year olds at high schools and Intensive English Centres.*
39. *DIAC consider expansion of the Western Australian Employment Directions Network model, and youth-targeted initiatives such as the Parents as Career Partners seminars.*
40. *The 510-hour cap on the entitlement to English language training for eligible migrants be removed.*
41. *DIAC consider lessons learned from the WELL program for guidance on how the AMEP may be delivered to clients in employment.*
42. *DIAC give consideration to provision of AMEP classes in informal community settings with suitable childcare facilities.*
43. *DIAC consider offering AMEP classes at venues that already provide SGP and other migrant services.*
44. *DIAC ensure that the AMEP tender documentation requires childcare services used by the Program to be accredited by the National Childcare Accreditation Council and participants in the relevant Child Care Quality Assurance system.*
45. *DIAC provide greater funding for delivery of childcare services under the AMEP.*
46. *A central repository of resources, including Distance Learning materials, be developed and actively promoted to AMEP service providers.*
47. *DIAC promote the AMEP through State Government agencies with which new migrants interact shortly after arrival in Australia.*
48. *The Home Tutor Scheme be actively promoted as suitable for people with disabilities and for parents caring for children.*
49. *Service providers be required to offer CSWE for delivery of the SSPP as well as the SEPP.*
50. *The AMEP collect a wider range of reports relating to learning outcomes, other learning achievements (including attainment of a driver's license), settlement outcomes and program outcomes (including obtaining recognition of overseas qualifications).*
51. *DIAC fund provision of compulsory, ongoing cross-cultural training for AMEP teachers and service providers.*
52. *Migrants eligible for the AMEP be required to register with the Program within twelve months of arrival in Australia.*