ACTA

AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

NATIONAL ROADMAP

FOR

ENGLISH AS AN ADDITIONAL LANGUAGE OR DIALECT EDUCATION

IN SCHOOLS

DIRECTIONS FOR COVID-19 RECOVERY AND PROGRAM REFORM

May 2022

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Abbreviations

AC	Australian Curriculum
AERO	Australian Education Research Organisation
ACARA	Australian Curriculum and Assessment Authority
ACTA	Australian Council of TESOL Associations
ANAO	Australian National Audit Office
ASCF	Australian Core Skills Framework
AITSL	Australian Institute for Teaching and School Leadership
AMEP	Adult Migrant English Program
ATWD	Australian Teacher Workforce Data Collection
DESE	(Commonwealth) Department of Education, Skills and Training
EAL	English as an additional language
EAL/D	English as an additional language or dialect
ELP	(Low) English language proficiency (loading)
EOI	Expressions of interest
ESA	Education Services Australia
ITE	Initial Teacher Education
LBOTE	Language Background Other Than English
LLND	Language, Literacy Numeracy and Digital literacy
NAPLAN	National Assessment Program – literacy and numeracy
NSRA	National Schools Reform Agreement
NPI	National (Schools Reform Agreement) Policy Initiative/s
NSRB	National School Resourcing Board
QITE	Quality Initial Teacher Education (review)
SEE (Program)	Skills for Education and Employment (Program)
TESOL	Teaching English to speakers of other language
TRA	Teacher Regulatory Authority
VET	Vocational Education and Training

INTRODUCTION

English is a fundamental resource for learning in Australian education. Learning to understand, speak, read and write English competently is vital for all student in schools for their social interaction, educational success, access to further education, training and employment, and full participation in Australian society.

The Australian Council of TESOL Associations (ACTA) is the peak body representing state and territory associations of educators dedicated to furthering the learning of English as an additional language or dialect (EAL/D).[1] Association members include EAL/D teachers, consultants, curriculum developers, teacher educators, other academics and researchers in school and pre-school, school, tertiary, adult migrant, VET and community education settings. This National Roadmap presents ACTA's proposals for improving EAL/D provision in Australian schools over the next three years.

Learning English as an Additional Language or Dialect (EAL/D)

Australia has over 600,000 students across all years of schooling who are learning English as an additional language or dialect and are at varying levels of proficiency in English and other languages.[2] They include newly arrived and Australian-born migrant-background students, refugee students (some with little or no previous formal schooling), international students with age-equivalent education, some Pacifica students, and Aboriginal and Torres Strait Islander students who speak traditional Aboriginal Languages, creoles and/or newly emerging contact language/dialects, and who have varying degrees of exposure to Standard Australian English.

Research has consistently confirmed English language learning timeframes for minority-group learners in English-medium schooling. For beginner or near beginner learners, achieving basic fluency in spoken English in immersion contexts typically takes about two years. However, a minimum of five to seven years is generally required to achieve the necessary English language and literacy skills for comparable academic performance with English speaking peers.[3.] The major educational risk for these students is the failure to progress from fluency in everyday spoken English to academic proficiency, resulting in language plateauing, literacy ceilings and academic underachievement.[4] An additional factor is the level of literacy in the home or other languages that learners bring to their schooling. Students with disrupted education and/or little to no literacy skills in any other language may take between seven to twelve years to develop the English needed to achieve academic parity with their English-speaking peers.[5]

The situation for Indigenous EAL/D learners in remote communities is quite different. In the Northern Territory, for example, more than 8 out of 10 people in remote communities speak an Indigenous language. Young people do not use English outside school for social, emotional, practical or other purposes. Learning English is therefore like learning a foreign language. In these contexts, learning English is most effective if it is supported by two-way bilingual and bicultural learning with a strong emphasis on grounding English literacy in fluent and meaningful spoken English.[6] In urban NT, Far North Queensland and parts of Western Australia, creoles and newly emerging contact varieties are the starting point for developing proficiency in the Standard Australian English of the curriculum.

Provision for EAL/D learners at risk

Specialist English language provision in Australian schools to support EAL/D learners' participation and achievement in the English-medium curriculum has been a world-leading access and equity educational strategy. It responds to Australia's post-War immigration program and its increasing culturally and linguistically diverse population. In contrast, the EAL/D learning needs of our Indigenous school population have not consistently received similar dedicated resourcing from the Commonwealth.[7]

Over the last two decades, Australia's national effort, commitment and capability through this equity provision has faltered. EAL/D learners have disappeared as a national equity cohort from the 2008 Melbourne and 2019 Alice Springs education declarations.[8] As elaborated in this document, the Commonwealth Government has devolved all responsibility for EAL/D education policy and service provision to state and territory governments.[9] The Gonski funding reforms have not resulted in transparent or accountable English language funding in schools and systems.[10]

School autonomy policies and their one-line/global budgets have resulted in the downgrading of service provision for Indigenous, refugee and migrant-background EAL/D learners. This is marked by the disappearance of EAL/D-qualified teachers and leaders in schools, diversion of earmarked funding away from EAL/D learner support, EAL/D programs subsumed within other school programs and dissipated EAL/D services in schools.[11] At a systemic level, education authorities in all states and territories have downsized or abolished their specific-purpose professional administrative units and personnel responsible for coordinating, advising and supporting schools with EAL/D learners. The system's corporate knowledge has been lost, along with support for EAL/D professional learning and expertise in EAL/D assessment.[12]

This widespread erosion of EAL/D service provision coincides with the persistent stagnation in Australia's overall student performance in literacy as measured on NAPLAN and the steady decline internationally as measured by literacy tests, PIRLS and PISA.[13] It also accompanies the documented failure of the Gonski funding reforms to address the growing social and educational disadvantage in Australian schools over the last decade.[14]

COVID-19 impacts

COVID-19 is not a single static event but an unfolding global emergency with continuing impacts.[15] Previous and potential future emergence of COVID-19 variants and waves of infection challenge governments and societies to make short-term adaptations while also preparing to address foreseeable, longer-term effects.[16]

Estimations of the pandemic's effects on student learning highlight its uneven and potential long-term impacts,[17] especially for disadvantaged students.[18] Existing material, digital, dispositional and home support disadvantages have been exacerbated.[19] For EAL/D learners, COVID has created a language learning divide by restricting the immersion contexts these students need to develop spoken English fluency in everyday, face-to-face interaction with peers and teachers.[20] Research on the impact of COVID-19 on EAL/D learners has revealed significant disruption to their school learning and regression in English language skills and acquisition.[21]

To date, there has been no proactive educational response to the unfolding crisis.[22] The move to remote learning has increased existing gaps in English language support for EAL/D learners. Intensive English centers and classes in many state and territory education systems have been disbanded, scaled back or used as a means of retaining generalist, non-EAL/D trained school staff. Short-term, 'catch-up' tutoring programs have not targeted the needs of EAL/D learners.[23] If these gaps are not addressed through specific support measures, EAL/D learner disadvantage will be further entrenched[24] and the achievement of nationally agreed education goals and targets for all students will be undermined.

EAL/D education recovery and reform

Amid ongoing uncertainty about living with COVID-19 and the establishment of a 'new normal', state and territory Governments have reopened schools and implemented COVID-safe protocols.[25] It is becoming increasingly clear that, for all students, educational recovery must include a greater emphasis on their wellbeing.[26] A pandemic-resilient education system must support engagement in teaching and learning in socially-distanced face-to-face classes as well as remote online learning.[27] To ensure that EAL/D learners are not overlooked, a national plan for EAL/D education recovery and reform is essential. This plan must address pre-existing weaknesses in EAL/D policy and service provision as part of a broader post-pandemic, 'build back better' reform agenda.[28]

To this end, ACTA has specifically aligned the twelve key Actions of the *National Roadmap for EAL/D Education in Schools* to the Reform Directions and National Policy Initiatives in *National Schools Reform Agreement.* The Reform Directions are:

> A. Supporting students, student learning and student achievement
>
> B. Supporting teaching, school leadership and school improvement
>
> C. Enhancing the national evidence base.[29]

Implementing the National Schools Reform Agreement to benefit Indigenous, refugee and migrant EAL/D learners requires implementation of the twelve Actions set out in the ACTA *Roadmap*.

Successful language learning requires sustained effort. Accordingly, the ACTA *Roadmap* is matched to the final two years of the current *National Schools Reform Agreement* (2022-2023) and extends to the first year of the forthcoming 2024-2028 national education agreement. Our goal is for these twelve Actions to explicitly inform the forthcoming agreement.

Success in implementing these Actions will require focus and leadership. A national agency is needed to support, report on and evaluate EAL/D education reforms and to develop national EAL/D data capability. Its leadership team should have the appropriate expertise in addressing EAL/D policy and provision for refugee, migrant and Indigenous EAL/D learners in urban, regional and remote settings, and in national collaboration with state and territory education systems. This agency could be a stand-alone unit or part of a wider brief directed to policy and provision of the six 'Gonski' equity loadings (and their intersections), one of which underpins EAL/D funding (see Action 1).

As Australia emerges from the pandemic and resumes immigration in the national interest,[30] national leadership is needed to restore our leading role in EAL/D education. ACTA calls on Commonwealth and state and territory Education Ministers to commit to rebuilding dedicated, effective English language and literacy provision for the full cohort of EAL/D learners, including Indigenous EAL/D learners. This *Roadmap* specifies the necessary Actions in any such commitment.

A. Supporting students, student learning and student achievement

ACTION 1: Restore adequate needs-based funding for migrant, refugee and Indigenous English language learners

Problem

Following the 2011 'Gonski' Review, the Commonwealth Government adopted needs-based funding for schools. Schools are now funded according to a per student base amount and six additional 'equity' loadings.[31] Of these, the 'low English language proficiency' (ELP) loading is allocated for students who are educationally disadvantaged due to their limited English. The current loading amount is inadequate,[32] inequitable[33] and tokenistic.[34] For Government schools, it does not fund a single day's English language instruction at current teacher salary rates[35] and constitutes a major reduction in Commonwealth funding from the previous English as a Second Language New Arrivals per capita grants ($5,039 in 2005) that bear no relation to previous modelling.[36] In regard to Indigenous learners, the Aboriginal and Torres Strait Islander disadvantage loading does not relate to students' English or first language needs.[37] These students may also attract the low English proficiency loading but the Commonwealth Government has no information on them.[38] The formula used to identify students with low English language proficiency and calculate the loading is not a valid English proficiency measure and does not capture those with English learning needs or the amount of support needed (see Action 10).[39] There is no substantive accountability that attaches to the use of these funds (see Action 11). Since the inception of the low English proficiency loading, there have been no reviews, evaluations or modelling of the loading to determine its validity, adequacy or fitness for purpose.[40]

Solution

As a matter of urgency, the NSRB should review, the low English proficiency loading to determine the extent to which it adequately reflects the cost of providing effective English language instruction to students with EAL/D learning needs. A National EAL/D Needs Index should be developed that includes the ACARA EAL/D Learning Progression as the agreed measure of English language proficiency.[41] The Index should include key indicators that reflect students' English learning starting points and that affect their progress towards the level of Standard Australian English needed for effective school participation. It should also specify commensurate levels of EAL/D support.[42]

Benefits

This Solution would address current funding anomalies and provide a nationally recognised, consistent, evidence-based framework for needs-based funding for the EAL/D learner cohort, and a transparent needs-based allocative mechanism for the use and intended and actual outcomes of the loading.

Policy context

This Solution accords with the NSRB's statutory requirements under the Australian Education Act 2013 (Cth) to provide independent oversight of Commonwealth school funding arrangements, and review different parts of the funding model to ensure (i) public confidence in the model, (ii) that states, territories and other approved authorities meet their statutory obligations, (iii) that the funding model is using the best available data and methodologies, and (iv) that funding is used in line with the Act.[43]

Implementation

NSRB should develop the EAL/D Needs Index in collaboration with DESE and the independent national evidence institute, AERO, utilising appropriate expertise in modelling and validating EAL/D need factors. This project would require further development of state and territory jurisdictions' EAL/D data collection capabilities.

2022	*2023*	*2024*
NSRB review the low English proficiency loading.	• **Implement review recommendations.** • **Develop & trial EAL/D Needs Index.** • **Develop jurisdictions' data capability** • **National data sharing agreements.**	**Implement EAL/D Needs Index as part of new NSRA.**

Supporting students, student learning and student achievement

ACTION 2: Upgrade EAL/D teaching and learning resources in the Australian Curriculum

Problem

The updated Australian Curriculum endorsed by Education Ministers after a 2020/21 review will be available on the Australian Curriculum website in Term 2, 2022. The Student Diversity section contains EAL/D resources initially published in 2014 after the curriculum was first developed in 2010. The introduction of the new curriculum means that all elements of the EAL/D website resources require clarification, updating and revision. The EAL/D annotated descriptions for English, Maths, Science, History are now misaligned and are insufficient for remote schools where EAL/D specialists are unavailable.[44] Disability legislation and related policy documents (e.g. the *Disability Discrimination Act* 1992 and the *Disability Standards for Education* 2005) referenced in the EAL/D section of the AC website do not provide appropriate principles or frameworks for teaching EAL/D learners,[45] nor is their relevance explained. The advice on planning for EAL/D diversity does not reflect an explicit and systematic approach to language-based curriculum planning and learning support.[46] The video illustrations of practice do not show EAL/D teaching in intensive and mainstream settings across jurisdictions or in different learning contexts (e.g. urban, regional, remote). Further, there is no reference to or examples of EAL/D teaching of Indigenous students.[47] The links to state and territory EAL/D resources are not all current and the status of the *Progression* and *Elaborations* in relation to state and territory requirements and resources is unclear. There are no connections between the AC website EAL/D resources and the phases and descriptors in the ACARA *EAL/D Learning Progression*. The *Progression* needs refining to improve teacher accessibility. Most teachers, including those with EAL/D responsibilities, have little or no knowledge of current AC EAL/D resources or how to utilise them (see Actions 5 and 7).

Solution

EAL/D resources in the Student Diversity section of the AC website should be comprehensively revised. It should be a key professional learning hub that is aligned with the new curriculum and exemplifies best EAL/D pedagogy practice for the *whole* cohort of EAL/D learners, including Indigenous EAL/D learners, in intensive and mainstream settings in all Australian schools. Revisions should include: the EAL/D overview and advice, planning for EAL/D diversity (including the intersection with other 'Gonski' needs factors), the EAL/D annotated content descriptions, links to state and territory resources, frameworks and requirements, and video illustrations of practice. Where appropriate, resources should be referenced and linked to the phases and descriptors of a refined ACARA *EAL/D Learning Progression,* illustrated with learner work samples, and supported by key research references on EAL/D teaching and learning.[48] ACARA should offer teacher workshops on using these resources in collaboration with all subject area professional associations.

Benefits

This Solution would ensure that the Australian Curriculum is inclusive and promotes best practice and evidence-based EAL/D pedagogy. It would provide a valuable national resource for EAL/D professional learning.

Policy context

This Solution aligns with NPI commitments to: A(i) 'enhance the Australian Curriculum to support teacher assessment of student attainment and growth against clear descriptors'; A(i)c) that 'existing and new learning progressions and formative assessment capability for agreed Australian curriculum areas and general capabilities are progressively made available,'[49] also with ACARA's commitment to supporting implementation of the new curriculum by sourcing and developing teacher resources for teachers in changed content areas.[50]

Implementation: ACARA in collaboration with ESA and EAL/D stakeholders, teachers and experts.

2022	*2023*	*2024*
EAL/D expert working group & writing team established. Scoping & review of AC website EAL/D resources. Consultative development and publication of EAL/D professional learning hub.	National evaluation & refinement of the EAL/D professional learning hub. Protocols for further updating and additions to the resource.	Ongoing implementation and development of the EAL/D professional learning hub under the new NSRA.

Supporting students, student learning and student achievement

ACTION 3: Leverage quality bi-lingual, bi-literacy education to improve Indigenous students' achievement in remote school communities

Problem

An estimated 26,600 First Nations school students speak Australian Indigenous languages. These include traditional languages, mixed languages, creoles and English-based dialects. Most of these speakers live in remote areas with minimal contact with Standard Australian English.[51] The crucial place of their languages in Indigenous students' lives and communities – and therefore their engagement with school and the curriculum[52] – has been consistently ignored in policy, plans and reviews of Indigenous education.[53] Effective education in Indigenous school communities has been systematically undermined by funding cuts to bilingual/bi-literacy programs,[54] loss of Indigenous teachers and teacher assistants caused by diminished funding and by the closure of special purpose Indigenous teacher training and professional development, invalid English literacy testing,[55] 'English only' literacy interventions,[56] costly, serial importation of culturally alien English remedial literacy programs from the USA and UK, lack of qualified EAL/D teachers, employment of inexperienced classroom teachers, and short-term teacher contracts.[57] Single-line budgets and punitive resourcing tied to school attendance have created a vicious cycle undermining schools' ability to offer quality teaching, particularly in remote areas.[58] Accountability and transparency in use of Commonwealth funding is weak or non-existent (see Action 11). Piecemeal strategies for remote Indigenous students fail to address fundamental issues and, in some cases, exacerbate problems.[59] It is no surprise that successive *Closing the Gap* reports document repeated failure to meet two key educational targets for Indigenous students – school attendance, and English literacy and numeracy achievement.[60] The failure is greatest in remote areas and worst in the Northern Territory, where 30 per cent of the student population are Indigenous and 25 per cent live in very remote areas.[61]

Solution

The Commonwealth Government should develop and lead a **National Languages and Literacy Education Strategy** for Indigenous students in rural and remote schools. This should be done in collaboration with relevant Indigenous leaders, headed by a National Coordinator-General for Indigenous Education, advised by a representative, expert Council with recognised expertise in education, linguistics and language learning.[62] The Strategy should aim to leverage students' home languages and develop EAL/D learning resources for cultural agency, school engagement and academic achievement. It should establish a network of schools with both-way bilingual/biliteracy programs that are co-designed with local communities,[63] supported by quarantined matched funding from state and territory governments, and informed by language research.[64] It should be accompanied by reinvestment in training and employing Indigenous teachers in remote, regional and urban schools.

Benefits

This Solution would enable clear visibility and accountability for effective resourcing, educational participation and outcomes in targeted schools. Creation of a transformative schools network would assist in developing local innovation and professional expertise, improving Indigenous students' learning. The Strategy would provide focus for developing a research and evidence base to underpin policy, planning and practice in Indigenous education.

Policy context

This Solution aligns with, and would strengthen, the Australian Government's 2020 ten year National Agreement on Closing the Gap.[65] The focus on Indigenous teachers accords with the 2021 Early Childhood Care and Development Sector Strengthening Plan component of the Closing the Gap Agreement. [66]

Implementation: DESE in collaboration with AERO and state and territory jurisdictions.[67]

2022	*2023*	*2024*
Appointment of Co-ordinator-General, steering & stakeholder advisory groups to develop the Strategy. Community and jurisdiction consultations. Review of research. Schools network and professional support established, and staffing allocated. Monitoring protocols developed.	Monitoring of network and school implementation plans. Collection and analysis of student and other data. Research studies conducted.	Action evaluation. Initial research reports & dissemination of findings. Incorporation of review and research findings into Indigenous education policy. Stable targeted funding under new NSRA.

Supporting students, student learning and student achievement

ACTION 4: Guarantee education, training and employment pathways for educationally vulnerable Indigenous, migrant and refugee youth

Problem

Secondary-aged Indigenous youth with low English language and literacy, including those in contact with the justice system, are at a higher risk of school disengagement, and inability to complete their secondary education and access vocational training and employment.[68] Rigid VET competency-based programs do not meet these students' learning needs and can be irrelevant to the employment opportunities in local communities.[69] Similarly, recently arrived refugee youth who lack age-equivalent prior schooling and have low English language and literacy skills and are at risk of dropping out of school and not accessing further education, training and employment.[70] There is no national policy framework or dedicated systemic approach to providing flexible, consistent and effective pathways to senior schooling or training and employment for educationally vulnerable young people from migrant, refugee and Indigenous backgrounds.[71] Over the last two years, the COVID-19 situation has disadvantaged school leavers and severely restricted school and post-school education, training and employment opportunities which are essential for young people's social, economic and civic participation, and mental health and wellbeing.[72]

Solution

Targeted, flexible education, training and employment pathway programs should be implemented for Indigenous, migrant and refugee young people aged between 15 to 25 as part of a **National Action Plan within the Youth Jobs Guarantee**.[73] These programs should offer English language, literacy, numeracy and digital literacy, with essential Science, History and Geography, and social and work-related knowledge and skills. They should be relevant to local communities but also include pathways into credentialed training courses, traineeships, work experience and community volunteering opportunities, and be developed in collaboration with business, industry and community organisations.[74] Co-designed, culturally appropriate, wrap-around wellbeing and vocational counselling support is essential.[75]

Benefits

Development and implementation of this Solution would create a nationally coherent approach to education, training and employment pathways and opportunities for these educationally vulnerable young people. Good practice models would provide a sound national evidence base for on-going policy and planning in this area.

Policy context

This Solution aligns with: (a) the NPI commitment A(iii)b) to 'consider recommendations for any national initiatives to strengthen student pathways,'[76] (b) the August 2020 NSRA commitment to: stronger support for foundation skills and access to training for all Australians with low levels of language, literacy, numeracy and digital literacy; providing VET pathways for secondary school students; and employment based training,[77] (c) the 2020 Education Council commitment to progressing selected recommendations from the *Report of the Review of Senior Secondary Pathways into Work, Further Education and Training,*[78] and (d) the report of the 2022 Parliamentary Inquiry into the Importance of Adult Literacy recommendation for a national LLND Action.[79]

Implementation

DESE in collaboration with AERO, jurisdictions and VET, youth, community and employer stakeholders.

2022	*2023*	*2024*
Design & development of national pathways Action Plan for Indigenous, migrant & refugee youth, supported by steering, stakeholder and expert advisory groups. EOI, funding grants and contracts.	Implementation & monitoring of Action Plan; an annual report.	National Action Plan evaluated; successful models identified & documented. Provision of a stable targeted funding under new NSRA.

B. Supporting teaching, school leadership and school improvement

ACTION 5: Equip all pre-service teachers to cater for EAL/D learners in their classrooms

Problem

The nature, scale and distribution of Australia's linguistic diversity means that all teachers at all year levels can expect to teach EAL/D learners functioning with varying degrees of English language proficiency in their classrooms.[80] Initial teacher education (ITE) should include learning how to support EAL/D learners in the teacher's curriculum area and to work effectively with the EAL/D specialist(s) in their school.[81] ITE programs are failing in this regard. Currently, only two ITE programs in Australia include mandatory basic EAL/D content. Some ITE programs offer units on diversity/inclusivity and literacy but typically these do not address the academic English and literacy demands of specific curriculum areas or the language-focussed teaching strategies that promote EAL/D learners' social and academic participation.[82] Disappointingly, the 2022 *Next Steps Report of the Quality Initial Education Review* failed to consider this equity cohort and the implications for ITE.[83] The recommendations for mandated phonics instruction in early reading assume that all students have age-appropriate fluency in spoken English, and ignore the significance of oral language and first language literacy skills in learning literacy[84] and the role of cultural and content knowledge in gaining meaning from texts.[85] They do not address the long-term English reading comprehension needs of EAL/D learners[86] across the years and key transitions of schooling.[87] These mono-lingual assumptions are liable to mis-assess EAL/D students' learning needs as stemming from some kind of disability.[88] AITSL's *Australian Professional Standards for Teachers* include vague references to linguistic and cultural issues but do not specify the language-related knowledge and skills required for EAL/D-informed teaching by mainstream teachers, EAL/D-knowledgeable leadership in schools (see Action 7) or specialist EAL/D teaching (see Action 6).[89]

Solution

AITSL *Standards and Procedures* for accrediting ITE programs in Australia should be amended to require a mandatory unit of at least 15 contact hours on differentiated EAL/D instruction for migrant, refugee and Indigenous learners.[90] This unit should provide a basic understanding of the importance of building from spoken language towards literacy and academic uses of English, examining and making cultural assumptions explicit, and methods in: (i) making the English of the curriculum 'visible' to students, (ii) scaffolding students' use of academic English in learning tasks, and (iii) expanding classroom practice opportunities in using the English of different subject areas. These understandings should be developed through a practicum supported by EAL/D focused classroom observation tools.[91] Schools identified as centres of excellence in EAL/D teaching, supervision, mentoring and professional learning should be established as part of a network of school-higher education provider partnerships.[92] The proposed national Centre for Excellence in ITE[93] should include EAL/D education in its teaching, research and evaluation brief.

Benefits

These Solutions would equip beginning teachers with a basic understanding of how to teach effectively in today's Australian classrooms and sensitise them to the linguistic and cultural demands of the different curriculum areas, to the benefit of all their future students. A basic understanding of EAL/D needs would also alert mainstream teachers to the value and benefits of collaborating with the specialist EAL/D teacher(s) in their school.

Policy context

These Solutions align with the NPI commitment B(ii) to 'strengthen the initial teacher education accreditation system'[94] and the QITE review report recommendation on strengthening ITE programs.[95]

Implementation

AITSL in collaboration with state and territory TRAs, ITE providers, and EAL/D stakeholders.

2022	2023	2024
AITSL consultation with EAL/D experts followed by review of EAL/D content and skills development in ITE programs for all teachers. AITSL & ITE providers to identify schools of EAL/D teaching excellence.	Trialling & evaluation of EAL/D compulsory units and school-higher education partnerships.	Revised ITE accreditation requirements instituted under the new NRSA.

Supporting teaching, school leadership and school improvement

ACTION 6: Revive specialist EAL/D teacher education programs

Problem

Specialist EAL/D teachers not only play a vital role in teaching EAL/D learners but also provide the expertise and leadership that enable schools to respond to linguistically and culturally diverse students, their carers and the wider community. This expertise consists of knowledge and skills in four key areas: (i) the English language, (ii) second language acquisition and development, (iii) current resources and techniques in teaching and assessing EAL/D (i.e. curriculum, pedagogy and assessment), and (iv) the sociocultural contexts of EAL/D learning. [96] As with other subject areas, specialist TESOL qualifications should include a practicum supervised by an EAL/D specialist. However, EAL/D specialised teaching knowledge and skills are not referred to or recognised by the national teacher standards and accreditation authority (AITSL) in its *Australian Professional Standards for Teachers*.[97] AITSL does not consider TESOL courses as initial teacher education programs and therefore they are not accredited by Teacher Regulatory Authorities against AITSL's *Accreditation of Initial Teacher Education Programs in Australia: Standards and Procedures*.[98] Consequently, these authorities no longer recognise or require EAL/D qualifications, so EAL/D teacher accreditation requirements have dissipated or disappeared.[99] Devolved school staff decision-making has undermined principals' ability and obligation to employ qualified teachers, including qualified specialist EAL/D teachers. Minimal demand for EAL/D qualified teachers in schools has led most teacher education faculties to discontinue, reduce or reorient their TESOL offerings to focus on generic literacy, cultural diversity and/or TESOL for overseas English language teachers.[100] Content appropriate to teaching and learning English in Australian schools has dissipated or disappeared, along with EAL/D practicum placements. Dependence on revenue from programs for overseas English language teachers has been exposed by COVID-related border closures, resulting in the termination of TESOL programs and retrenchment or forced retirement of expert staff.[101] Although Australia led the world in this field in the 1980s and 1990s, on current trends TESOL expertise at all levels – from schools to teacher educators and researchers – will be lost to Australian education within the next five years.

Solution

In addition to Action 5 above, AITSL should work with EAL/D experts to develop accreditation specifications for specialist TESOL programs from ITE to post-graduate levels.[102] States and territories should be required to report on employment and location of EAL/D teachers with and without TESOL qualifications as part of improved teacher workforce planning (Action 8), and strengthened accountability for use of the low English language proficiency loading (Action 11).

Benefits

Adopting these Solutions would strengthen Teacher Regulatory Authorities' EAL/D teacher accreditation requirements, reverse the continuing deregulation and disinvestment in the area, and counter the decline in TESOL expertise in Australian schools and teacher education faculties. It would allow development of an EAL/D career pathway enabling sustainable recruitment of specialised EAL/D leaders to support effective, evidence-based EAL/D decision-making in schools.

Policy context

These Solutions align with Recommendation 8 in the 2022 report of the Parliamentary Inquiry into the Importance of Adult Literacy that, as part of the 2023 National School Reform Agreement "a proportionate number of qualified … TESOL educators .. be provided, on an on-going basis, to the number of enrolled EAL/D learners in schools".[103]

Implementation

AITSL in collaboration with state and territory TRAs, teacher education providers, and EAL/D experts and stakeholders.

2022	2023	2024
AITSL to work with TESOL experts to review specialist TESOL teacher education programs.	Development of TRA accreditation requirements for specialist TESOL courses.	Revised ITE accreditation requirements instituted as part of the NSRA.

Supporting teaching, school leadership and school improvement

ACTION 7: Rebuild EAL/D professional learning, leadership and school development

Problem

The nature and distribution of EAL/D learners across the years of schooling requires both targeted and whole school approaches to leading and organising EAL/D teaching and learning.[104] School leadership is crucial in creating and supporting these approaches,[105] even more so over the last decade when school autonomy policies have greatly increased the scope of school leaders' decision-making (see Action 11). An unintended consequence of these policies is the widespread erosion of school EAL/D support due to principals' and school leaders' inadequate understanding about EAL/D students' teaching and learning needs, coupled with the lack of accountability in the use of the low English proficiency loading (see Action 11).[106] Mainstream teachers consistently report being ill-equipped to teach EAL/D learners (see Action 5) and identify EAL/D professional learning as a high priority.[107] The vague references to linguistic and cultural issues in AITSL's *Australian Professional Standards for Teachers* offer little guidance or support for EAL/D-informed teaching by mainstream teachers or school leadership.[108] To fill this gap, two national supplementary frameworks were developed: the ACTA *EAL/D Standards Elaborations* and *The Capability Framework for Teaching Aboriginal and Torres Strait Islander EAL/D Learners*.[109] Although these frameworks may be used and promulgated in state systems, they lie outside the AITSL standards framework and therefore have no status in the national system of teacher regulation.[110] Along with inadequate pre-service preparation and the loss of specialist TESOL expertise, on-going teacher professional development on EAL/D issues has effectively become an optional extra undertaken in teachers' own time without support or incentives.[111] The lack of recognition of and access to EAL/D expertise is a major contributor to the failure of most schools across Australia to meet the English language learning needs of Indigenous, migrant and refugee students.[112]

Solution

In addition to Actions 5 and 6, a **National EAL/D Professional Development Strategy** should be developed that aims to grow the EAL/D expertise of all teachers and school leaders and rebuild the EAL/D service capabilities of schools. The Strategy should consist of: (i) development and promulgation by AITSL, for use as a professional learning framework, of supplementary EAL/D elaborations to its *Professional Standards for Teachers,* based on available EAL/D teaching frameworks that identify the knowledge and skills required by mainstream teachers at each career stage in meeting the learning needs of EAL/D students, (ii) development of a whole school EAL/D evaluation and planning tool to inform school leader decision-making towards continuous improvement of targeted EAL/D programs,[113] and (iii) design and implementation of a scholarship-supported national school leadership professional development program aimed at building inclusive whole school systems of EAL/D support.

Benefits

This Strategy would reverse the erosion and improve effectiveness of school provision for EAL/D learners by promoting EAL/D informed school leadership. It would support the development and documentation of best practice in whole-school planning, implementation and evaluation of the EAL/D provision essential to achieving high equity/high quality schooling.[114]

Policy context

This Solution aligns with AERO's role in mobilising high-quality tools to support teaching and learning in school and early childhood education, and supports AITSL professional learning standards at key teacher career stages.

Implementation

DESE in collaboration with AISTL, AERO, higher education providers and jurisdictions.

2022	*2023*	*2024*
Scoping, design and development of the Strategy in consultation with EAL/D experts.	National piloting, monitoring and refinement of the Strategy.	Strategy evaluation. Incorporation of the Strategy as part of quality schooling commitments under new NSFA.

Supporting teaching, school leadership and school improvement

ACTION 8: Institute systematic, national, evidence-based teacher workforce planning that includes EAL/D specialist teachers

Problem

Australia lacks a national approach to teacher workforce planning. Despite longstanding reports predicting teacher shortages, there is little national system data and no modelling to ascertain teacher supply and demand in Australia.[115] Jurisdictions cannot address specific teacher shortages because they cannot obtain ITE data on subject specialisations and geographic locations in a timely manner.[116] After more than a decade of development, the Australian Teacher Workforce Data Collection (ATWD) is still not fully operational,[117] providing a rear-vision only view of the teacher workforce and vague, incomplete and out-of-date information about demand in specialisation areas such as EAL/D.[118] The ATWD fails to identify key drivers of teacher demand and supply, namely: projected growth in overall student enrolments,[119] including growth in number and proportion of EAL/D learners;[120] declining numbers of ITE applicants and shrinking supply of teacher graduates;[121] impacts on quality provision – in particular the increase in 'out-of-field' teaching, including EAL/D teaching – of increased local decision-making and reduced central staffing support under school autonomy policies,[122] increased teacher casualisation and insufficient casual teacher supply.[123] After years of inadequate workforce planning, state education authorities are now forced to fast-track their own teacher supply strategies to address urgent and growing shortages in teaching specialisations.[124] The pool of specialist EAL/D teachers is rapidly shrinking due to attrition, retirements and, as documented above, reduced opportunities to gain EAL/D qualifications.[125] The gap between the English learning needs of EAL/D students in schools and a suitably qualified workforce, evident before the pandemic, continues to widen.[126]

Solution

In conjunction with Actions 5-7 above, the national model of teacher supply and demand proposed by the QITE Review report[127] should include attention to (i) data gaps in the supply, demand, retention, and attrition of specialist EAL/D teachers, (ii) regular public reporting and projections based on EAL/D learner population data, system staffing data and resourcing plans, specialist EAL/D teaching programs, and data on specialist EAL/D graduates (ITE and postgraduate), and (iii) EAL/D teacher recruitment and retention strategies.

Benefits

This Solution would strengthen systems' capabilities in addressing the EAL/D learning needs in Australian schools, assist teacher education providers to plan for specialist EAL/D offerings, help arrest the declining numbers of qualified EAL/D teachers, and improve the quality of EAL/D teaching in schools.

Policy context

This Action aligns with the NPI commitment B(i)d) to 'implement a national teacher workforce strategy to respond to teacher workforce needs of the future, and support decision making of teacher employers and ITE providers'[128] and with the QITE review Recommendation 17 to develop a national approach to teacher supply and demand.[129]

Implementation

AITSL in collaboration with ESA, state and territory TRAs, ITE providers, and EAL/D experts and stakeholders.

2022	2023	2024
Identification of EAL/D data gaps in national workforce planning in consultation with EAL/D experts and stakeholders. Development of national workforce data capability and planning.	Trial and evaluation of new national model involving jurisdictions, teacher education providers and EAL/D experts and stakeholders. National data sharing agreements.	Ongoing implementation of new national model of teacher supply and demand under new NSFA.

Supporting teaching, school leadership and school improvement

ACTION 9: Fast track post-pandemic EAL/D pedagogies of recovery

Problem

Reports of COVID-19 impacts on student learning highlight its uneven and potential long-term effects on many disadvantaged students who have experienced significantly disrupted schooling and learning losses.[130] Compounding their disrupted curriculum learning, most EAL/D learners have experienced specific English learning losses due to substantially restricted opportunities for the everyday, face-to-face interaction with peers and teachers needed to develop fluent spoken English and lost proficiency in recently-acquired, but not-yet-consolidated, spoken and written academic English.[131] At greatest risk are those EAL/D learners negotiating key school and curriculum transitions: recent arrivals, EAL/D learners in the early years, those transitioning from primary to secondary education, senior secondary students, refugees with interrupted schooling, and Indigenous EAL/D learners.[132] While UK research suggests COVID-19 has had significant impacts on EAL students' English language learning, there has been no large-scale research into Australian EAL/D learners.[133] They stand to be further disadvantaged as schools attempt to create COVID-safe face-to-face learning environments, which cause teachers to default to an information-transmission pedagogy because of the difficulties in re-establishing the collaborative and interactive classrooms that promote effective EAL/D learning. If EAL/D learners are to make up for learning losses[134] and achieve academic parity with their English-speaking peers,[135] an EAL/D pedagogy of recovery that accelerates English learning is needed.[136] Such pedagogy involves high-impact interactive teaching in both face-to face and online contexts.[137]

Solution

A co-ordinated national research and development initiative, mobilising specialist EAL/D expertise, should investigate the following: (i) the nature, extent and location of COVID-19 impacts on EAL/D learners in schools, (ii) the effectiveness of intensive tutoring programs for these students,[138] and (iii) high-impact, interactive, face-to face and online EAL/D pedagogies directed to overcoming their learning losses. [139]

Benefits

A national research and development network and program that would provide a coherent and sound evidence base for national policy, planning and practice in EAL/D education. It would also develop effective language and literacy pedagogy applicable to students more broadly.

Policy context

This Solution aligns with NPI commitments C(ii) to 'establish an independent national evidence institute to inform teacher practice, system improvement and policy development' and C(ii)c) that 'the national evidence Institute commences operations from 2020, and inter alia, develops and implements a national research and evidence plan.'[140]

Implementation

AERO in collaboration with the higher education sector and EAL/D stakeholders and experts.[141]

2022	2023	2024
Consultative development of a national EAL/D research & development plan. Research grants, EOI, and commissioning of research.	Implementation and monitoring of EAL/D research & development projects; interim reporting on findings.	Publication and dissemination of findings. Incorporation of R & D findings into education policy. R & D program evaluated, future plans determined.

C. Enhancing the national evidence base

ACTION 10: Implement a nationally agreed measure and method of reporting English language proficiency

Problem

Although EAL/D learners have comprised a significant proportion of the school population for over fifty years, Australia still has no nationally agreed measure for identifying or reporting on their English language proficiency levels or progress.[142] This gap in the nation's education evidence base prevents national identification, effective and accountable needs-based funding, and relevant, accurate reporting on provision and outcomes for this equity cohort.[143] The 2011 Final Report for the Review of the Funding for Schooling ('Gonski Report') recommended funding for EAL/D learners according to their assessed English language proficiency levels. That year, ACARA developed the *English as an Additional Language or Dialect (EAL/D) Learning Progression* as part of the Australian Curriculum.[144] However, Australian governments have continued to rely on an inaccurate and misleading 'disadvantaged LBOTE' algorithm to identify English language learners and subsequently allocate funding.[145] In 2015, national collaborative work was undertaken to address this problem. A framework was developed that aligned various state and territory English language assessment tools to the ACARA *EAL/D Learning Progression.* The resulting *National Framework for Assessing English Language Proficiency* was endorsed by the Education Council in December 2015 but could not be readily implemented. In late 2019, ACARA established a state and territory project working group to review the Framework.[146] Despite strong support from state and territory education authorities for ACARA's work in developing national EAL/D reporting, the project was halted in February 2021 when the data strategy group and the Education Council to which it reported were dissolved along with COAG.

Solution

ACARA should resume this project with a focus on (i) refining the ACARA *EAL/D Learning Progression* to improve its accessibility and reliability for teachers reporting on the English levels and progress of EAL/D learners in schools,[147] (ii) creating an EAL/D student data flag enabling the EAL/D student cohort to be identified and tracked within national data sets, and (iii) developing data capabilities of state and territory jurisdictions to enable nationally comparable EAL/D reporting with a view to incorporating this measure in the next ACARA National Measurement Framework.[148]

Benefits

This Solution is an essential component of the EAL/D Needs Index (see Action 1). It would enable (i) NAPLAN reporting of EAL/D learner performance and progress through the creation of a national EAL/D student identifier, (ii) inclusion of EAL/D learners in the National Report on Schooling, and (iii) Australian governments to track EAL/D learner progress towards achieving the National Goals of the Alice Springs Declaration.

Policy context

This Solution aligns with NPI commitments C(iii) to 'improve national data quality, consistency and collection to improve the national evidence base and inform policy development', and C(iii)b) to 'consider strategic opportunities to enhance the national evidence base, including options for measures of … student learning gain.[149]

Implementation

ACARA in collaboration with AERO, jurisdictions and EAL/D stakeholders and experts in EAL/D proficiency assessment in schools.

2022	*2023*	*2024*
National project resumed to refine and investigate use of the *EAL/D Learning Progression* as a nationally agreed English proficiency reporting measure for the full cohort of EAL/D learners, including Indigenous EAL/D learners.	National trial, cross-validation &refinement of the refined *EAL/D Learning Progression*, including on-going input from experts in English language proficiency assessment in schools. Alignment of state and territory EAL/D collection practices and approaches.	National identification & reporting of EAL/D learners against the refined *EAL/D Progression.* Incorporation in ACARA National Measurement Framework under new NSRA.

Enhancing the national evidence base

ACTION 11: Ensure transparency and accountability in the allocation and use of the English language proficiency loading

Problem

The 2013 *Australian Education Act, 78(5)* requires Approved Authorities (Government and Catholic education systems and Independent schools) to distribute recurrent Commonwealth funding to schools according to a needs-based model consisting of a per student base amount and six additional 'equity' loadings, one of which is the low English language proficiency loading for students with limited English.[150] The Act requires these Approved Authorities to make these distributions publicly available and transparent.[151] After nearly a decade, this legislative requirement has still not been met. There is no national or consistent public reporting of Commonwealth ELP funding allocations to systems or of Approved Authorities' various needs-based funding models, their ELP funding distributions to schools, or of schools' use of these funds to support EAL/D learners.[152] Media and Commonwealth and state Auditor-General's reports have drawn attention to the lack of transparency and accountability in Gonski needs-based funding for schools, including the low English proficiency loading, and the impossibility of ascertaining its outcomes.[153] A national EAL/D survey conducted by ACTA in 2016 found that dedicated EAL/D provision in schools was being substantially eroded due to school autonomy and flexible resource management policies using one-line/global budget allocations which resulted in a total loss of transparency in use of funding for EAL/D learners.[154] Widespread anecdotal reports indicate that the situation has subsequently worsened.

Solution

The Australian Government should conduct an independent review of systems' and schools' allocation, distribution and use of the low ELP loading to determine how these funds are directed at system and school levels to supporting the EAL/D learner target group, and the impact of this provision on their English language proficiency. The review should determine transparent reporting mechanisms, including the use of system and school EAL/D service plans,[155] and specify desired program outcomes, including progress in English, as part of new bilateral agreements for Commonwealth schools funding. Jurisdictions should be required to report on any use of the ELP loading that not directly allocated to schools.

Benefits

Along with Action 10, this Action would reverse the currently indefensible situation where no national data exists on students' English proficiency levels or provision to meet their English language learning needs.[156] Robust reporting on use of the low English language proficiency loading will meet legislative requirements for accountability and transparency currently being disregarded. The use of Commonwealth funding to support EAL/D learners would be transparent[157] and provide an essential evidence base for Commonwealth and state level quality assurance and program planning.

Policy context

This Action accords with the 2013 *Australian Education Act, 78(5)* and Regulations, NSRB Review of needs-based funding requirements Final Report,[158] and the report of the 2022 Parliamentary Inquiry into the Importance of Adult Literacy Recommendations 7 and 8.[159]

Implementation

DESE in collaboration with state and territory education systems and EAL/D stakeholders.[160]

2022	*2023*	*2024*
Undertake review of reporting mechanisms for the allocation, distribution and use of Commonwealth ELP loading funding and its outcomes.	Review report recommendations, including on EAL/D service planning. Incorporate accountability reporting requirements in national data sharing agreements.	National accountability reporting system for ELP loading funding implemented under new NSFA.

Enhancing the national evidence base

ACTION 12: Review reporting, accountability and implementation of international student programs in Australian schools

Problem

Prior to the COVID pandemic, international fee-paying programs in Government, Catholic and Independent schools in Australia had become big business[161] with enrolments having grown over the last three decades to a total of 243,887 students by 2018.[162] Although international students must meet minimum English language proficiency requirements as a condition of school enrolment, a number are found on arrival to have insufficient English for learning in Australian schools and therefore require EAL/D support.[163] The *Education Services for Overseas Students (ESOS) Act 200*2 and related legislation aim to protect and enhance Australia's reputation for quality education Australia by providing rigorous protection, including tuition protection, for international students.[164] However, there is currently no meaningful public reporting of the quality of international student programs, their compliance with the standards of the *National Code of Practice*,[165] or students' access to school services, including EAL/D tuition.[166] Internally reported student enrolment data provided by systems to DESE is incomplete and inconsistent with enrolment data published on program websites.[167] The last review into education provision for students on international student visas was in 2009.[168] As state and territory systems and government and independent schools revive their international student programs, this lack of transparency – coupled with even less clarity regarding the use of the English Proficiency Loading (see Action 11) – risks reputational damage to both full fee-paying international student programs and equity focussed EAL/D programs. International students, along with all other Australian school students, have a right to expect quality education that meets their learning needs. Transparency at a school, system and national level is needed to assure students and their families that the high fees they pay are directed to ensuring their quality education. The current lack of transparency has encouraged the corrosive perception, in at least some jurisdictions, that international students are accessing targeted EAL/D provision at the expense of domestic EAL/D learners.[169]

Solution

An external independent national review of international student programs in Australian schools should be conducted to determine; (i) state and territory systems' compliance with the requirements for overseas students in the *Australian Education Act* and the *Education Services for Overseas Students Act 2000* (ESOS),[170] (ii) transparency and accountability of reporting at school, system and national levels on school international student programs, (iii) adequacy of English language assessments, provision and services for international students, (iv) the relationship at school and system levels between provision for international students and Australian citizens and permanent residents with EAL/D learning needs.

Benefits

This Solution would ensure transparent, national reporting and accountability for international student programs in schools that provides the necessary assurances to international students and the Australian public, and a sound evidence base for Commonwealth and state/territory quality assurance.

Policy context

This Action accords with the Australian Education Act and the Education Services for Overseas Students Act 2000 (ESOS) and the National Code of Practice for Providers of Education and Training to Overseas Students.[171]

Implementation

ANAO with the cooperation of DESE and state and territory education systems.

2022	2023	2024
National review of school international student programs.	Implement report recommendations. Incorporate accountability reporting requirements in national data sharing agreements.	National reporting system for international student programs implemented under new NSFA

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[9] In 2008, the Rudd Labor Government rolled the ESL New Arrivals funding into broader funding categories for government schools while ESL New Arrivals per capita funding was legislated and retained for non-government schools. In 2013, the Abbot Coalition government incorporated all ESL New Arrivals funding into the new School Resourcing Standard.

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[31] The loadings are for students with disability, low English proficiency, Aboriginal and Torres Strait Islanders, socio-educational disadvantage, (remote) school location, and school size.

[32] The formula (outlined in the Australian Education Act 201, section 39) provides 10% extra funding for students identified as having 'low English proficiency.' (Answers to Senate Estimates Questions on notice SQ18-649, 658, 665, SQ19-120). This loading accounts for a small percentage (0.2 per cent in 2019) of total school funding in the Government sector. (Answer to Senate Estimates Question on notice SQ19-132)

[33] For example, no provision was made within the special $827 million resettlement allocation over the four year funding period for the additional English language tuition of school-aged children in the 12,000 Syrian and Iraqi refugee intake announced in 2015. Answer to Senate Estimates Questions on Notice SQ18-666. School-aged children comprised 27 per cent of the total intake. (SQ19-133).

[34] The Commonwealth justifies the token amount of the English proficiency loading on the basis of jurisdictions' ability to flexibly pool and supplement Commonwealth and state and territory funding and expects state and territory governments to absorb the additional English language tuition costs of any special humanitarian intakes within their existing funding. The Commonwealth expects schools and school systems to consider their funding from all sources (i.e. Australian Government, state and territory and private) and prioritise their spending to meet the educational needs of all their students, including for students with low English language proficiency. (Answer to Senate Estimates Questions on Notice SQ19-133) "As with all Commonwealth recurrent funding for schools, the total funding (base and loadings) are [sic] provided as a lump sum to school authorities, which can then distribute the funding to schools according to their own needs based arrangements. Schools and school systems are expected to pool their funding from all sources (i.e. Australian Government, state and territory and private) and prioritise spending to meet the educational needs of all their students, recognising that schools and school systems are best placed to understand the individual needs of their students."

[35] In 2021, the average per student loading amount was $262 for Government schools, $919 for Catholic schools, and $1045 for Independent schools (analysis of data provided in answer to Senate Estimates Question on Notice SQ21-1004). Systematic variations in Government, Catholic and Independent school sector allocations show that low proficiency loading allocations to authorities are not 'sector blind'. Government schools currently receive 45% of all low proficiency loading funds compared with 28% for Catholic schools and 27% for independent schools. As government school systems enrol the great majority of students with low English proficiency, this sector-differentiated loading especially disadvantages public education. This differential treatment of school sectors represents a major departure from the common universal ESL New Arrivals per capita grant for both government and non-government schools under the former Commonwealth Programs for Schools Quadrennial Administrative Guidelines 2005-2008.

[36] The last (and only) public review of funding for students with English language proficiency needs was the 2006 *MCEETYA Schools Resourcing Taskforce review of former English Second Language (ESL) New Arrivals funding.* The Taskforce Report found that estimated actual per capita costs for delivery of ESL New arrivals services to a newly arrived student in 2005 was $6,160 for a non-refugee student and $10,349 for a refugee and humanitarian student. When costs of improved service provision needed to enable student to achieve reach a satisfactory standard of English were factored in, an amount of $7,745 and $18,730 respectively was required. The report recommended increasing the ESL New Arrivals per capita grant, including establishing a differential higher level of funding for refugee and humanitarian entrants with disrupted or no previous education. See report at:https://files.eric.ed.gov/fulltext/ED534658.pdf

[37] English and Indigenous language learning issues were ignored in the Independent Review into Regional, Rural and Remote Education at: https://www.dese.gov.au/quality-schools-package/resources/independent-review-regional-rural-and-remote-education-final-report

[38] Answer to Senate Estimates question on notice, SQ19-128.

[39]Statistics Unit, Centre for Educational Statistics and Evaluation, NSW DEC (2013) *Improvements and Alternatives to the Disadvantaged LBOTE Measure Report* at: http://wwwcesenswgovau/images/stories/PDF/Improvements_and_alternatives_to_the_Disadvantaged_LBOTE_measure_pdf The analysis concluded that the "disadvantaged LBOTE" measure not only significantly underestimates the size of the cohort needing EAL/D support but it also does not capture the right students, and therefore should not be used to identify the ELP loading for EAL/D students. It estimated that using "disadvantaged LBOTE" as a proxy for English language proficiency suggests that 74.7 per cent of the $100 million earmarked by Gonski-funding for limited English language proficiency would be misdirected to students who do not require EAL/D support.

[40] Answers to Senate Estimate Questions on Notice SQ 18-640,641,644,668

[41] The ACARA EAL/D learning progression was developed in 2012 to support teachers in understanding the broad phases of English language learning – Beginning, Emerging, Developing and Consolidating – to monitor EAL/D students' English development in listening, speaking, reading and writing and inform teaching and learning. As a nationally recognised curriculum resource, the EAL/D Learning Progression has the potential to be implemented nationally as a common measure of English language proficiency.

[42] EAL/D learner need can be reliably identified according to a combination of key EAL/D need indicators such as LBOTE or ATSI background, identified English proficiency phase level; scholastic year, risk of not progressing to Consolidating phase, moderated length of time in Australian school, with an additional refugee weighting. The NSW EAL/D allocation model based on the ACARA *EAL/D Learning Progression* provides a reliable, validated method to developing such a National Index. See: https://education.nsw.gov.au/about-us/educational-data/cese/publications/research-reports/revised-methodology-for-the-elp-funding-model

[43] https://www.dese.gov.au/national-school-resourcing-board

[44] See Poetsch, S. (2020). Unrecognised language teaching: Teaching Australian Curriculum content in remote Aboriginal community schools. TESOL in Context, 29(1), 37-58.

[45] Disability education's focus on adjustments and accommodations for individual student learning needs does not reflect the linguistic scope and focus of EAL/D pedagogy for EAL/D learners.

[46] Hallmarks of EAL/D pedagogy are the identification and creation of curriculum language learning opportunities through modelling, scaffolding and practice within the whole-class, group and individual work participation/discourse structures of the classroom. e.g. Turner, M. (2019). Knowledge about (English) language across the curriculum in EAL and CLIL contexts. In The Routledge Handbook of Language Education Curriculum Design (pp. 90-106). Routledge; Liu, Y., Fisher, L., Forbes, K., & Evans, M. (2017). The knowledge base of teaching in linguistically diverse contexts: 10 grounded principles of multilingual classroom pedagogy for EAL. Language and Intercultural Communication, 17(4), 378-395.

[47] Indigenous students are referenced only by ethnicity, as distinct from EAL/D learning needs.

[48] Bailey, A. L., & Heritage, M. (2014). The role of language learning progressions in improved instruction and assessment of English language learners. TESOL Quarterly, 48(3), 480-506.

[49] https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement ps.20,21

[50] https://www.acara.edu.au/docs/default-source/media-releases/endorsement-ac-media-release-2022.pdf

[51] ACTA Report: *How many English as an Additional Language or Dialect (EAL/D) Learners are there in Australian Schools?* | Australian Council of TESOL Associations. In 2011, 6,777 or 11.6 % of Aboriginal and Torres Strait Islander people aged between 0-25 years living in remote or very remote areas spoke an Australian Indigenous language at home and did not speak English or speak it with any degree of proficiency. Indigenous students living in remote areas have little or no exposure to Standard Australian English and experience a variety of Aboriginal language home environments and levels of proficiency in Standard Australian English. Some children speak an Indigenous traditional and modern (e.g. Creole) Australian language as their home language. In some communities these are the languages of school instruction and of initial literacy learning in the early years with programs in the home language and English. Given the language background of some students, it is these modern Indigenous languages - contact languages such as creoles and mixed languages - that are the medium of instruction for language and literacy learning in early childhood settings. In other contexts, where Aboriginal varieties are more commonly spoken, there is a range of Aboriginal Englishes, plus Torres Strait Islander English, used. These generally indicate dialects of English, which to varying degrees are comparatively comprehensible to Standard Australian English.

[52] Research highlights the cultural and cognitive benefits of first language instruction for Indigenous languages speaking students and the benefits of bilingual instruction for developing English literacy skills. This strength-based approach builds on and develops the language(s), knowledge and skills that children bring to school, promotes self-worth, wellbeing, confidence and cultural connectedness that fosters academic engagement, participation and achievement in school, as well as future employment. Guenther, J. et al.(2014) *Red Dirt Thinking on Remote Educational Advantage* at: https://search.informit.com.au/documentSummary;dn=197109386575105;res=IELHSS; Collier, V. & Thomas , W. (2017) Validating the power of bilingual schooling: Thirty two years of large scale longitudinal research. *Annual Review of Applied Linguistics*: 37, p. 203-217; Poetsch, S. (2020). Unrecognised language teaching: Teaching Australian Curriculum content in remote Aboriginal community schools. *TESOL in Context*, 29(1), 37-58; Wigglesworth, G. (2020). Remote Indigenous education and translanguaging. *TESOL in Context*, 29(1), 95-113. Language-based, best practices in Indigenous education have been well documented but either abandoned or ignored. These include EAL/D assessment and pedagogy, bilingual/biliterate, two-way language learning, and culturally appropriate curriculum and resources. The effectiveness of the "two way stair case" bilingual program model for Indigenous students' learning were well documented before being disbanded. See : ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf (atesolnt.org.au)

[53] Namely: Aboriginal and Torres Strait Islander Education Action Plan 2010–2014 at: http://scseec.edu.au/site/DefaultSite/filesystem/documents/ATSI%20documents/ATSIEAP_web_version_final.pdf; National Aboriginal and ACTA/ALAA/ALS joint submission to the consultation on the Plan at: http://www.tesol.org.au/files/files/141_IEAP_Submission_final.pdf and Torres Strait Islander Education Strategy 2015 at: http://www.scseec.edu.au/site/DefaultSite/filesystem/documents/ATSI%20documents/DECD__NATSI_EducationStrategy.pdf; Evaluation of the Aboriginal and Torres Strait Islander Education Action Plan 2010-2014 Final Evaluation Report at: http://www.educationcouncil.edu.au/site/DefaultSite/filesystem/documents/ATSI%20documents/ATSI%202010-2014%20Final%20Evaluation%20Report/1Final_Evaluation_ATSIEAP_ACILAllenConsulting.pdf; See also ACTA submission to the Inquiry at: http://www.tesol.org.au/files/files/169_govt_inquiry_ATSI_langs.pdf; Indigenous language learning issues were ignored in the *Independent Review into Regional, Rural and Remote Education* largely absent from the Productivity Commission's *Overcoming Indigenous Disadvantage Key Indicators 2020 Report* and entirely absent from its *Indigenous Evaluation Strategy*. See ACTA submission to Productivity Commission's *Indigenous Evaluation Strategy* at: https://tesol.org.au/wp content/uploads/2019/10/628_Indigenous_Evaluation_Submission_from_the_Australian_Council_of_TESOL_Associations_final_v.2.pdf

[54] Nicholls, C. (2005). Death by a thousand cuts: Indigenous language bilingual education programmes in the Northern Territory of Australia, 1972–1998. *International Journal of Bilingual Education and Bilingualism*, 8(2-3), 160-177.

[55] NAPLAN testing is an inappropriate and invalid measure for Indigenous EAL/D students learning Standard Australian English as their additional language. It does not assess Indigenous students' oral English language proficiency that underpins English reading and writing skills. It assesses students' literacy in a language they can't speak about culturally alien content that reflects an urban, English-speaking life-world. In the Northern Territory, one in three Indigenous students (one in two for year 9 tests) do not sit NAPLAN tests further undermining its validity. See: Don't take it as read report p.90 at:https://www.aph.gov.au/Parliamentary_Business/Committees/House/Employment_Education_and_Training/Adultliteracy/Report; *ACTA submission to the Inquiry into adult literacy and its importance*, p.34 at: https://tesol.org.au/acta-submission-to-the-parliamentary-inquiry-into-the-importance-of-adult-literacy/ Although a suitable alternative assessment measure is available which recognises Indigenous students' spoken dialects as they acquire the Standard Australian English necessary for language and literacy and learning in the Australian Curriculum - the ACARA EAL/D Learning Progression - its use is not supported by the Northern Territory education system.

[56] Northern Territory 2014 Wilson review at: https://www.nt.gov.au/__data/assets/pdf_file/0020/229016/A-Share-in-the-Future-The-Review-of-Indigenous-Education-in-the-Northern-Territory.pdf;

[57] ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf (atesolnt.org.au)

[58] In very remote Northern Territory remote schools, four-day attendance of Indigenous students fell from 19 per cent in 2016 to 14 per cent in 2020 as a direct result of a discriminatory policy of tying school funding to student attendance. This policy caused an approximately 50 per cent cut in school budgets, subsequent cuts to Aboriginal and assistant teachers, increased class sizes and teacher casualisation, which, in turn, led to reduced student attendance and disengagement. In 2019, fewer than four per cent of Year 9 remote Indigenous students met minimum writing levels on NAPLAN. ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf (atesolnt.org.au)

[59] Indigenous Girls' Academies, secondary school scholarships, boarding school placements and Away from base activities take selected individuals away from their schools and communities leaving local educational disadvantage unaddressed. Many remote Indigenous students who go to boarding school drop-out and return to communities where there is either no or extremely limited provision of any form of secondary schooling. Statistics to support the above are on page 6 of the 2020 study, *Boarding off Country*. See:https://caepr.cass.anu.edu.au/sites/default/files/docs/2020/9/NT_Ed_Study_2020_7_Sept_1.pdf. The Commonwealth's Remote Schools Attendance Strategy implemented since 2014 has had mixed results. See: Products – The Centre for Independent Studies (cis.org.au)

[60] *Mind the Gap: Understanding the Indigenous education gap and how to close it* (2021),G. Fahey, Centre for Independent Studies, at: rr41.pdf (cis.org.au)

[61] 2018 NTG submission, p. 2 "The department provides education services to more than 34 000 children … Two in five students in the NT are Aboriginal, and one in four are very remote Aboriginal students"; Fahey, G., (2021) *Mind the Gap: Understanding the Indigenous education gap and how to close it* Centre for Independent Studies, at: rr41.pdf (cis.org.au); Closing the Gap | Closing The Gap (niaa.gov.au). See also ATESOL NT, 2021, Supplementary Submission to the Parliamentary Inquiry into Adult Literacy and its Importance at: https://atesolnt.org.au/wp-content/uploads/ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf

[62] The Co-ordinator-General would report to the federal Education Minister on the effective resourcing, implementation, evaluation and development of the strategy.

[63] The characteristics of effective remote schools that achieve good learning outcomes for Indigenous students have been well documented but not systemically applied, e.g. 2012 House of Representatives inquiry into language learning in Indigenous communities, *Our Land Our Language* at: file:///D:/Users/z3281608/Downloads/http www.aphref.aph.gov.au_house_committee__atsia_languages2_report_full%20report%20(1).pdf The inquiry recommended incorporating Indigenous languages in the closing the gap framework, resourcing bilingual programs for indigenous communities, instituting compulsory EAL/D training for all teachers working in Indigenous community schools and more appropriate EAL/D assessment of Indigenous students' language and literacy proficiency needs. National Curriculum Services (2012) *Success in remote schools* at: http://www.whatworks.edu.au/upload/1341805220784_file_SuccessinRemoteSchools2012.pdf;
Van Gelderen, B. (2017). 'Growing our own': A 'two way', place-based approach to Indigenous initial teacher education in remote Northern Territory. *Australian and International Journal of Rural Education*, *27*(1), 14-28.; The Literacy for Life Foundation's Indigenous community-led literacy campaign model, with literacy instruction delivered by trained community members, has a proven track record of transformational literacy learning outcomes for Indigenous adults, families and communities. Literacy For Life Foundation - Aboriginal-led adult literacy charity (lflf.org.au)

[64] The Strategy's bilingual/biliteracy approach focuses on Indigenous languages, Creoles and EAL/D as both object and medium of instruction. The role, value and identification of (non-standard) varieties of Aboriginal English dialects and associated bi-dialectal instructional approaches is less clear. For example, not all Indigenous students speaking an Aboriginal dialect require EAL/D support (Angelo, D., & Hudson, C.,2020, From the periphery to the centre: Securing the place at the heart of the TESOL field for First Nations learners of English as an Additional Language/Dialect. TESOL in Context, 29(1), 5-35; Malcolm, I. G., Konigsberg, P., & Collard, G. 2020,. Aboriginal English and responsive pedagogy in Australian education. TESOL in Context, 29(1), 61-93). For this reason, a language-in-education research component to the Strategy is essential.

[65] The new ten year National Closing the Gap Agreement, while emphasising greater partnership with Indigenous Peak Bodies, has dropped all outcome targets relating to student participation during the school years. This represents a substantial weakening of national commitment to improving Indigenous students' learning in school. There are currently no specific budget measures related to Indigenous education for the new Closing the Gap framework. See: Indigenous affairs: education, employment and community safety – Parliament of Australia (aph.gov.au). Those targets which have been retained – Indigenous participation in Early Childhood Education and Year 12 attainment – are on track but have been found to offer no necessary academic benefit. Attendance in unstructured pre-school and childcare programs do not necessarily result in language and learning outcomes that carry over into school learning. Conversely, Year 12 completion may be merely perfunctory and not result in the reading and writing skills needed for employment or further study. Fahey, G., (2021) Mind the Gap: Understanding the Indigenous education gap and how to close it Centre for Independent Studies, at: rr41.pdf (cis.org.au); Closing the Gap | Closing The Gap (niaa.gov.au)

[66] A key objective is "increasing relevant qualifications and skills of the Aboriginal and Torres Strait Islander workforce, alongside professional recognition of cultural knowledge, skills and relationships that are essential to effective service delivery" p 19. All the jurisdictions are supposed to be doing this under Closing the Gap agreements. Sector Strengthening Plan: Early Childhood Care and Development (closingthegap.gov.au)

[67] Appointment of a Co-ordinator-General and establishment of community, steering and advisory and groups with appropriate expertise would be essential to the success of the strategy.

[68] In remote communities, there is little or no provision for Indigenous students to complete secondary education. In the Northern Territory, Queensland and Western Australia, the main or only option is boarding school. While some students have successful boarding school experiences, reports are emerging of the difficulties faced by those alienated by schools disconnected from communities. COVID-19 also saw boarding school students returned home, where access to on-line tuition was difficult if not impossible. Lack of educational and employment opportunities when students return to their communities appears to be contributing to youth suicide rates.

[69] Young people with low English oracy and literacy are also unable to access accredited VET programs offered in remote Indigenous secondary programs. These programs are not designed to meet students' pre-vocational English learning needs and are often irrelevant to the employment opportunities in local communities. See: ATESOL NT, 2021, Supplementary Submission to the Parliamentary Inquiry into Adult Literacy and its Importance. At: https://atesolnt.org.au/wp-content/uploads/ATESOL-NT-Supplementary-Submission-to-the-Inquiry-into-Adult-Literacy-and-its-Importance.pdf; See also: Beetson, J.(2022) Literacy for Life Foundation, Submission to House of Representatives Standing Committee on Employment Education and Training inquiry into Adult literacy and its importance, submission 75, accessed at: Submissions – Parliament of Australia (aph.gov.au)

[70] In 2016/17, some 5,041 or 89% of all humanitarian youth aged 12-24 years arrived in Australia with 'nil' or 'poor' English language proficiency http://www.myan.org.au/file/file/MYAN%20Youth%20Settlement%20Trends_2016-2017%20Final(2).pdf; Educational provision for school-aged youth in urban centres includes access to on-arrival secondary Intensive English Centre (IEC) support for 6 to 18 months followed by transition to high school. 16-24 year olds can also access the Adult Migrant English Program (AMEP), which, in theory has the flexibility to offer tailor-made programs that include access to (and combination with) training pathways. In practice, these youth are mostly placed in inappropriate classes with older learners, including their parents. Other options are community education (ACE) and other community providers, in which tailor-made programs are rare if non-existent. These programs are also often unstable because they are funded through short-term contracts. See: Manspile, E., Atwell, M. N., & Bridgeland, J. M. (2021). Immigrant Students and English Learners: Challenges Faced in High School and Postsecondary Education. Civic; Leaton Gray, S., Saville, K., Hargreaves, E., Jones, E., & Perryman, J. (2021). Moving up: Secondary school transition processes during the COVID-19 pandemic for schools.

[71]Systemic responses to the education, training and employment needs of vulnerable migrant, refugee and Indigenous young people are missing among the fragmented range of different adult education and employment programs. With reduced funding, TAFE VET courses are struggling to meet the LLND skill gaps of large numbers of students from non-English speaking backgrounds who are operating below level 1 on the ACSF. Newly arrived migrants and refugees are not identified as a priority group within the Skills for Education and Employment (SEE) Program. Short-term pilot projects such as the Commonwealth's Youth Transition Support pilot programs have provided only temporary, non-scalable, piecemeal, solutions. The recently released ten year *National Foundation Skills Framework* makes no mention of this vulnerable target group. (https://www.skillsreform.gov.au/images/documents/National-Foundation-Skills-Framework-2022-to-2032.pd)

[72] COVID-19 has impacted young people in educational, economic, social, civic and personal domains. Centre for Multicultural Youth, (2020) *Locked down and locked out: The impact of COVID-19 on employment for young people from refugee and migrant backgrounds in Victoria* at:https://www.cmy.net.au/wp-content/uploads/2020/06/Locked-Down-and-Locked-Out-Report-June-2020-final.pdf ;
Doery, K., Guerra, C., Kenny, E., Harriott, L., & Priest, N. (2020). *Hidden cost: Young multicultural Victorians and COVID-19*. Summary report. Melbourne: Centre for Multicultural Youth, accessed at: https://www.cmy.net.au/resource/hidden-cost/; (MYAN National Youth Settlement Framework https://myan.org.au/wp-content/uploads/2020/06/myan0004-revised-nysf_fa_low-res.pdf)
The problems are exacerbated for Indigenous, migrant and refugee youth. Lockdowns have disrupted on-arrival Intensive English provision and study assistance. High schools are typically ill-equipped to cater for the high support needs of this group. This situation exacerbated by deteriorating IEC and school EAL programs. (ACTA submission into Migrant Settlement Outcomes. p.97, 57-73), weakened engagement and learning in the final years of school; restricted access and participation in further education and training; reduced opportunities for work experience, mentoring and volunteering; increased employment and financial insecurity; weakened social connections and increased social isolation, psychological stress and mental ill health. See Centre for Multicultural Youth, 2021, Settlement Interrupted at: https://www.cmy.net.au/resource/settlement-interrupted-report-2021/?mc_cid=95305d08cf&mc_eid=UNIQID.

[73] Youth advocates have a called for a 'new deal' youth guarantee with comprehensive measures to address fundamental youth disadvantage, such as publicly funded post-secondary education and training, living wage study and training allowance, entry-level employment and related employment services that address the long-term structural employment inequity and economic insecurity experienced by young people coming of age during the pandemic. National Youth Commission Australia, 2020, 'Youth Futures Guarantee: A new deal for young people' at:https://nycinquiry.org.au/wp-content/uploads/2020/08/NYCA-Youth-Futures-Guarantee-2020-1.pdf ; Jackson, S. 2020, 'Coming of age in a crisis: Young workers, COVID-19 and the Youth Guarantee' at: https://percapita.org.au/wp-content/uploads/2020/06/Coming-of-Age-in-a-Crisis_FINAL.pdf; Arakkal, S. 2020, 'Why Australia needs a Youth Guarantee', at: https://www.ceda.com.au/getmedia/60c5f871-075a-4034-acb5-3ee770a81277/CCEP-Labour-2020-youth-jobs-Sonia-Arakkal.pdf; Littleton, E. & Campbell, R. (2022) Youth unemployment and the pandemic. The Australia Institute at: https://australiainstitute.org.au/wp-content/uploads/2022/04/P1143-Youth-unemployment-and-pandemic-Australia-Web.pdf

[74] Previous Commonwealth-funded Youth Transition Support pilot programs have shown effective early intervention across school, work and community settings assisting young people along education and employment pathways (Synergistiq (2018) Youth Transition Support Pilot Period Evaluation Report at https://drive.google.com/file/d/116WX2-gxBR7uszZkDF9KfFbYJupRLS07/view). Similarly, some initiatives developed in Melbourne and Brisbane within the Special Preparatory Program of the Adult Migrant English Program (AMEP) also demonstrated considerable success in placing 16–24 year old youth on training, education and employment pathways. Multicultural Youth Advocacy Network's (MYAN) 'four pillars' of: partnership for employment; strong connections with education; increased vocational opportunities; and sports engagement for youth, provides a useful framework for these pathway transition support programs.ps://myan.org.au/resources/national-youth-settlement-framework/

[75] ACTA identified best practice standards for effective English language provision for refugee youth. See ACTA submission to the 2017 *Inquiry into Migrant Settlement Outcomes,* p.135-146. See also MYAN National Youth Settlement Framework at: http://www.myan.org.au/file/file/Youth%20Settlement%20Framework%2031%20March%202016(1).pdf Examples of best practice are the St Joseph's Maree Program at: https://www.sjflcmaree.com/, the Melbourne-based AMES refugee youth program, Bright Futures (defunded in 2017), and the TAFE Young Adult Migrant English course (YAMEC). Outstanding programs for refugee youth have fallen victim to short-term contracting or been discontinued supposedly because of lack of demand but actually due to ineffective outreach to ethnic communities.

[76] https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement p.22

[77] In August 2020, Heads of Government signed on to a new National Skills Reform Agreement. It includes stronger support for foundation skills and ensuring access for all Australians with low levels of English, literacy, numeracy and digital literacy. https://www.pmc.gov.au/resource-centre/domestic-policy/heads-agreement-skills-reform Agreement is yet to be reached on joint funding arrangements. https://www.afr.com/work-and-careers/education/no-agreement-on-national-skills-funding-deal-20211004-p58x3o

[78] The 2020 Education Council report, *Looking to the Future: Report of the Review of Senior Secondary Pathways into Work, Further Education and Training* (Looking to the Future: Report of the Review of senior secondary pathways into work, further education and training - Department of Education, Skills and Employment, Australian Government (dese.gov.au), recommended that all students be supported to meet essential post-school foundation minimum proficiency standards in literacy, numeracy and digital literacy by the end of Year 10, and that additional targeted provision be made where those standards are unmet. The report also recommended a national Transition from School Program with collaborative demonstration projects to trial and evaluate approaches to supporting vulnerable and at-risk school leavers, including students from refugee and migrant backgrounds. In June 2020, the then Education Council accepted this report and agreed to progress recommendations that could be actioned immediately to address current gaps. (Education Council Meeting Communique, 11 December, 2020 at: https://www.dese.gov.au/education-ministers-meeting/resources/education-council-communique-11-december-2020).

[79] House of Representatives Standing Committee on Employment, Education and Training, 2022, *Don't take it as read: inquiry into adult literacy and its importance,* ps. 150 - 155 at:
https://parlinfo.aph.gov.au/parlInfo/download/committees/reportrep/024806/toc_pdf/Don'ttakeitasread.pdf;fileType%3Dapplication%2Fpdf

[80] ACTA submission to the QITE Review p.3.

[81] Villegas, A. M., Saizde LaMora, K., Martin, A. D., & Mills, T. (2018, April). Preparing future mainstream teachers to teach English language learners: A review of the empirical literature. In *The Educational Forum* (Vol. 82, No. 2, pp. 138-155). Routledge.

[82] ACTA submission to the QITE Review. p.7,8,14 and Appendix B. These courses are typically devoid of TESOL content, merely recommending more time and simplified content for EAL/D learners. These approaches reinforce the mistaken view that these learners suffer from disabilities and/or social disadvantage. Literacy units offered in ITE programs generally conflate literacy learning with English learning.

[83] Australian Government, 2022, *Next Steps Report of the Quality Initial Education Review*, ps.43-44, 48.

[84] Cox, R. (2019). The role of spoken interaction. In The alphabetic principle and beyond: Surveying the landscape. *Primary English Teaching Association Australia (PETAA)*.
NICHD Early Child Care Research Network. (2005). Pathways to reading: The role of oral language in the transition to reading. *Developmental psychology*, 41(2), 428-442.
Angelo, D. (2013). Identification and assessment contexts of Aboriginal and Torres Strait Islander learners of Standard Australian English: Challenges for the language testing community. Papers in Language Testing and Assessment, 2(2), 67-102.

Guzman-Orth, D. A., Lopez, A. A., & Tolentino, F. (2019). Exploring the use of a dual language assessment task to assess young English learners. Language Assessment Quarterly, 16(4-5), 447-463.

Ortiz, A. A., Robertson, P. M., & Wilkinson, C. Y. (2018). Language and literacy assessment record for English Learners in bilingual education: A framework for instructional planning and decision-making. Preventing School Failure: Alternative Education for Children and Youth, 62(4), 250-265.

Papp, S. (2018). Assessment of young English language learners. The Routledge handbook of teaching English to young learners, 389-408.

[85] Hammer, C. S., Hoff, E., Uchikoshi, Y., Gillanders, C., Castro, D. C., & Sandilos, L. E. (2014). The language and literacy development of young dual language learners: A critical review. *Early childhood research quarterly*, 29(4), 715-733;

Jongejan, W., Verhoeven, L., & Siegel, L. S. (2007). Predictors of reading and spelling abilities in first-and second-language learners. *Journal of educational psychology*, 99(4), 835;

Papastefanou, T., Marinis, T., & Powell, D. (2021). Development of reading comprehension in bilingual and monolingual children—effects of language exposure. *Languages*, 6(4), 166.

Verhoeven, L., & Van Leeuwe, J. (2012). The simple view of second language reading throughout the primary grades. Reading and writing, 25(8), 1805-1818. The linguistic and cultural contexts of remote EAL/D Indigenous learners are routinely ignored.

Ebe, A. E. (2010). Culturally relevant texts and reading assessment for English language learners. Reading Horizons: A Journal of Literacy and Language Arts, 50(3), 5.

[86] Lesaux, N. K., & Siegel, L. S. (2003). The development of reading in children who speak English as a second language. *Developmental psychology*, 39(6), 1005; Lipka, O., & Siegel, L. S. (2012). The development of reading comprehension skills in children learning English as a second language. *Reading and Writing,* 25(8), 1873-1898.

[87] Edwards-Groves, C., & Freebody, P. (2021). Literacy's changing morphologies: Trajectories, classroom exchanges and the evolution of literacy demands over the school years. *Australian Journal of Language and Literacy*, 44(2), 76-89; Matruglio, E., & Jones, P. (2021). Literacy transitions: Stories of surges, struggles and shape-shifting. *Australian Journal of Language and Literacy*, 44(2), 4-10; Weekes, T., & Jones, P. (2021). The challenges of mapping literacy development across the years of schooling. *Australian Journal of Language and Literacy*, 44(2), 11-25.

[88] De Valenzuela, J. S., Copeland, S. R., Qi, C. H., & Park, M. (2006). Examining educational equity: Revisiting the disproportionate representation of minority students in special education. *Exceptional children*, 72(4), 425-441.

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Finelli-Thomsen, A. J. (2012). Bilingual reading assessment: identification of English language learners at risk for reading disorders.

Pieretti, R. A., & Roseberry-McKibbin, C. (2016). Assessment and intervention for English language learners with primary language impairment: Research-based best practices. Communication Disorders Quarterly, 37(2), 117-128.

Torres Ovando, E. M., Maddocks, D. L., & Valenzuela, A. (2019). Assessment and English Language Learners in Special Education. In Dual Language Education: Teaching and Leading in Two Languages (pp. 57-76). Springer, Cham.

[89] See ACTA submission to the QITE Review p.7, 9. Liu, Y., Fisher, L., Forbes, K., & Evans, M. (2017). The knowledge base of teaching in linguistically diverse contexts: 10 grounded principles of multilingual classroom pedagogy for EAL. *Language and Intercultural Communication*, 17(4), 378-395Turner, M. (2019). Knowledge about (English) language across the curriculum in EAL and CLIL contexts. In *The Routledge Handbook of Language Education Curriculum Design* (pp. 90-106). Routledge.

[90] e.g. Fairbairn, S. & Jones-Vo, S. (2010). Differentiating Instruction and Assessment for English Language Learners: A Guide for K-12 Teachers. Philadelphia: Calson.

Szecsi, T., & Szilagyi, J. (2021). Language Assessment Literacy: Analyzing the Perspectives of Mainstream Teachers Toward English Learners. *Journal of English Learner Education*, *12*(1), 3.

[91] E.g. Baecher, L., Knoll, M., & Patti, J. (2016). Targeted observation of ELL instruction as a tool in the preparation of school leaders. *International Multilingual Research Journal*, *10*(3), 201-216. Quality teaching rounds, p.40, Australian Government, 2022, *Next Steps: Report of the Quality Initial Teacher Education Review*.

See also: Hammond, J. (2008). Intellectual challenge and ESL students: Implications of quality teaching initiatives. *Australian Journal of Language and Literacy, The*, *31*(2), 128-154.

[92] Australian Government, 2022, *Next Steps Report of the Quality Initial Education Review,* ps.63-66.

[93] Ibid*,* ps.69-72.

[94] https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement p.23

[95] https://www.dese.gov.au/quality-initial-teacher-education-review/resources/next-steps-report-quality-initial-teacher-education-review

[96] Since the 1980s, it has been recognised that *basic* TESOL training for specialist teachers in schools requires 120 hours of post-degree TESOL study in these areas, plus at least 60 hours of supervised EAL/D teaching practice. Schools require qualified TESOL teachers to provide specialised teaching and assessment of EAL/D learners, and to support and advise their colleagues and schools. Cf. Faltis, C., Arias, M. B., & Ramírez-Marín, F. (2010). Identifying relevant competencies for secondary teachers of English learners. *Bilingual Research Journal*, *33*(3), 307-328.

[97] AITL's *Australian Professional Standards for Teachers* are generic teaching standards which do not specify EAL/D teaching knowledge and skills.

[98] AITSL answer to Senate Estimates Questions on Notice SQ19-126. Document can be accessed at:https://www.aitsl.edu.au/docs/default-source/national-policy-framework/accreditation-of-initial-teacher-education-programs-in-australia.pdf?sfvrsn=e87cff3c_48

[99] Recognition of TESOL qualifications and standards by state/territory teacher accreditation bodies has lapsed from what was achieved in at least some jurisdictions in the 1980s. Many state authorities do not recognise TESOL as a specialist teaching area. Only one teacher accreditation body (NSW Education Standards Authority/NESA) makes publicly available specific information on accreditation requirements for EAL/D teaching. See ACTA QITE Review submission, p.11, at:https://tesol.org.au/wp-content/uploads/2019/01/ACTA-final-submission-Quality-Initial-Teacher-Education-Review.pdf,

[100] From the late 1990s onwards, many moved towards catering solely for the lucrative market of overseas English language teachers seeking Masters degrees. Content appropriate to the Australian context dissipated or disappeared, along with school-based teaching practica (ACTA QITE Review submission, p.13). Closed borders as a result of the COVID-19 pandemic has exposed the vulnerability of depending on international student fees, causing TESOL programs to be disbanded altogether (ACTA QITE Review submission, p.12).

[101] For example, La Trobe University closed its Master of Applied Linguistics and Master of TESOL programs due to reduced international student enrolments. Restructures in state and territory education systems have also affected tertiary TESOL provision. For example, Charles Darwin University discontinued its Graduate Certificate in TESOL course in 2016 after the Northern Territory education department disbanded its EAL/D unit, which sponsored the program. This was the only tertiary course which specifically focused on how teachers can address the EAL/D learning needs of Indigenous students in remote schools. A 2021 ACTA survey found that only two specialist TESOL programs in Australia met minimum standards. See also ACTA 2021 submission to the *Quality Initial Teacher Education Review.* Appendix B at: https://tesol.org.au/wp-content/uploads/2019/01/ACTA-final-submission-Quality-Initial-Teacher-Education-Review.pdf

[102] The amended Standards and Procedures should include specific guidance on granting advanced standing/partial credit for specialist TESOL courses offered by higher education providers. The revised document should also provide specific guidance on the broad issue of the acceptability for teacher accreditation purposes of virtual, online practicums where physical practicums are not possible due to COVID-19 breakouts.

[103] House of Representatives Standing Committee on Employment, Education and Training, 2022, *Don't take it as read: inquiry into adult literacy and its importance,* p. 107.

[104] Where specialist instruction exists, different modes of EAL/D provision can be found. The specialist EAL/D literature has extensively canvassed the advantages and disadvantages of these various modes. Well-trained EAL/D specialists would be familiar with this literature and able to advise their schools and school leadership accordingly. Schlaman, H. (2019). Designing structures and pathways to support language development and content learning for English learners: Dilemmas facing school leaders. *International Multilingual Research Journal*, 13(1), 32-50.

[105] Research highlights the key role played by school leadership in building inclusive whole school systems of support that meet the language learning needs of EAL/D students. Such leadership is characterised as distributed across the school and distinguished by an informed instructional focus that involves: promoting effective pedagogy and collective staff responsibility for progress towards shared goals; ongoing collection and formative use of appropriate data to monitor student engagement and achievement for instructional improvement and whole school planning; developing strong professional development support programs for all staff; and assisting parent and family participation and building school-community relationships, e.g.
Calderón, M., R. Slavin, & M. Sánchez, M. (2011). Effective instruction for English learners. *The Future of Children*, 21, 1, pp. 103-127;
Casteel, C. J., & Ballantyne, K. G. (2010). Professional Development in Action: Improving Teaching for English Learners. *National Clearinghouse for English Language Acquisition & Language Instruction Educational Programs*.
DEEWR English as an additional language or dialect (EAL/D) effective school practices (nsw.gov.au); *Successful Language Learners (SLL)* project in DEC NSW (2011). *Literacy and Numeracy Pilots: Final Report.*: Canberra. Accessed at:
https://www.cese.nsw.gov.au//images/stories/PDF/Eval_Rep/Schools/Teach_Learn_Share_22_Successful_Language_Learners.pdf;
Esch, K. S. V. (2018). Teacher leaders as agents of change: Creating contexts for instructional improvement for English learner students. *The Elementary School Journal*, *119*(1), 152-178;
Elfers, A, & Stritikus, T. (2013) How school and district leaders support classroom teachers' work with English language learners, *Educational Administration Quarterly*, 20, 10, pp. 1-40;
Horwitz, A., Price-Baugh, R., Simon, C., Uzzel, R., Lewis, S., & Casserly, M. (2009) Succeeding with English Language Learners: Lessons Learned from the Great City Schools. *Council of the Great City Schools*: Washington DC;
Lavadenz, M., Kaminski, L. R. G., Armas, E. G., & López, G. V. (2021). Equity Leadership for English Learners During COVID-19: Early Lessons. *Frontiers in Education*. https://doi.org/10.3389/feduc.2021.636281;
McGee, A., Haworth, P., & MacIntyre, L. (2015). Leadership practices to support teaching and learning for English language learners. *TESOL quarterly*, *49*(1), 92-114;
Menken, K., & Solorza, C. (2015). Principals as linchpins in bilingual education: The need for prepared school leaders. *International Journal of Bilingual Education and Bilingualism*, *18*(6), 676-697;
Russell, F. A., & Von Esch, K. S. (2018). Teacher leadership to support English language learners. *Phi delta kappan*, *99*(7), 52-56;
Scanlan, M., & López, F. (2012) ¡ Vamos! How school leaders promote equity and excellence for bilingual students. *Educational Administration Quarterly*, 48, 4, pp. 583-625;
Stufft, D. L., & Brogadir, R. (2011). Urban principals' facilitation of English language learning in public schools. *Education and Urban Society*, 43, 5 pp. 560-575;
Schlaman, H. (2019). Designing structures and pathways to support language development and content learning for English learners: Dilemmas facing school leaders. *International Multilingual Research Journal*, *13*(1), 32-50.

[106] ACTA's 2016 national EAL/D survey revealed widespread erosion in school EAL/D programs caused by principals and school leaders' lack of understanding of EAL/D students' learning needs when making decisions about school programs. COVID-19 has also disrupted collaborative EAL/D teacher-school leader planning processes necessary for effective EAL/D program targeting and implementation and has highlighted the need to develop adaptive leadership able to lead through uncertainty.
https://www.aitsl.edu.au/research/spotlights/the-role-of-school-leadership-in-challenging
times#:~:text=The%20critical%20attributes%20of%20school,change%20direction%20rapidly%20if%20required.

[107] The Australian Education Union's recent survey of new educators (those with three or less years' experience) found that 62% felt they were underprepared in teaching students whose first language is not English and believed that their ITE did not sufficiently prepare them for this task.(*AEU, 2021, submission to QITE Review,* p.20). See also: *Rethinking Multiculturalism Reassessing Multicultural Education* (2013) Watkins, M., Lean, G., Noble, G.,& Dunn, K. Project Report Number 1, Surveying New South Wales Public School Teachers RMRME_Report_1.pdf (westernsydney.edu.au); Dobinson, T., & Buchori, S. (2016). Catering for EAL/D students' language needs in mainstream classes: Early childhood teachers' perspectives and practices in one Australian setting. *Australian Journal of Teacher Education (Online)*, *41*(2), 32-52.

[108] See ACTA submission to the QITE Review p.7, 9.

[109] The ACTA *EAL/D Standards Elaborations*, which were developed in consultation with AITSL, unpack the AITSL teacher standards for teachers working with EAL/D learners. It can be accessed at*:* Resources | Australian Council of TESOL Associations. *The Capability Framework for Teaching Aboriginal and Torres Strait Islander EAL/D Learners* elaborate standards of EAL/D teaching for Indigenous students from traditional language, creole or dialect backgrounds aligned to the Australian Professional Standards. It can be accessed at*:* Capability Framework - Teaching Aboriginal and Torres Strait Islander EAL/D learners (education.qld.gov.au)

[110] This national policy void impairs state and territory education systems' ability to ensure ongoing supply of trained EAL/D teachers and EAL/D teaching expertise for its linguistically diverse schools in the context of increasing staff attrition and retirement. (ACTA Submission to Quality Initial Teacher Education Review p.16)

[111] Under school autonomy policies, teachers usually can only undertake in school time professional development that reflects school or system priorities. In some education departments, there are no providers of EAL/D professional learning. Other central EAL/D education units in education systems have attempted to meet the ongoing need for EAL/D professional learning through school-based EAL/D professional development courses for mainstream teachers, such as South Australian ESL in the Mainstream Course, the NSW Teaching English Language Learners (TELL) course and the inter-jurisdictional Teaching Aboriginal and Torres Strait Islander EAL/D Hub These courses have assisted in up-skilling teachers but, in the absence of system requirements for mandatory basic EAL/D pre-

service training, they are effectively doing the 'heavy lifting' in a never-ending, catch-up process. With the successive retirement and loss of experienced EAL/D leaders, the sustainability of school based EAL/D professional development is at risk.

[112] International and Australian research highlights the growing gap between the linguistic diversity of schools in high immigration countries and the inadequate EAL/D pre-service training or in-school professional learning for classroom teachers of refugee and migrant students.
Hadjioannou, X., Hutchinson, M. C., & Hockman, M. (2016). Addressing the needs of 21st-century teachers working with culturally and linguistically diverse learners. *CATESOL Journal*, *28*(2), 1-29;
He, Y., Journell, W., & Faircloth, J. (2018). Preparing teachers for English learners: Integrating academic language and community service projects. *The Social Studies*, *109*(1), 13-26;
Johnson, T., & Wells, L. (2017). English Language Learner Teacher Effectiveness and the Common Core. *Education policy analysis archives*, *25*(23), n23;
Kolano, L. Q., Dávila, L. T., Lachance, J., & Coffey, H. (2014). Multicultural Teacher Education: Why Teachers Say It Matters in Preparing Them for English Language Learners. *CATESOL Journal*, *25*(1), 41-65;
Villegas, A. M., SaizdeLaMora, K., Martin, A. D., & Mills, T. (2018, April). Preparing future mainstream teachers to teach English language learners: A review of the empirical literature. In *The Educational Forum* (Vol. 82, No. 2, pp. 138-155). Routledge.

[113] Since the publication in 2012 of the *ACER National School Improvement Tool*, many education systems have developed their own school improvement tools for schools to use in evaluating school effectiveness and developing improvement plans. These tools are invariably generic and do not capture the particular processes necessary for implementing and developing effective whole school EAL/D programs. EAL/D focused planning and evaluation resource complements and informs generic national and system-based school improvement tools. See: Gurr, D., Acquaro, D., & Drysdale, L. (2022). The Australian Context: National, State and School-Level Efforts to Improve Schools in Australia. In *Evidence-Based School Development in Changing Demographic Contexts* (pp. 133-157). Springer, Cham.

[114] ACTA identified best practice standards for effective English language provision in schools in ACTA submission to the 2017 Inquiry into Migrant Settlement Outcomes, p.109-124

[115] https://www.theguardian.com/australia-news/2019/jan/29/stem-teacher-shortage-in-nsw-partly-blamed-on-lack-of-accurate-data;

[116] Australian Government, 2022, *Next Steps*, *Report of the Quality Initial Education Review*, p87, 88. Accessed at: https://www.dese.gov.au/quality-initial-teacher-education-review/resources/next-steps-report-quality-initial-teacher-education-review

[117] How does the ATWD work (aitsl.edu.au); https://www.aare.edu.au/blog/?p=9732;

[118] The last *ACER Staff in Australia's Schools survey* report on teachers and school leaders was published in 2013. National teacher workforce surveys allude to difficulties in recruiting specialist teaching staff, such as EAL/D teachers, in disadvantaged and hard-to-staff schools. The *AITSL Teaching Futures Background paper* merely alludes to ongoing demand for teacher specialisations and impending shortage of specialist teachers across the teacher workforce but provides no data. The 2020 *National Initial teacher Education Pipeline Data Report* contains two four-year old, unexplained statistical entries on EAL/D subjects completed in 2017 by undergraduate and post graduate secondary ITE students.

[119] Projected growth in student enrolments will greatly increase these teacher shortages with shortages spreading from rural to regional schools and disadvantaged schools being most impacted. See: NSW public school teacher shortage, likely to run out five years (smh.com.au);
https://www.smh.com.au/national/nsw/public-school-teacher-shortage-raises-fears-they-will-run-out-of-teachers-20211003-p58wtq.html;
https://www.theeducatoronline.com/k12/news/whats-being-done-to-address-teacher-shortages/278840;
NSW schools battle to fill jobs as teacher supply dwindles (smh.com.au);
https://news.nswtf.org.au/blog/media-release/2021/09/teacher-shortage-hitting-schools-across-sydney-and-regional-nsw; https://www.abc.net.au/news/2021-06-15/school-principals-dont-have-enough-maths-science-teachers/100214738
https://www.smh.com.au/education/profession-in-crisis-teacher-shortage-predicted-in-next-four-years-20190417-p51f2q.html;
https://www.theage.com.au/national/victoria/number-crunchers-find-poorest-schools-have-the-poorest-teachers-20200205-p53y2s.
html;The areas in which school enrolments are expected to double (smh.com.au); https://www.smh.com.au/national/nsw/one-in-six-teachers-working-outside-their-area-of-expertise-documents-reveal-20211007-p58y28.html

[120] https://www.abc.net.au/news/2015-02-07/teachers-warn-of-looming-crisis-over-esl-courses-in-nsw-schools/6077766; ACTA submission to Review of the Melbourne Declaration, p4. at: https://tesol.org.au/wp-content/uploads/2019/01/625_ACTA_submission_Review_of_Melbourne_Declaration_14_June_2019.pdf

[121] https://www.smh.com.au/national/nsw/nsw-schools-struggle-to-find-teachers-as-supply-collapses-20210621-p582w5.html;
https://www.smh.com.au/national/nsw/public-school-teacher-shortage-raises-fears-they-will-run-out-of-teachers-20211003-p58wtq.html;
https://news.nswtf.org.au/blog/media-release/2021/11/growing-teacher-shortages-and-nsw-could-miss-out-thousands-teachers#:~:text=The%20Department%20of%20Education%20warned%20last%20year%20NSW%20could%20run,teachers%20in%20the%20next%20decade

[122] Loss of centralised staffing support under school autonomy policies has made it difficult for schools to fill staff vacancies with suitably qualified teachers and has resulted in growing numbers of teachers teaching outside their area of expertise. 'Out-of-field' teaching impairs the quality of teaching, creates teacher burnout, undermines recruitment of trained teachers and teacher retention. As with STEM and special education, EAL/D teaching is affected. See: "Out-of-field teaching in Australian secondary schools" by Paul R. Weldon (acer.edu.au); Out-of-field teaching is out of control in Australian schools. Here's what's happening | EduResearch Matters (aare.edu.au);
One in six teachers working outside their area of expertise, documents reveal (smh.com.au);
https://www.smh.com.au/national/one-in-eight-stem-classes-taught-by-out-of-field-teacher-20200511-p54ru1.html;
Teaching 'out of field' in STEM subjects in Australia: evidence from PISA,(2015), at: https://apo.org.au/node/303739;
Du Plessis, A. E. (2020). Out-of-Field Teaching and Education Policy: International Micro-Education Policy. Springer Nature;
https://www.smh.com.au/national/one-in-eight-stem-classes-taught-by-out-of-field-teacher-20200511-p54ru1.html;
https://theconversation.com/too-many-teachers-teaching-outside-their-area-of-expertise-39688;
https://www.tapmagonline.com/tap/out-of-field-teaching-by-mariam-sambe;https://www.smh.com.au/education/teachers-burning-out-as-they-take-on-classes-outside-expertise-acer-report-20170423-gvqi08.html

[123] https://www.smh.com.au/national/nsw/regional-schools-scrambling-for-staff-during-summer-holidays-20201222-p56pjf.html;
'My teacher sucks': how teacher shortages shatter learning, at: https://www.aare.edu.au/blog/?p=10824 ;
https://www.smh.com.au/national/nsw/they-just-sit-there-the-schools-where-hundreds-of-lessons-are-cancelled-20210910-p58qn9.html;
https://www.smh.com.au/national/nsw/nsw-schools-struggle-to-find-teachers-as-supply-collapses-20210621-p582w5.html.
COVID-19 has further exacerbated this problem, increasing teacher shortages due to increased resignations from stress, dissatisfaction and vaccination non-compliance, and declining numbers of ITE applicants, e.g. https://research.acer.edu.au/cgi/viewcontent.cgi?article=1008&context=workforce;
https://www.theeducatoronline.com/k12/news/teachers-education-crisis-warning-goes-viral/212421;
https://www.theguardian.com/australia-news/2021/jul/04/everyones-bailing-australian-teachers-speak-on-stress-and-uncertainty-of-increasing-casual-contracts;
https://www.theguardian.com/australia-news/2021/jun/30/it-is-unsustainable-guardian-readers-on-the-crisis-of-australian-teacher-shortages.
Such COVID-driven teacher shortages are a world-wide problem. The teacher shortage is real, large and growing, and worse than we thought: The first report

in "The Perfect Storm in the Teacher Labor Market" series | Economic Policy Institute (ed.gov); America faces a substitute teacher shortage—and disadvantaged schools are hit hardest (brookings.edu); Teacher shortages - latest news, breaking stories and comment - The Independent; Covid: Supply teacher shortage could force schools to close - BBC News

124 https://www.smh.com.au/national/nsw-wants-defence-style-recruitment-campaign-to-plug-teacher-shortage-20210817-p58jim.html; Teacher Supply Strategy (nsw.gov.au); https://educationhq.com/news/act-launches-new-taskforce-to-tackle-teacher-shortage-100928/

125 https://tesol.org.au/wp-content/uploads/2019/01/ACTA-final-submission-Quality-Initial-Teacher-Education-Review.pdf, p. 11,16.

126 This growing staffing inequality between schools is characteristic of Australia, which, unlike most OECD countries, does not allocate the most qualified and experienced teachers to its most disadvantaged schools. See: AARE blog, The Government must know how to fix the teacher shortage. So why won't it act now? at: https://www.aare.edu.au/blog/?p=9732;

127 Australian Government, 2022, Next Steps: Report of the Quality Initial Teacher Education Review, Recommendation 17, p.92 accessed at: https://www.dese.gov.au/quality-initial-teacher-education-review/resources/next-steps-report-quality-initial-teacher-education-review

128 https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement p.23

129 https://www.dese.gov.au/quality-initial-teacher-education-review/resources/next-steps-report-quality-initial-teacher-education-review

130 E.g.https://www.oecd.org/coronavirus/policy-responses/education-and-covid-19-focusing-on-the-long-term-impact-of-school-closures-2cea926e/; https://educationendowmentfoundation.org.uk/guidance-for-teachers/covid-19-resources/best-evidence-on-impact-of-covid-19-on-pupil-attainment; https://www.educationnext.org/how-will-coronavirus-crisis-affect-childrens-learning-unequally-covid-19/; https://www.gov.uk/government/publications/learning-during-the-pandemic/learning-during-the-pandemic-quantifying-lost-time--2; https://www.chalkbeat.org/2020/10/6/21504195/covid-schools-learning-loss-projections-nwea-credo

131 https://www.ednc.org/how-is-covid-19-affecting-esl-students/; https://www.nytimes.com/2020/12/29/nyregion/coronavirus-english-language-students.html.
EAL/D learners in Australia are disproportionally affected, being concentrated in the two most populous states with the greatest COVID outbreaks and typically living in areas of harshest and longest lockdowns.
Language and learning loss: The evidence on children who use EAL (bell-foundation.org.uk); https://www.bell-foundation.org.uk/news/eal-learners-have-experienced-language-loss-in-addition-to-learning-loss-during-school-closures-teacher-survey-finds/#:~:text=EAL%20learners%20have%20experienced%20language,%2D%20The%20Bell%20Foundation&text=News%20%26%20Blog-,EAL%20learners%20have%20experienced%20language%20loss%20in%20addition%20to%20learning,school%20closures%2C%20teacher%20survey%20finds

132 See: https://www.sec-ed.co.uk/best-practice/closing-the-gap-supporting-the-most-disadvantaged-english-as-an-additional-language-pupils-during-the-pandemic-curriculum-catch-up/; https://www.sec-ed.co.uk/best-practice/covid-recovery-what-kind-of-support-will-eal-pupils-need-this-term-and-beyond-lockdown-curriculum-resources-schools-classroom-1

133 Language and learning loss: The evidence on children who use EAL (bell-foundation.org.uk) The research found that 54 per cent of teachers who taught English language learners reported that these students experienced language loss in writing skills, 50 per cent loss in speaking skills, 41 per cent loss in reading skills, and 36 per cent in listening skills. A large-scale study of year three and four students in NSW schools in the early stage of the pandemic found only the Year Three cohort in the least advantaged schools had experienced disruption to their mathematics learning. At that time, however, schools had been closed for only two months and any impacts on EAL/D learners were not considered. See: Gore, J., Fray, L., Miller, A., Harris, J., & Taggart, W. (2021). The impact of COVID-19 on student learning in New South Wales primary schools: an empirical study. *The Australian Educational Researcher*, *48*(4), 605-637

134 https://www.sec-ed.co.uk/best-practice/closing-the-covid-19-gap-for-eal-pupils-english-as-an-additional-language-teaching-resources-covid-19/; Language and learning loss: The evidence on children who use EAL (bell-foundation.org.uk); https://www.mckinsey.com/industries/public-and-social-sector/our-insights/covid-19-and-learning-loss-disparities-grow-and-students-need-help

135 See: Cummins, J. (2008). A national study of school effectiveness for language minority students' long-term academic achievement.

136 Educational recovery from COVID-19 requires pedagogies of acceleration rather than remediation. See: Almarode, J., Hattie, J., Fisher, D., & Frey, N. (2021). *Rebounding and reinvesting. Where the evidence points for accelerating learning*. A GOLD paper. Thousand Oaks, CA: Corwin. Retrieved from https://us.corwin.com/ en-us/nam/white-paper-reinvesting-and-rebounding;
Carroll, K. (2021). *The Acceleration Imperative: A Plan to Address Elementary Students' Unfinished Learning in the Wake of COVID-19*. Version 2.0. Thomas B. Fordham Institute. Retrieved from https://files.eric.ed.gov/fulltext/ED616314.pdf

137 EAL/D learners experience particular barriers to participating in and benefiting from remote online teaching due to the digital divide and restricted opportunities for interactive language learning, See: e.g. https://www.oecd.org/coronavirus/policy-responses/strengthening-online-learning-when-schools-are-closed-the-role-of-families-and-teachers-in-supporting-students-during-the-covid-19-crisis-c4ecba6c/.

138 The Victorian and NSW Governments have invested large sums of money into short-term, 'catch-up' tutoring programs for students affected by the pandemic. As the English language and literacy learning needs of EAL/D learners were not targeted, it is not known whether and to what extent EAL/D learners have participated in and benefited from these programs. See: NSW students benefit from tutoring program; Tutor Learning Initiative: Policy | education.vic.gov.au; Learning the lessons from the long school lockdowns - Grattan Institute; https://www.audit.nsw.gov.au/our-work/reports/covid-intensive-learning-support-program; The adequacy of the UK programs Australia's programs are modelled on have been the subject of strong criticism: https://www.theguardian.com/education/2021/jun/02/union-criticises-pitiful-covid-catch-up-plan-england-pupils; https://www.dailymail.co.uk/news/article-9643291/Gavin-Williamson-squirms-schools-Covid-catch-plan.html; https://www.theguardian.com/politics/2021/jun/02/education-recovery-chief-kevan-collins-quit-english-schools-catch-up-row;
See also: Gorard, S., Siddiqui, N., & See, B. H. (2017). What works and what fails? Evidence from seven popular literacy 'catch-up' schemes for the transition to secondary school in England. *Research Papers in Education*, 32(5), 626-648.

139 See: https://www.bell-foundation.org.uk/news/blog-why-it-is-important-for-schools-to-support-eal-learners-to-mitigate-language-and-learning-loss-and-how-best-to-do-it/; EAL: Pupils who speak English as an additional language need more support after COVID, at: https://www.bbc.co.uk/newsround/57475574; https://www.bell-foundation.org.uk/eal-programme/guidance/effective-teaching-of-eal-learners/

140 https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement ps.23,24

141 AERO's charter is to 'establish an independent national evidence institute to inform teacher practice and system improvement.' Identifying the English learning needs and progress of EAL/D learners with appropriate English assessment tools will be critical to the success of this research effort.

142 ACTA submission to the Productivity Commission's *Inquiry on the National Education Evidence Base at:* http://www.pc.gov.au/__data/assets/pdf_file/0004/208903/subdr120-education-evidence.pdf ;ACTA submission to the *Review to Achieve Educational Excellence in Australian Schools* at: https://tesol.org.au/wpcontent/uploads/2019/01/580_ACTA_full_submission_to_Gonski_Review_.pdf

143 In the absence of this measure, and as a proxy for it, the Australian Government has relied on an invalid and inaccurate language background other than English (LBOTE) category to report on students from culturally diverse backgrounds. The ACARA (2020) National Measurement Framework for Schooling in Australia at: https://www.acara.edu.au/docs/default-source/default-document-library/measurement-framework-2020-for-

pubafa92e404c94637ead88ff00003e0139.pdf?sfvrsn=1c3d4d07_0 perpetuates the invisibility of the EAL/D learner cohort by continued reliance on language background as a population-based attainment measure for reporting evidence of the outcomes of schooling.

[144] See note 40.

[145] ACARA *Data Standards Manual: Student Background Characteristics*, Sixth Edition, October, 2012; House of Representatives Standing Committee on Employment, Education and Training, Inquiry into Adult Literacy and its importance Report, *Don't Take it as Read,* p.92

[146] In reviewing the framework, the working group were to consider options for further action and provide expert advice regarding a possible national trial. It was found that the Framework needed considerable effort to update as some states and territories have introduced different approaches to assessing English language proficiency of EAL/D students. (Senate Estimates question on notice, SQ 21-01003)

[147] As validation of the *EAL/D Learning Progression* was limited to EAL/D learners from migrant and refugee backgrounds, further validation is needed in relation to Indigenous EAL/D learners.

[148] The NSW Government education system has shown that use of the EAL/D Learning Progression by teachers for assessing and reporting the EAL/D learner cohort is accurate, reliable and trustworthy. Since trialling and validating teachers' use of the tool in 2012, it has been successfully using the EAL/D Learning Progression as a measure of English language proficiency for needs-based resource allocation to schools. In 2021, the Department also commenced annual public reporting of EAL/D students against the four phases of the EAL/D Learning Progression. A national survey of school systems conducted in 2020 found that many Government and Catholic education systems were already using the EAL/D Learning Progression to identify or report on EAL/D learner needs. The further review should ensure that experts in EAL/D learning and assessment are given leading roles in this project and that consultation occurs with teachers and other educators responsible for using EAL/D assessments.

[149] https://www.dese.gov.au/quality-schools-package/resources/national-school-reform-agreement p.24

[150] Although Government funding is calculated with reference to students enrolled at a school, schools and school systems are not required to spend specific amounts of funding on individual students or designated student groups. This includes funding provided under each of the loadings for disadvantage, including the low English proficiency loading. (Answers to Senate Estimate questions on Notice SQ18-650, SQ18-651, SQ19-129. Answer to Question on Notice SQ18-651)

[151] AUSTRALIAN EDUCATION ACT 2013 - SECT 78 Ongoing funding requirements for approved authorities (austlii.edu.au)

[152] Accountability for Commonwealth funding is limited to a financial acquittal process relating to the distribution of base and loading amounts in a block funding report. 2019 National Schools Resourcing Board Review of Needs Based Funding Requirements, Final Report at:https://www.dese.gov.au/national-school-resourcing-board/resources/review-needs-based-funding-requirements-final-report-december-2019

[153] Sydney Morning Herald at: https://www.smh.com.au/politics/federal/government-rejects-bipartisan-call-for-more-scrutiny-of-school-funding-20191205-p53h63.html;
https://www.smh.com.au/national/nsw/education-department-loses-track-of-millions-in-disadvantage-funding-20200408-p54ia1.html
A 2017 Auditor-General ANAO Report found that the Commonwealth Department of Education and Training had not: i) effectively monitored distribution of funding to approved system authorities to assure that funding was being allocated on a needs basis; ii) monitored whether approved system authorities' funding models were publicly available and transparent; iii) established processes that provided the level of transparency and accountability envisaged under the Act; or iv) fully utilised available data to inform the development of current and future educational policy. In 2018, a Joint Committee of Public Accounts and Audit endorsed these recommendations and further recommended changes to the legislation and regulations that required the Department to undertake compliance monitoring, a recommendation subsequently rejected by the Department. A 2021 follow-up to the 2017 audit found the Department had not made sufficient progress in ensuring transparency of Australian Government funding allocations as prescribed in the Act, and noted that implementation in this area was not scheduled until 2022. A 2020 NSW Auditor-General's audit report found that the NSW Department of Education and Training did not have adequate oversight of how schools were using their Gonski needs-based funding to improve student outcomes since it introduced its *Local Schools Local Decisions* policy in 2014, allocating hundreds of millions of additional funding for disadvantaged students without keeping track of how it was spent or whether it was helping those students.

[154] Submission 108: Australian Council of TESOL Associations, 2017. Submission and Supplementary Submission to the Parliamentary Inquiry into Migrant Settlement Outcomes at: https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Migration/settlementoutcomes/Submissions. The 2016 ACTA survey found that available Commonwealth English language proficiency needs-based funding for schools was often not reaching the EAL/D student target group it was intended to assist. School autonomy and flexible funding policies were actively encouraging diversion of earmarked funds away from the EAL/D student target group resulting in the erosion of specialist EAL/D programs, leadership, staffing and expertise in schools.

[155] EAL/D service plans would include information about the number of EAL/D learners identified needing EAL/D support, those receiving EAL/D support, and the number and specialist training of EAL/D teachers allocated.

[156] ACTA submission to the 2017 *Inquiry into Migrant Settlement Outcomes*, p.65. For a best practice EAL accountability system, see *The accountability system English learners deserve,* at: https://www.sbceo.org/cms/lib/CA50000560/Centricity/Domain/55/CALTOG_Accountability_Digital.pdf

[157] The Commonwealth acknowledged that current arrangements do not allow visibility of state or territories' own expenditure on specialist English as an additional language or dialect (EAL/D) services. (Answer to Senate Estimates Question on Notice SQ19-129).

[158] NSRB Report at:https://www.dese.gov.au/national-school-resourcing-board/resources/review-needs-based-funding-requirements-final-report-december-2019

[159] Recommendation 7 para. 3.199 The Committee recommends that, as part of the new National School Reform Agreement, commencing in 2023, the Australian Government seek the agreement of the states and territories to ensure funding for schools is based on student enrolment rather than attendance. Recommendation 8 para. 3.208 The Committee recommends that, as part of the new National School Reform Agreement, commencing in 2023, the Australian Government seek the agreement of the states and territories to:
- require a proportionate number of qualified English as a second or additional language (TESOL) educators to be provided, on an ongoing basis, to the number of enrolled English as an Additional Language or Dialect (EAL/D) learners in schools
- undertake an appropriate and consistent EAL/D assessment for EAL/D learners in Australian schools, with the results of the EAL/D assessment, along with the number of qualified TESOL educators in schools, to be published alongside NAPLAN data on My School
- implement a replacement to the language background other than English identifier in the index of community socio-educational advantage that better identifies EAL/D learners for the purposes of school resourcing.

[160] DESE is the national agency with responsibility for legislative and program accountability.

[161] https://internationaleducation.gov.au/Regulatory-Information/Documents/ESOS%20Agency%20for%20Schools%20RPF%202018-19.pdf International student programs provide significant and increasing revenue streams for state and territory Governments. Annual student fees currently range between $11,110 and $18,980 across primary and secondary school. EAL/D programs are generally marketed by education systems as part of the school services available to overseas students.,

[162] Of this total, 128,998 were primary enrolments and 114,889 were secondary. Government school enrolments were 182,956 students, or 75% of the total. (Answer to Senate Estimates Question on Notice SQ19-130).

[163] Pre-enrolment English language assessments are often unreliable as they are typically conducted offshore in association with agents who have a vested interest in the application's success. Many international students therefore enrol in school with English language proficiency needs. Anecdotal reports from teachers, including EAL/D specialists, suggest some of these students suffer stress and inability to cope with the English language demands of the senior curriculum.

[164] Standard 6 of the current *National Code of Practice for Providers of Education and Training to Overseas Students* code (Student Support Services) requires schools to provide, at no additional cost, English and academic support services to overseas students as needed to enable them to achieve expected learning outcomes. No such explicit service entitlement exists for domestic EAL/D learners. See note below.

[165] https://internationaleducation.gov.au/regulatory-information/Documents/National%20Code%202018%20Factsheets/Standard%206.pdf

[166] The Australian Government's renewed deregulation agenda has further weakened the transparency and accountability of national reporting of international student programs. See: https://internationaleducation.gov.au/regulatory-information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/ESOS-Regulations/Pages/default.aspx#:~:text=The%20Education%20Services%20for%20Overseas,Australia%20on%20a%20student%20visa

Between 2016-2021, DESE, as the ESOS Agency for Schools, reported annual self-assessment results of CRICOS registered school providers' compliance in meeting the Standards of the *National Code of Practice* against six process KPIs of the Regulatory Performance Framework (RPF). See: https://www.dese.gov.au/esos-framework/resources/esos-agency-schools-regulatory-performance-framework-annual-report-202021;

In July 2021, the RPF was replaced by a Regulator Performance Guide and DESE will report from 2022 onwards through the Department's Annual Report against its three broad performance expectation principles. State and territory education providers will no longer be required to produce a standalone performance report but instead will be able to report publicly via their corporate plans and annual reports against their own principle-based performance measures. See: https://deregulation.pmc.gov.au/sites/default/files/regulator-performance-guide.pdf; Library of best practice | Deregulation (pmc.gov.au)

[167] For example, the two public education authorities with the largest number of international student enrolments, the NSW and Victorian Government school systems, failed to report complete figures for primary and secondary student enrolments (2014-2017) as required by Sections 48 and 50 of the Australian Education Regulation 2013. (Answer to Senate Estimates Question on Notice SQ19-130).

[168] https://internationaleducation.gov.au/regulatory-information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/ESOS-Review/Pages/default.aspx

[169] For example, anecdotal reports indicate that in some jurisdictions international students comprise the majority of enrolments in senior EAL/D English courses originally designed for domestic students with English language proficiency needs.

[170] https://www.legislation.gov.au/Series/C2004A00757

[171] https://internationaleducation.gov.au/regulatory-information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Pages/default.aspx

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