11 February, 2022

To whom it may concern,

The NSW Adult Literacy and Numeracy Council welcomes this opportunity to provide our feedback on the Australian Government's Discussion paper – Delivery of the Skills for Education and Employment (SEE) Program 2023. The Council is a membership-based professional association of adult literacy and numeracy practitioners, program managers, researchers and teacher educators with extensive collective expertise, including in the delivery of the SEE program and other Commonwealth government funded programs over many years.

There have been multiple public forums for stakeholder input into the future of adult literacy/ Language, Literacy, Numeracy and Digital Skills/ Foundation Skills in recent years including through the Joyce Review of VET, the Productivity Commission Review of the Skills and Workforce Development Agreement, the Parliamentary Inquiry into Adult Literacy and its Importance to name just a few. The Council believes this review of the SEE program is a timely opportunity for a critical review of what the current SEE program has achieved and what a future program could and should aspire to achieve. We look forward to a fresh and ambitious program and a supporting policy that places Australia as an international leader in a socially progressive and quality education program for vulnerable adults.

Thank you for the opportunity to provide our feedback.

Yours sincerely,

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President, NSW Adult Literacy and Numeracy Council

Summary recommendations

The SEE program, particularly in the enhanced model we suggest through our recommendations, provides a real opportunity to engage the diversity of adults who can benefit from LLND-focused programs, including some of the most disadvantaged members of our community who have become alienated from work, study, and participation in the life of the community.

Practitioners in our organisation who have been involved in delivering the SEE program and/or the previous LLNP have found that the benefits participants report can be much broader than just the employment outcomes they may achieve. In particular, they have shown growth in their sense of self, confidence, self-esteem, ability to set personal goals, developing friendships and connecting with family and community members. All of these affective and social outcomes of learning are not 'optional extras': they are capabilities that all adults need for participating actively and productively in work, family, community and education. Providing education to support adults who have experienced disadvantage and barriers in life to achieve these social and personal outcomes is a social responsibility that can be served for many adults by the quality provision of the SEE program.

In addressing social disadvantage through pathways to education and employment and in the promotion of social cohesion, it is clear that the provision of a professionally developed and implemented SEE program would be of very significant public value and more than justifies the necessary public spending. This is a tremendous opportunity to significantly develop the capacity for the SEE program to realise its potential in enhancing the lives of individual participants together with the economic and social wellbeing of the broader Australian community. It is the right time to seize this opportunity.

We have summarised our key recommendations below, followed by our responses to a number of the questions from the Discussion paper.

1. Clarify the relationship between the Commonwealth Government's overall policy on adult literacy and program for jobseekers, and other LLND programs funded by the Commonwealth. The Parliamentary Inquiry into Adult Literacy and its Importance as well as other recent policy reviews (e.g., the Joyce Review of VET, the Review of the National Skills and Workforce Development Agreement) have shown that there is a need for wider provision of LLND programs than is currently being met by the SEE program. This points to two options:

   a. Broaden the objectives of the program that succeeds the current SEE program; or

   b. Introduce new funding for a successor program that retains the broad objectives of the current SEE program and introduce other LLND programs to reach those adults whose needs do not align well with what the SEE program is intended to address.

2. Rename the SEE program. Skills for Education and *Employment* is a misleading and outdated name, suggesting that jobseekers in the program can always expect to gain work as an employee. It does not recognise the growth of the gig economy where many workers are in some form of self-employment, nor does it recognise that many adults, particularly women are occupied in unpaid work in the home. Privileging the status of employed work does not reflect the reality of contemporary work.

3. Address the *Education* part of SEE. Much of the emphasis of the SEE program is in gaining employed work, and much less in further education. Program participants should be given the opportunity to develop knowledge and the LLND skills to research and plan opportunities for further education.

4. Ensure that a wrap-around service including free on-site medical health, mental health counselling, career counselling, disability support and child-care services are available to program participants.

5. Investigate a multi-provider model so that providers are contracted to provide programs that they are best placed to deliver for particular participant cohorts, for example:

    a. English language learners needing a program to further develop their English language skills for community participation

    b. Learners seeking skills and develop knowledge to enter/ re-enter the workforce

    c. Learners seeking to commence a particular VET course but needing LLND learner support

    d. Learners seeking a taster of VET courses with LLND learner support

    e. Learners for whom English is their first language, but who are needing a program to develop their literacy, numeracy and digital skills for community participation

    f. Learners who need an individualised non-accredited 'learning to learn' pathway program

    Tenders should include evidence that the provider has the experience and expertise to provide quality programs for the cohorts they are claiming they could teach.

6. Provide all eligible adults to enter a program and be given an opportunity to participate in learning. Participants with pre-ACSF 1 or ACSF 1 level LLND and others who may appear to have limited 'capacity to benefit' from the program should be afforded the opportunity to commence in an individualised learning program.

7. Programs focused on workforce development must develop participants' knowledge about the contemporary contexts of work: benefits and risks of different forms of work (e.g., casual employment, gig work, agency work), workplace rights and conditions (e.g., concerning WHS, bullying, overtime, leave, industrial awards, union membership, raising a workplace grievance) as part of developing the LLND for work. Ensuring that program participants complete the program with a sound understanding of their rights in Australian workplaces should be a requirement of the work-focussed program.

8. Payment to providers should be based on scheduled hours of teaching.

9. Each provider must have a critical mass of postgraduate qualified specialist adult TESOL/ Literacy and Numeracy teachers who have expertise in programming and assessment, who can plan and develop programs based on their actual learners' needs and goals. Teachers should not be relying on generic 'teacher-proof' workbooks as the primary resource for teaching.

10. An industrial award should be developed for teachers working in the program that sets out conditions including minimum teacher qualifications, rates of pay for different teacher levels and leave entitlements.

11. Quality assurance needs to include a pedagogical dimension: it is the pedagogical quality that makes participation in the program meaningful for the participants. Quality assurance should be conducted as a collegial and developmental process with input from practitioners about a quality framework.

12. Establish a funded national agency for professional development and learning.

13. Include the sharing of resources, curricula and approaches with the whole of the SEE community as part of the tender requirement. The program is publicly funded, and providers should be required to share materials and initiatives they develop out of the public funds. The professional development and learning agency can act as a clearing house.

Response to Discussion paper questions:

Job seeker access and engagement

1. What changes could be made to the SEE program to help job seekers understand its benefits and increase their willingness to participate in the program?

Not all recipients of Centrelink benefits are ready for accredited training. For example, they may be:

- Unable to articulate their existing skills and knowledge and/or their needs, goals and aspirations; and
- Uncertain or anxious about participating in group-based learning.

Availability of a non-accredited, personalised program that supports such learners' re-entry into an education and training environment is necessary. Such a program be based on a curriculum that is developed by the teacher around each learner's personal learning plan and support their transition into accredited training should that be an appropriate step towards achieving their goals.

The SEE Transition to Work program for registered job seekers should be re-introduced. This was discontinued in the SEE 2018-2023 contract and included 40 hours of work experience component, developed valuable employability skills and led to successful work outcomes for clients.

2. What additional support could be provided to job seekers with barriers to participation to help them enter and stay in the SEE program?

Adults who have carer needs may not be able to participate consistently in accredited training, adding to their disadvantage. For these adults, the program should ensure that:

- Free, on-site childcare is available
- Assistance be provided to help them access other support for primary carers for family members who are elderly, ill or have a disability.

Adult learners must be confident that the program provides a safe and supportive learning environment and offers training/ education that addresses their needs and goals. Thus, in addition to the above, the program providers must ensure that learners have access to:

- Free, onsite counselling service that works with the provider to improve accessibility for the learners who access the service
- Free, on-site career counselling service to help the learners explore, reassess and set their goals, and also connect with them with external stakeholders including local employers
- An on-site Indigenous education officer
- A distance mode option

The program provider must be located where participants can attend using public transport.

Program participants will need to be provided with access to ICT resources not only during class but outside the class, for example in a computer room. Distance learners must be

provided with a device and alerted to ways in which they can access the internet and printing for free.

Training delivery

3. Should the SEE program include the limited use of non-accredited training to support the engagement of job seekers? If so, what criteria could be used, including to provide quality assurance?

As mentioned in response to question 1, non-accredited training for adults who are not ready for accredited training is necessary.

Additionally, for program participants who are unsure of their career goals, "taster programs' in a wide range of VET courses should be made available. Such programs should be designed to provide program participants with –

- An introduction to an industry in which they may be interested and the range of opportunities available within it
- An introduction to VET study that could ease their transition into an accredited VET course

Criteria such as client's ACSF level at PTA could be used to ascertain the suitability of non-accredited training. A structured individualised learning plan which sets out a participant's pathway into accredited training could be used to measure progress.

4. What are some of the challenges that arise when LLND delivery is embedded in vocational training?

The challenges of embedding/ integrating LLN(D) in VET courses are well researched and documented, along with models of effective delivery.[i] Embedding LLND delivery into vocational training requires:

- Mutual respect between the LLND and the vocational teacher about their respective expertise
- Experience of the LLND and vocational teacher in working together
- Sufficient time for teaching and learning so learners have time to develop the LLND skills needed to learn the vocational content
- Participation of the LLND teacher both in the 'theory' classes and the authentic workplaces and/or workshops so that both the academic and workplace LLND needs are addressed

5. What additional support is needed to deliver LLND embedded in vocational training to job seekers?

Professional development is required for both the LLND and the vocational teachers to work together. Additionally, the time for joint planning is needed to ensure the success of their collaboration.

6. Should the SEE program prescribe LLND specific courses for clients with low levels of LLND? What prescriptions should be required?

No, providers should retain the flexibility to select accredited or non-accredited training to meet clients' diverse training needs, specific goals and spikey ACSF profiles.

7. Should distance learning continue in its current form or should all providers be given the opportunity to deliver distance learning? If so, how can this be managed to ensure face to face delivery is the primary delivery mode?

During the COVID lockdowns, many providers were forced to deliver in distance mode with little time and resources. While they should all be congratulated for their effort and achievements, the next contract must focus on pedagogical quality and capacity for quality delivery. Distance delivery must be more than provision of self-study materials. It must be as responsive to individual needs as face-to-face delivery, and incorporate interactions between the teacher and the learner, and among learners. Distance learners must be provided with ICT devices to enable participation.

Recognising that flexibility of delivery is necessary, a framework for good practice for distance delivery of different types of programs should be developed as criteria for providers including distance delivery in their tender. For example, there are very different strategies needed for distance delivery of:

- individualised non-accredited pathway programs
- LLND learner support in vocational programs
- Distance delivery for programs focusing on English language learners

To ensure face to face delivery is the primary delivery mode, solutions to the barriers to participation in questions 1 and 2 must be addressed and demonstrated.

While we support making face to face delivery the primary mode, there will be the need for distance delivery in some more remote areas and also for some learners. Some learners who attend face to face may, from time to time, not be able to attend and need to continue in distance mode. Clear guidelines are needed for eligibility for distance provision.

8. What else should the department consider to ensure client needs are the driver of delivery modes offered by the SEE program?

There is a need for individualised programs where individual needs and goals are negotiated and are used to place learners in the most appropriate program according to their needs and goals. There is little point in placing an adult who is determined to pursue a career as an auto-mechanic with a group that is learning about childcare traineeships because that is the focus that the teacher or the college had chosen for the group. Ensuring there is a diversity of programs to optimise the chances of learner success and benefit is critical. This means the referring agency must be much more informed about the different programs that are available from different providers.

9. What else should the department consider to ensure distance learning meets the needs of clients who require this mode of delivery?

If learners choose distance learning because they are not confident to learn in a group situation, consideration should be given to helping the learner to develop the confidence for face-to-face group learning. In many situations, the development in confidence to interact with others would benefit the learner's opportunities to participate and succeed in both further education and work. However, for some learners, this may require a staged transition from distance to face to face learning.

10.   What future opportunities are there for using project-based funding to improve participation and engagement in the SEE program?

The Transition to Work would provide work experience to engage learners and develop employability skills (see response Q1)

11.   Does the Certificate IV in Training and Assessment (or equivalent) appropriately equip teachers to deliver "best practice" training to SEE clients? If yes, why? If not, why not?

The Certificate IV in Training and Assessment does not appropriately equip teachers to deliver "best practice" to SEE clients. This is because this qualification has only one unit focused on LLND, which is wholly inadequate. Teaching in the SEE program, and in adult LLND more generally, requires the equivalent degree of knowledge of school teachers, that is subject content knowledge (knowledge about language, literacy, numeracy and digital skills) *and* specialist pedagogical knowledge for teaching LLND.

The SEE program should ideally include programs tailored to different outcomes to align with the diverse range of goals learners bring:

- – Non-accredited LLND program for those learners not ready for accredited training
- – LLND learner support in vocational courses
- – Generalist LLND courses for English language learners who do not have a specific vocational/ occupational goal
- – Generalist LLND courses for learners for whom English is their first language who do not have a specific vocational/ occupational goal

Each of the above types of programs requires specialist LLND expertise which is not addressed in the Certificate IV in Training and Assessment.

It is important that at every college, there is a critical mass of teachers who hold recent specialist postgraduate university qualifications so that they bring current research-based knowledge that can inform and renew the pedagogical approaches. There is new knowledge emerging in the field that cannot be reflected in training packages in a timely manner, and being delivered by the VET sector, the training package qualifications cannot guarantee to be delivered by research-informed teacher educators.

To address the skills and knowledge needs of SEE practitioners, a national professional development agency should be established with 'branches' in each state and territory. Each branch would be composed of people drawn from experienced practitioners to form a professional development and learning hub of SEE practitioners. This agency would be tasked with:

- Providing a clearing house for teacher and learner resources;
- Developing a suite of professional development courses for career changers who are seeking to work in the program; and
- Organising professional development workshops and webinars on specific topics/ issues that are raised by practitioners.

Courses developed for career changers should be designed to articulate into postgraduate specialist university qualifications.

12.   Should the SEE program mandate minimum qualifications for teachers to better support the clients? If yes, what should they be? If not, why not?

The SEE program should mandate a minimum qualification: a postgraduate specialist adult LLND teaching qualification for teachers who have independent responsibilities for a class. The qualification must, as a minimum, include subjects that clearly address:

- Adult learning theories and principles
- Knowledge about language (i.e., educational linguistics)
- Principles and practices of spoken language teaching
- Principles and practices of literacy teaching
- Principles and practices of numeracy teaching
- Programming and assessment principles
- Multiliteracies and multimodal teaching principles and practices (including digital literacies)
- Supervised practicums

A SEE provider may engage a teacher's aide, for example, a bilingual teacher's aide, without the above qualification to work alongside a qualified teacher after completing appropriate professional development courses developed by the national professional development agency (see response to question 11 above).

It is important that there is a SEE teachers' industrial award that sets out the minimum qualifications as well as other details related to working conditions and pay rates so that there are some minimal protections of quality and protections for teachers, and tenders are not won by those who can offer the least expensive tender.

13.   Noting that the SEE program does not directly employ teachers, how else can the SEE program provide reasonable support for teachers?

See the response to the previous question about an industrial award for SEE teachers.

Reinstate a professional development agency (see response to questions 11, 12 and 24)

Payment model

14.   What should the department consider in reviewing the SEE payment model?

15.   What costs are faced by SEE providers which need to be accounted for in the payment model?

16.   If the department were to adopt a model based on payments on achievement of milestones would this impact the business of delivering SEE? If yes, how? If no, why not?

17.   How do you think the application of loadings could support better engagement of disadvantaged cohorts?

Performance

18.   Are the proposed KPIs outlined in the table above appropriate? If yes, why? If no, why not?

19.   How often should a client's LLND progress in the SEE program be assessed?

Formal summative assessments should, where possible, be integrated across contemporaneous units. There should be frequent formative assessments with both oral and written feedback throughout the training period.

There should be a distinction made between assessment for and of learning, and assessment reporting for accountability purposes. The former should be designed and implemented by the teacher, taking account of the learners, their contexts and needs. Formative assessments in particular, should be designed and conducted to inform learning and teaching, and therefore is by definition dynamic and not able to be externally designed ahead of time.

There should be fewer assessment points, at PTA, at a midway touch point and a final assessment of learning, rather than 200- hour Progressive Assessments. This would reduce the administrative and reporting load and free up resources to put into quality program delivery.

20.   What other assessment strategies could reduce over-assessment while still meeting regulatory and program requirements?

Project/ problem-based learning and assessment, self-assessment against the learner's individual learning plan, peer-based assessment should all be part of the assessment repertoire. Project/ problem-based learning and assessment in particular affords opportunities for the learners to demonstrate knowledge and skills in an integrated way, thus making it useful for assessing across several different units.

21.   What other factors should be considered to measure service delivery effectiveness to achieve the SEE program's outcomes?

Additional factors that can be considered include:

- Appropriateness of class sizes for the nature of the cohort.
- Infrastructures such as the college premises should be examined, for example the size of classrooms, spaces for students to socialise in-between classes and during breaks, a computer room and library where students can engage in self-study.
- Availability of services for students such as those listed in the response to Question 2.

Quality assurance

22. What do you think could be improved or prioritised within the current quality assurance provider role?

The quality assurance provider could prioritise:

- A more collegial (multi-provider) approach to developing and expanding the assessment banks *with* the practitioners;
- A greater focus on pedagogical quality – curriculum, delivery, assessment feedback (to learners); and
- Developing case studies of exemplar student performances against the ACSF.

(See also our response to questions 11, 12 and 24)

23. How can the quality assurance process be streamlined for SEE providers while providing similar or better levels of assurance?

There must be clearer guidelines for completion of Pre-Training Assessments and availability of model completed PTAs, and Progressive Assessments.

The quality assurance process of the (pedagogical aspects) of the SEE program could be more productively used if it were understood in the context of organisational and sector-wide learning and development. Just like any assessment of learners in the program should be differentiated according to whether it is assessment prior to learning (diagnostic), assessment for learning (during) and assessment of learning (summative), providers ought to be assessed

- *Prior* to being contracted to establish the type(s) of program they are best placed to deliver;
- *During* the contract to show how they are progressing in relation to what they have been contracted to deliver, be provided collegial feedback and provide feedback to the quality assurance provider/ Government about how they could improve their systems of support; and
- *At the end* of the contract to review, share and reflect what they have achieved. This should then be used to inform both the provider's and the sector's future organisation/ sector learning and development.

In other words, the data collection undertaken as part of 'quality assurance' should be actively used to inform continual improvement for the community of providers, rather than evidence for punitive measures. Therefore, in selecting the quality assurance provider in the next contract, capacity to work collegially with practitioners and innovative approaches to supporting organisational and sector learning should be included in their selection criteria. In our response to question 24 below, we suggest the establishment of a national professional development agency that could coordinate the pedagogical quality assurance of the program.

24. How should the quality of training be evaluated / measured?

The National coordinating professional development agency (see response to question 11) should be given carriage of the quality evaluation of training so that evaluation is undertaken as a collegial process of continual improvement and an occasion for sharing and

learning from examples of good practice. The local state and territory branches of the agency would work collegially with practitioners to develop a framework for good practice and support continual improvement and development. The national agency would ensure sharing of learning from the branches.

One strategy a branch could take would be based on a collegial, professional action research approach:

- A group consisting of experienced adult LLND teachers in leadership positions (e.g., senior head/ lead teacher, team leader of curriculum and resource development) from multiple LLND providers, together with an experienced educational researcher, develop a focus group and observation protocol to investigate teaching and learning practices in the program.
- Teams of 3 from the above-mentioned group undertake visits to SEE providers, observe teaching practices, hold focus group interviews with teachers and participants.
- The observation and interview data collected by the different teams will be analysed by the larger group. The analysis will involve identifying examples of good practice and principles underpinning them. These are used to develop a capability framework for program design and delivery.
- Using the capability framework, difficulties and problems in design and delivery are identified, and solutions and strategies for improvement are formulated as feedback to the relevant providers.

Such an approach would strengthen the local quality assurance process and build practitioner research capabilities in the sector. It would also, at least to some extent, help to overcome the barriers to collegial professional learning presented by competitive tendering.

The professional development agency should also be tasked to develop a suite of professional development courses to develop the knowledge and skills needs of new practitioners the sector. Such courses would be more directly relevant and appropriate for practitioners working in LLND programs and could be designed to articulate into postgraduate specialist university qualifications.

Procurement

25. Do you think a longer contract duration will provide more value to clients and government from the SEE program? If so, why? If not, why?

26. Do you think a multi-provider model will support increased access to training in the SEE program? Why?

A multi-provider model would increase the quality, access and effectiveness of the SEE program if each provider identifies and demonstrates the particular type of program they have demonstrable strength of expertise to add and if referrals are conducted to align the learner's needs with the relevant strength of the provider.

For example, if a learner is keen to start a vocational course and requires LLND learner support, they should be referred to a provider with a large range of vocational offerings and established LLND learner support arrangements. If a provider has strength of expertise in

teaching English language learners (e.g., teachers with adult TESOL qualifications, bilingual teachers' aids, multilingual - in the learners' community languages, ESOL teachers) then English language SEE learners should be referred to that provider. In other words, a multi-provider model should build on each provider's strengths in order to be able to refer participants to the most suitable program provider.

27. Do you think specialist service delivery to groups of learners with certain characteristics/needs will improve engagement and attainment in the SEE program?

Yes. A one-size-fits-all approach is disrespectful and ultimately unproductive for the program participants. See above.

[i] Black, S, & Yasukawa, K (2011). *Working together: integrated language, literacy and numeracy support in vocational education and training.* Centre for Research in Learning and Change, University of Technology Sydney., <https://www.uts.edu.au/sites/default/files/working-together-report.pdf>.

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