

Office of Multicultural Interests

Response to “Language, Literacy and Numeracy Program Services: discussion paper for consultation”

14 July 2008

Introduction

The Office of Multicultural Interests (OMI) welcomes the opportunity to provide input to “Language, Literacy and Numeracy Program Services: discussion paper for consultation,” released by the Department of Education, Employment and Workplace Relations (DEEWR) in June 2008.

The discussion paper sets out key Government objectives, and identifies increasing incentives for training and a social inclusion agenda as key planks in achieving those objectives. OMI endorses these proposals as valuable means towards increasing participation in employment. OMI especially welcomes the focus on social inclusion as a suitable framework within which to consider support for language, literacy and numeracy.

OMI’s principal concern with the discussion paper is its limited focus on migrants and refugees, particularly those from culturally and linguistically diverse (CaLD) backgrounds. Specific strategies are needed to ensure that the LLNP can be accessed by CaLD clients, and that they reap the full benefit of the program.

OMI also considers that there should be greater integration of the LLNP with other English Language courses, in particular, the Adult Migrant English Program (AMEP) and, where possible, the Workplace English Language and Literacy (WELL) Program, to maximise the English language training benefits for CaLD clients.

OVERARCHING CONSIDERATIONS

Relationship of LLNP to other English language programs

The future of the LLNP should not be considered in isolation from other English language programs available to CaLD clients. A key issue of concern for OMI is the extent to which the LLNP and other English language training programs enable CaLD clients to achieve a level of English language proficiency necessary for successful settlement in Australia, and for employment at a level commensurate with their skills and experience.

Lack of continuity between English language programs is a key barrier to CaLD clients gaining maximum benefit from the programs. For example, lack of awareness of available English language programs may prevent many CaLD clients from enrolling in the most appropriate program. OMI’s consultations suggest that CaLD individuals participating in AMEP may not learn about LLNP, because AMEP providers often do not provide LLNP, and miss opportunities to inform their clients about it. The Across-Government Working Party on Settlement Issues for African Humanitarian Entrants cites cases of inappropriate referrals between English language programs in its final report, and notes the need for greater coordination.¹

¹ The Across-Government Working Party on Settlement Issues for African Humanitarian Entrants (2007). Final Report. Not publicly available.

Additionally, no single organisation is responsible for assisting CaLD migrants to understand and access the range of available English language programs, including LLNP. One provider consulted by OMI noted that some CaLD clients do not enrol in LLNP because they fear that it might make them ineligible for unemployment benefits. OMI believes that a case-management approach is required to ensure that clients are provided with a pathway that is appropriate to their needs and circumstances. A case-management approach would also be a constructive means of providing a tailored response to the wide range of vocational and non-vocational training needs of CaLD migrants and refugees.

A further concern is that the LLNP does not give CaLD clients the same level of support as the AMEP. Whereas the AMEP provides childcare and counselling services, these are not available through LLNP or WELL program. This forms a significant barrier to some CaLD individuals considering enrolling in LLNP. A seamless pathway between English language programs is required, with each program providing a similar level of support for individual CaLD clients at each step. Such an approach will reduce the risk of clients 'falling through the gaps.'

OMI recommends that:

1. *DEEWR work with the Department of Immigration and Citizenship (DIAC) and providers of LLNP and AMEP to develop a seamless pathway between English language programs available to CaLD migrants.*
2. *DEEWR, in conjunction with DIAC, introduce a case-management approach to CaLD clients' access to English language training.*

Relevance of the ongoing review of AMEP

OMI believes that the outcomes of the review of the AMEP which is currently underway should be considered as part of the review of the LLNP. At the time of writing this submission, consultations for the AMEP review had started, but the discussion paper had not yet been released.

OMI recommends that:

3. *DEEWR consider the outcomes of the review of the AMEP while determining the best way forward for the LLNP, to ensure ongoing integration between the programs.*

Consideration of the special needs of CaLD clients with a disability

CaLD clients with a disability, such as a learning impairment, mental illness or physical disability, may have special needs in relation to accessing and progressing within the LLNP. The Ethnic Disability Advocacy Centre 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 LLNP, one-on-one assistance, access to assistive devices in the classroom, and/or delivery of LLNP in venues with universal access.

OMI recommends that:

4. *DEEWR and LLNP providers give special consideration to meeting the needs of CaLD clients with a disability who seek to access LLNP.*

WHAT SERVICES SHOULD THE AUSTRALIAN GOVERNMENT BE PURCHASING?

“How effective is the LLNP in preparing clients for daily life and employment?”

There are inevitably limits to the capacity of the LLNP to address the wide range of client needs, and not all needs can be fully addressed within the one program. However, issues identified during the preparation of this submission were:

Vocational English Skills²

There is a need for an increased focus on the provision of vocational English skills to help maximise the employment prospects for CaLD jobseekers. Australian research shows that lack of vocational or professional-level English skills is a key barrier to employment for CaLD jobseekers with qualifications and skills obtained outside Australia.³ Even CaLD jobseekers who have obtained qualifications from Australian universities may face challenges in gaining employment commensurate with their qualifications.⁴ This need was recently recognised in a report by the Chamber of Commerce and Industry of Western Australia.⁵

OMI notes that there has been reduced focus on advanced courses for vocational English in recent years, despite the potential benefits of such courses to CaLD job seekers. In Western Australia, the Migrant Pathways Programs, funded by the WA Department of Education and Training and offered by Central TAFE, are the only such courses of which OMI is aware. In the past, by contrast, a range of courses were funded by DEEWR and successfully delivered through the Advanced English for Migrants Program (AEMP) at TAFE colleges. These included Migrant Advanced English (MAE), Job-Oriented Migrant English courses (JOME) and Courses in Academic and Professional English (CAPE).

While OMI notes the existence of Advanced Vocationally Oriented Courses (AVOC) offered under LLNP, OMI is aware of very few providers currently offering AVOC. Such programs can provide valuable support for overseas-qualified jobseekers seeking to upgrade their English language skills to the level required for Australian workplaces.

An increased focus on provision of training in vocational or professional English skills, either as stand-alone programs or as a stream within LLNP, is needed in order to contribute to improved employment prospects for CaLD jobseekers. If targeted to clients with qualifications in areas of skills shortages, AVOC could also directly address the skills crisis currently facing Australia.⁶

OMI recommends that:

5. *DEEWR consider providing additional funding for the provision of programs that target language for specific vocational and professional job roles in areas of recognised skills shortage.*
6. *DEEWR provide additional funding for the provision of courses in professional-level English skills, either as a stream within LLNP or in the form of stand-alone programs.*

Promotion of Courses

Where courses in vocational English are available, they should be more widely promoted, to increase the levels of awareness and uptake. Promotion of courses catering to areas of skills shortage should be given particular priority.

OMI recommends that:

7. *DEEWR increase the promotion of courses in vocational or professional level English, with a particular focus on courses in recognised areas of skills shortage.*

² See also the response to the question "How could specialised services such as Advanced Vocationally Oriented Courses (AVOC) and Complementary Training (CT) be improved?" below.

³ Department of Immigration and Multicultural Affairs (2005), Submission (No.22) to the Productivity Commission study into the economic impacts of migration and population growth, 29 September 2005, p.14.

⁴ Birrell, B and Healy, E (2008) 'How are skilled migrants doing?' *People and Place* 16 (1), supplement, p.8.

⁵ Chamber of Commerce and Industry of Western Australia (2007). 'Recognition of experience and upgrading of overseas qualifications,' p. 19. Available from Chamber of Commerce and Industry of Western Australia on request via http://www.cciwa.com/Past_Projects.aspx#15138.

⁶ Such courses are likely to be most utilised and effective if employment services arrangements reward Job Network Members (JNMs) for directing clients towards them. In this regard, OMI refers DEEWR to its submission to the DEEWR discussion paper on the future of employment services. A copy of the submission can be provided on request.

“How could LLNP learn from other programs?”

DEEWR’s own Fast Track Apprenticeships Program provides the opportunity for further training and for mentored work experience, thereby enabling CaLD migrants whose overseas skills are not fully recognised in Australia to fill skills gaps and gain the local work experience that is vital for employment in Australian workplaces.⁷

Central TAFE’s AMEP Migrant Pathways Programs combine advanced English as a Second Language (ESL) CSWE Certificate III and IV training components with mentored workplace experience and, for CaLD students with limited education backgrounds, additional Registered Training Organisation training modules.

Migrant Pathways Programs offered by Central TAFE are Entrée to Work, Entrée to Community Services Work, Certificate I in Information Technology, Certificate III in Community Services: Aged Care/Community Work and Certificate III in Community Service: Children’s Services.

OMI recommends that:

8. *DEEWR evaluate and consider for broader application the Fast Track Apprenticeships Program and Central TAFE’s AMEP Migrant Pathways Programs.*

“What kind of flexibilities should be incorporated into Program delivery and why?”

Course Length and Contact Hours

At present, LLNP delivery allows some flexibility regarding content and the streaming of clients to ensure that clients with similar abilities and needs are grouped together (although consultations suggested that some LLNP providers and trainers were not aware of the existing level of flexibility available for program delivery).

At present options provide for between ten and twenty contact hours per week delivered across a 160-hour block. However, OMI believes that there is room for greater flexibility in terms of the length of time over which LLNP training is delivered.

Some clients, including those from CaLD backgrounds, may benefit from a less intensive program delivery option, of between five and ten hours per week. CaLD migrants who are still adjusting to daily life in Australia, who have significant job seeking or caring responsibilities, or who have had little formal education prior to arrival in Australia, may benefit from less intensive program delivery.

It is also noted that, while eligibility for the LLNP requires that a person be registered as a jobseeker with Centrelink and not a full time student, once enrolled, they are able to continue in training regardless of subsequent change in their eligibility. In the case of clients who have commenced full time study or work, a reduction in weekly hours would facilitate their continued participation in the LLNP.

OMI recommends that:

9. *DEEWR consider provision for LLNP to be delivered over a longer period of time with fewer contact hours per week.*

Workplace Culture

Many CaLD migrants would benefit from program delivery that incorporates guidance on Australian workplace culture. The Western Australian Department of Education and Training recently published “Employability Skills and Workplace Culture in Australia – A Guide for new migrants to Western Australia planning to enter the workforce” that provides an example of a

⁷ Further details are available at http://www.australianapprenticeships.gov.au/RTO/Fast_track.asp

mediated resource through which providers could offer information about Australian workplace culture for CaLD clients.

OMI recommends that:

10. Program delivery for CaLD clients include optional content modules that provide guidance on Australian workplace culture.

“What strengths from other services could we incorporate into LLNP?”

At a forum convened by DIAC in Perth on 13 June 2007, AMEP service providers identified a number of strengths within the current AMEP program that assist clients attain a level of English to facilitate successful settlement and optimise employment opportunities. These included a strong focus on quality of delivery, provision for a period of recovery for victims of torture and trauma, funding for childcare and provision of counselling services, and a curriculum that allows for vocational content to be included.

Such services are not currently provided under LLNP. However, access to childcare and appropriate counselling support is vital for many CaLD migrants seeking to improve their English. Many CaLD migrants have large families, and some are sole heads of households who could not afford childcare costs while attending LLNP classes. Some are refugees coping with a history of trauma and torture. Without access to services such as childcare and counselling, some CaLD clients may choose not to enrol in LLNP, or may drop out before completing a full block of training.

It is also noted that, to be eligible for the LLNP, a person must have no potential barriers to successful participation based on available information gained from the client. However, lack of childcare and counselling services could provide a systemic barrier to participation for this client group.

OMI recommends that:

11. DEEWR fund LLNP providers to provide child care and counselling services to CaLD clients.

“What structure for Program delivery would best meet clients’ needs and ensure successful outcomes, particularly for disadvantaged clients (eg Indigenous Australians) and clients with multiple barriers to learning?”

Need for LLNP to include an English as a Second Language (ESL) approach for CaLD clients

Based on consultations, OMI believes that a key barrier to provision of English language and other training to CaLD clients, as well as to optimal learning outcomes for CaLD clients, is that many LLNP providers do not currently offer an ESL pedagogical approach.

CaLD students need to learn language, literacy and numeracy skills within a curriculum that recognises that English is not their first language. At present a national ESL curriculum, Certificates in Spoken and Written English (CSWE) exists, and provides learning outcomes that are aligned to work-based literacy requirements. CSWE is already used by AMEP providers as part of DIAC’s settlement program for new migrants, and transition to higher certificates is seamless where CSWE is available through LLNP providers.

However, in Western Australia at least, few if any LLNP providers⁸ are licensed to deliver the CSWE. Most offer the Certificate of General Education for Adults (CGEA) instead. The CGEA curriculum is intended to provide bridging skills for Australian students for whom English is their first language, and is not designed for or appropriate for an ESL orientation. Feedback from students who have completed studies through the AMEP, and who undertake a CGEA course, is that CGEA does not support their learning. Students whose language is English have different learning needs from those for whom English is a second language. Therefore mixing ESL and non-

⁸ On the basis of its consultations, OMI did not identify any LLNP providers in WA that offer CSWE.

ESL students in a single class, identified in OMI's consultations as a common practice, is not mutually beneficial.

The most effective and efficient structure for program delivery to CaLD clients would be based on the recognition of their unique requirements in learning English as a second language. Having completed their 510 hour English language entitlement through AMEP CSWE programs, many CaLD clients would then benefit from acquisition of higher levels of CSWE English under their LLNP entitlement.

Adjustments to DEEWR's tendering and contractual conditions for LLNP could encourage providers to offer a separate ESL stream for CaLD clients. For example, tendering and contract conditions could restrict or disallow mixing of CaLD clients with other client groups within LLNP classes, or could take a more directive approach by requiring LLNP providers to offer CaLD clients training through CSWE or an equivalent ESL curriculum.⁹

In OMI's view, if changes are not made to enable CaLD clients to access CSWE or an equivalent through the LLNP, they will obtain limited benefit from referral to the LLNP. OMI's preference under such conditions would be for Centrelink to refer CaLD clients directly to CSWE or an equivalent, rather than to LLNP.¹⁰

OMI recommends that:

12. *DEEWR develop and introduce tendering and contractual strategies to encourage or require LLNP providers to offer CaLD clients separate ESL-oriented training options such as CSWE.*

“How could specialised services such as Advanced Vocationally Oriented Courses (AVOC) and Complementary Training (CT) be improved?”

Adequacy of AVOC/CT coverage

AVOC and CT are both valuable services for CaLD LLNP clients. AVOC has potential to address the lack of vocational English skills experienced by many CaLD migrants, including CaLD graduates having difficulty breaking into the Australian job market. CT, with its focus on disadvantaged client groups, has potential to assist highly disadvantaged CaLD individuals, particularly those with very low literacy skills and limited experience of formal education.

However, OMI's consultations suggest that few LLNP providers offer AVOC or CT and that some LLNP providers and instructors are not aware of either service. Additional research may be needed to identify the reasons why there is limited provision of these services at present.

OMI recommends that:

13. *DEEWR determine the reasons for limited provision of AVOC and CT and put in place measures to increase provision of these services.*

English Language Support for Vocational Training

The LLNP does not currently support provision of English Language Training for students undertaking vocational courses, although this could greatly assist them in their learning. As an example of a successful initiative of this type at the state level, the Western Australian Department of Education currently offers additional funding to support language development needs for CaLD and low literacy students enrolled in vocational courses. Both public and private Registered Training Organisations are able to access this money by enrolling their students in an additional course: the Course in Applied Vocational Study Skills (CAVSS), and providers report that

⁹ Details on the relative costs of offering CSWE and CGEA, and suggestions for encouraging LLNP providers to offer CSWE for CaLD clients are included below, in response to the question “Is the LLNP the most cost-effective way of skilling people with low language, literacy and numeracy skills? How could it be made more effective?”

¹⁰ If a CaLD client is assessed as having English language skills assessed as sufficiently advanced for them to participate in courses not targeted at students who have English as a second language, referral to LLNP would be appropriate.

completion rates are enhanced when they deliver the additional course.¹¹ The LLNP might build further on this successful model.

A curriculum that might be considered for use within LLNP is the ESL Frameworks Program from North Melbourne Institute of TAFE (NMIT).¹² The program is designed for CaLD adults, from beginner to advanced level, who want to improve their English for work, study or social purposes. The strength of the program is that it combines training in English as a second language with a range of vocational and other electives. A further advantage is that the content is flexible, and a range of training modules, including higher level vocationally-oriented modules, can be delivered depending on the needs and interests of students. The curriculum is particularly suitable for migrants with higher levels of education and prior work skills.

OMI recommends that:

14. *DEEWR give consideration to developing an additional program, or broadening existing programs, to deliver English language support to CaLD migrants undertaking vocational qualifications.*

15. *In implementing Recommendation 14, DEEWR and relevant vocational education organisations review and adjust curricula and resourcing for vocational courses, to ensure that they are compatible with the provision of English language support to CaLD students.*

“How can the linkages between LLNP providers and referring agencies [Centrelink and Employment Services Providers, including Job Network Members (JNMs)] be improved (noting that there has been a review of Employment Services Arrangements, as part of an open tender process occurring later this year)?”

Financial incentives to JNMs for clients' training outcomes

The success and uptake of English as a Second Language and job oriented English courses depends not only on the appropriateness of the programs, but also on adequate funding incentives by DEEWR to JNMs to support the selection of these options. Until JNMs are rewarded for achievement of training outcomes as well as employment outcomes, they are unlikely to refer clients to appropriate training.

OMI recognises that the new framework for employment services proposed by DEEWR as part of its review of employment services arrangements places greater emphasis on training than the current arrangements. OMI supports this approach, and refers DEEWR to its submission to the review of employment services, particularly recommendation 12, that full-time study with the Adult Migrant English Program (AMEP) or Language, Literacy and Numeracy Program (LLNP) be accepted as an intensive activity for CaLD job seekers.

OMI recommends that:

16. *DEEWR ensure that JNMs are given appropriate financial and other incentives for client's training outcomes as well as employment outcomes.*

Greater promotion of LLNP

As noted, above, anecdotal feedback to OMI suggests that the availability of LLNP courses is not widely known or advertised. Prospective CaLD clients would benefit from promotion of the Program and available courses through networks such as migrant resource centres and ethnic community groups. OMI would be able to assist by promoting the LLNP through its own networks.

OMI recommends that:

17. *DEEWR promote the LLNP through relevant State-based and community agencies to increase awareness of the Program and available courses.*

¹¹ Further information about CAVSS can be found on the website of the Western Australian Department of Education, at <http://www.vetinfonet.det.wa.edu.au/adultliteracy/CAVSS.aspx>

¹² Further information about NMIT's ESL Frameworks Program is available from the NMIT website at http://www.nmit.vic.edu.au/courses/foundation/english_a.html.

HOW SHOULD SERVICES BE PURCHASED AND MEASURED?

“Is the LLNP the most cost-effective way of skilling people with low language, literacy and numeracy skills? How could it be made more effective?”

As recommended above, increased coordination of LLNP services with other English language programs targeted at people from CaLD backgrounds, and increased use of CSWE rather than CGEA within the LLNP, will help to ensure that CaLD clients obtain the support needed to improve their language, literacy and numeracy skills sufficiently to participate in the Australian workforce.

It is also noted that the above approach will be most effective within the context of an employment services framework that encourages employment commensurate with clients’ skills and qualifications, rather than focusing on employment *per se*. In this regard, OMI refers DEEWR to its submission to the DEEWR discussion paper on the future of employment services in Australia.

“How could the current measurement of educational outcomes and client achievement be improved?”

Recognition of partial achievement of educational outcomes

Some CaLD clients have very limited formal education, it is unrealistic to expect them to make rapid and consistent progress in achieving current LLNP learning outcomes. For these clients, it would be more helpful if learning outcomes be broken down into separate components for listening, speaking, reading and writing, and the acquisition of pre literacy and foundation literacy skills be able to be assessed incrementally.

OMI recommends that:

18. DEEWR revise the LLNP educational outcomes to include separate components for listening, speaking, reading and writing, and to recognise incremental progress towards achievement of components.

Non-educational outcomes

Feedback to OMI suggests that client achievements resulting from participation in the LLNP include outcomes other than those in relation to language, literacy and numeracy levels. These include an increase in confidence and self-esteem illustrated by increased participation in social activities and life skills. While these outcomes are not always easily measured, other than through case studies and client feedback, it is suggested that provision be made for providers to report such outcomes in order to provide an indication of the breadth and depth of benefits of participating in the Program. Where LLNP providers provide elective units that cover matters such as life skills or workplace culture, outcomes will be more easily measurable.

OMI recommends that:

19. DEEWR consider encouraging LLNP providers to measure and document a broad range of client outcomes, including increased life skills, for LLNP clients.

“Do the current payment structures to LLNP service providers drive improved outcomes? If not what improvements could be made to gain improvements?”

The current payment structures provide payment at three points: at the commencement, mid-point and completion of a full 160-hour block of training. This approach rewards enrolment in training and progress towards completion of a block of training, as well as completion itself.

OMI’s consultation process identified a key weakness with the current funding model. AMEP providers consulted by OMI claimed that inadequate funding of the LLNP in past contracts has led to providers selecting and delivering the CGEA rather than the CSWE, because it is cheaper to

purchase and administer, although it is an inappropriate tool for teaching English as a Second Language (ESL) to CaLD migrants (see above).

The cost of purchasing a five-year license to the CSWE curriculum is \$2 750 per certificate for each site at which training is delivered; to deliver all four certificates would therefore cost \$11 000 per training site over five years. Additional administration costs for CSWE include the requirement for staff to undergo regular professional development and performance moderation, and to participate in moderation of classroom activities and assessment of student performance. The advantages to the students from an appropriate curriculum and ongoing staff development are obvious.

By comparison, an organisation that is already an RTO (as all LLNP providers are) need not pay to use the CGEA curriculum, and there are no requirements for professional development or moderation activities. Accordingly, CGEA is much cheaper than CSWE for LLNP providers.¹³

LLNP providers would be more likely to obtain a license for CSWE if DEEWR offered additional funding specifically for this purpose, as part of the tendering and contractual process, resulting in improved outcomes for students.

OMI recommends that:

20. DEEWR's tendering and contractual process for LLNP be revised to allow for reimbursement of part or all of the CSWE registration fees to LLNP providers that offer CSWE.

“Should providers be financially rewarded if their clients gain employment? If so how would it be measured?”

OMI does not support the proposal to reward LLNP providers financially if their clients gain employment. Introducing an incentive such as this detracts from the primary educational goals of the LLNP. For example, LLNP providers may be motivated by such an incentive to discourage CaLD clients from completing the multiple blocks of training often required for higher-level employment. Providers should focus on, and be rewarded for, improving clients' language, literacy and numeracy.

However, OMI notes that LLNP providers should not be financially disadvantaged in situations where a client does not complete training because they have found employment. LLNP providers are not currently reimbursed pro-rata for the portion of training delivered to clients who leave without completing training to take up employment.

OMI recommends that:

21. Rewards for LLNP providers when a client gains employment training not be introduced.

22. DEEWR ensure that LLNP providers are not financially disadvantaged in cases in which a client leaves the LLNP, without completing a full block of training, in order to take up paid employment.

¹³ Details of costings of CSWE and CGEA for RTOs were kindly provided to OMI by Sophie Burrows, Portfolio Manager, Adult Migrant Education Service (AMES), West Coast TAFE.

List of recommendations

OMI recommends that:

1. *DEEWR work with the Department of Immigration and Citizenship (DIAC) and providers of LLNP and AMEP to develop a seamless pathway between English language programs available to CaLD migrants.*
2. *DEEWR, in conjunction with DIAC, introduce a case-management approach to CaLD clients' access to English language training.*
3. *DEEWR consider the outcomes of the review of the AMEP while determining the best way forward for the LLNP, to ensure ongoing integration between the programs.*
4. *DEEWR and LLNP providers give special consideration to meeting the needs of CaLD clients with a disability who seek to access LLNP.*
5. *DEEWR consider providing additional funding for the provision of programs that target language for specific vocational and professional job roles in areas of recognised skills shortage.*
6. *DEEWR provide additional funding for the provision of courses in professional-level English skills, either as a stream within LLNP or in the form of stand-alone programs.*
7. *DEEWR increase the promotion of courses in vocational or professional level English, with a particular focus on courses in recognised areas of skills shortage.*
8. *DEEWR evaluate and consider for broader application the Fast Track Apprenticeships Program, and Central TAFE's AMEP Migrant Pathways Programs.*
9. *DEEWR consider provision for LLNP to be delivered over a longer period of time with fewer contact hours per week.*
10. *Program delivery for CaLD clients include optional content modules that provide guidance on Australian workplace culture.*
11. *DEEWR develop and introduce tendering and contractual strategies to encourage or require LLNP providers to offer CaLD clients separate ESL-oriented training options such as CSWE*
12. *DEEWR fund LLNP providers to provide child care and counselling services to CaLD clients.*
13. *DEEWR determine the reasons for limited provision of AVOC and CT and put in place measures to increase provision of these services.*
14. *DEEWR give consideration to developing an additional program, or broadening existing programs, to deliver English language support to CaLD migrants undertaking vocational qualifications.*
15. *In implementing Recommendation 14, DEEWR and relevant vocational education organisations review and adjust curricula and resourcing for vocational courses, to ensure that they are compatible with the provision of English language support to CaLD students.*
16. *DEEWR ensure that JNMs are given appropriate financial and other incentives for client's training outcomes as well as employment outcomes.*

17. DEEWR promote the LLNP through relevant State-based and community agencies to increase awareness of the Program and available courses.
18. DEEWR revise the LLNP educational outcomes to include separate components for listening, speaking, reading and writing, and to recognise incremental progress towards achievement of components.
19. DEEWR consider encouraging LLNP providers to measure and document a broad range of client outcomes, including increased life skills, for LLNP clients.
20. DEEWR's tendering and contractual process for LLNP be revised to allow for reimbursement of part or all of the CSWE registration fees to LLNP providers that offer CSWE. .
21. Rewards for LLNP providers when a client gains employment training not be introduced.
22. DEEWR ensure that LLNP providers are not financially disadvantaged in cases in which a client leaves the LLNP, without completing a full block of training, in order to take up paid employment.