

LANGUAGE, LITERACY AND NUMERACY PROGRAM SERVICES

Response to LLNP Discussion Paper

This response to the Australian Government's Language, Literacy and Numeracy Program (LLNP) Services Discussion Paper has been compiled by the Australian Council of Adult Literacy (ACAL), a peak national body which promotes adult literacy and numeracy policy and practice.

ACAL advocates for a rights-based approach to the provision of effective education services to all Australian adults. We work to promote the quality of provision, equity of access and equity of engagement in adult literacy and numeracy provision for all Australians. Many of ACAL's members work for RTOs across Australia, rural and metropolitan, that provide services under the current LLNP contract. Our feedback is the result of consultation with LLNP providers and a range of other education professionals in the field.

ACAL acknowledges the value of a labour market program targeting jobseekers with low educational achievement and/or low levels of English language competence. People with low educational achievement and/or poor English language competence who are also marginalized in the job market are likely to be the most disadvantaged people in the community. These three indicators are also closely associated with many other factors including: poor health, disability, Aboriginality and incarceration. These combinations of multiple factors of disadvantage suggest that servicing the needs of people who are 'excluded' from many aspects of social engagement will be a matter of some complexity (Vinson, 2007). For this reason it is not realistic to imagine that addressing one aspect of this need – low language, literacy or numeracy skills – will necessarily produce a clearly defined, highly measurable outcome. It is even less realistic to suppose that acquiring an additional language, literacy or numeracy skill will, in and of itself, result in a person becoming more employable, or finding a job. When highly prescribed time limits are also imposed on the service provider, the whole educational undertaking is undermined.

ACAL therefore suggests that the assumptions on which this program is based be re-assessed. On the one hand, the Government is required to be accountable and demonstrate value for money. On the other hand, if the demands for accountability are met in ways that threaten the educational integrity of service provision, taxpayers' money is not being responsibly spent. We suggest that there are three questions that underpin an understanding of the program's effectiveness and these should form the basis of the Government's evaluation and monitoring strategy. These questions are:

- 1 What improvements does it make for clients?
- 2 How can we ensure that LLNP is offering best practice?
- 3 How can we ensure value for money?

Measuring outcomes

Given the comments above concerning the complex needs of clients referred to the LLNP we therefore suggest that the Government re-evaluate the usefulness of reporting LLN outcomes in isolation. There are two other scales that are highly appropriate for measuring more complex outcomes. These are: the OECD Wellbeing indicators and the ABS Social Capital measures. The applicability of these scales to capture outcomes from adult literacy and language programs has already been tested (Balatti, Black , Falk, NCVET, 2006). There would be several advantages to using these indicators. Factors likely to produce social inclusion are clearly linked to developing employability skills; good networking skills might result in finding employment where an extra NRS level will have not impact by itself. Moreover, addressing these social connectivity outcomes in educational settings means teachers make these explicit to students and self-awareness is an important part of learning. If the assessment of these behaviours is undertaken in conjunction with learners, the assessment process becomes part of the learning and reflection on learning cycle. The inclusion of these sets of indicators as outcomes in the LLNP is likely to produce better program outcomes that are in line with both the Government's Productivity Agenda and its Social Inclusion Agenda.

A range of issues related to current assessment and reporting have already been identified and we appreciate that you will be well aware of these as a result of your on-going consultations with providers. We therefore note the issues but will not add further comment:

- Too much time spent on administration and reporting
- Difficulties with the on-line reporting tool
- Inappropriate timeframe (160 hours for 2 NRS improvements)
- Doubling of assessment burden (NRS in addition to accredited course).

Program Flexibility

There are several issues that relate to program inflexibility and the difficulties are most clearly seen in programs delivered to Aboriginal people, especially, but not exclusively those in remote areas. These inflexibilities relate to managing the obligations required of jobseekers receiving various forms of

income support, including the requirement for minimum hours of attendance, the requirement to take up employment if it becomes available – even if very short term - and the imperative to achieve NRS gains within set time limits. The requirement to report NRS outcomes and the frequency of reporting also impose constraints on providers. We note that there are proposed changes to employment programs, including changes to non-compliance participation failures (breaches,) and we anticipate that these will be beneficial for both clients and providers.

Consultations with providers of LLNP to Aboriginal individuals and in regional or remote communities suggest that the following factors could improve the quality and outcomes for program delivery in all contexts:

- ◆ Community ownership: input into planning (content, timing, teachers, location)
- ◆ Delivery of LLN program integrated with community-determined practical project or enterprises
- ◆ Teaching LLN inside programs with other practical outcomes and focus:
 - Sport
 - Sewing
 - Men's sheds
 - Cooking
 - Art
 - Music
- ◆ Provision for team-teaching to enable an LLN specialist to teach alongside a specialist in another area (possibly delivering a VET qualification)
- ◆ Provision for interpreters or cultural aides to address difference in values and cultural conceptualizations between Anglo-Saxon professional and the range of other cultures and experiences represented in LLNP classrooms
- ◆ A move away from the NRS as the single tool to measure program outcomes (see discussion above).

There may be value in considering a separate LLNP Program for Aboriginal communities, however, the features listed above are likely to improve engagement and outcomes in many settings including those that involve Aboriginal clients in metropolitan settings.

Quality

The quality of LLNP provision has been impacted by the process of tendering. An intended (or unintended) effect of tendering has been to push down the costs of provision. This means that new providers have entered the market on the basis of offering lower costs and not all of them have the capacity to deliver quality programs. If costs continue to be pushed down, none of them will be able to deliver quality programs. Quality indicators must include high standards for staff skills, including relevant qualifications and the provision of appropriate professional development opportunities. These must be built into program costs so that appropriate staff will be attracted and retained. In order to ensure that LLNP service providers meet a suitable benchmark for quality, we suggest that they have been awarded an AOTF Excellence status for delivery of English language, literacy and numeracy programs to adults. Tenders should clearly demonstrate how the costs of employing suitably qualified staff at award rates, and providing these staff with on-going professional development have been included in the pricing. It may be possible for DEEWR to give a signal to the market as to anticipated pricing levels possibly by indicating a lowest benchmark price. There are no indications that the time and effort spent in verifying NRS outcomes is particularly effective in ensuring quality provision for clients.

Quality provision in adult language, literacy and numeracy programs is characterized by a focus on customizing teaching and learning for individual students and taking into account differences between them. One size does not fit all. Good adult education programs share these characteristics:

- ◆ Recognising differences between cultures and explicitly teaching Western norms
- ◆ Bringing the social and other worlds of the student into the classroom
- ◆ Connecting language learning in all forms to the authentic life experience, interests and goals of individuals
- ◆ Building relationships both between teachers and students and between students.

Where there are compliance issues in LLNP program delivery that counteract any of these principles of quality learning environments, then the effectiveness of the program is compromised. Where effectiveness is reduced, value for money is also reduced. The challenge for Government is to design a program that meets accountability requirements but in so doing does not reduce effectiveness for clients. Accountability measures can, over time, operate as reductionist forces since they often require the simplification of complex environments to small measurable components. We believe there

should be a distinct shift towards an increased trust in and reliance on professional knowledge - where professional knowledge and capacity is demonstrably present. Tender documents should seek to identify evidence that professional knowledge and capacity exists. Where capacity exists, providers will be able to produce records of enrolments, completion and student satisfaction.

SUMMARY OF DISCUSSION WITH ACAL STAKEHOLDERS

1. How effective is the LLNP in preparing clients for daily life and employment?

As well as developing individuals' language literacy and numeracy skills the Program supports the Government agenda of social inclusion by providing training to the most disadvantaged groups of job seekers. Individual clients gain access to social and employment networks and a support structure. Many increase in confidence and the broader set of Employability Skills and the Program needs to recognize these gains alongside outcomes in the core skills areas.

It is critical that RTOs providing training as part of the Program are able to:

- customise the training to meet individual needs
- develop clients LL&N skills relevant to their employment goals
- provide clients with learning pathways to vocational training as relevant.

The ideal LLNP delivery model is where learning programs are individualised for each client and focus on the particular set of literacy, numeracy and/or English language skills which need to be developed. Some of the Program outcomes and performance measures need to be modified to ensure that the Program is flexible enough to make it relevant to the needs of individual clients and their local employment environment.

With the exception of groups of skilled migrants who access the program, many LLNP clients are assessed at the lower end of the NRS scale on entry and will require a lengthy period and considerable support to meet Program benchmarks in the required blocks of hours.

The Discussion Paper (P2) highlights identified skills shortages and the need for more workers with vocational skills at Advanced Diploma and Diploma levels. Given the non-linear nature of adult literacy and numeracy gains, it is unlikely that many LLNP clients will bridge their skills gaps sufficiently to be able to successfully study towards these higher VET level qualifications in allocated time frames .

2. What could the LLNP learn from other programs?

There are features of other Commonwealth funded programs that could be adopted by future LLNP funding rounds which would enhance the flexibility of the Program and make it more relevant to clients.

Adult Migrant English Program (AMEP)

This Program allocates a bank of 510hrs to clients but does not break this allocation into smaller blocks with identified NRS (or ISLPR) increase required as client outcomes. The AMEP requires quarterly reports on client progress.

A similar arrangement for the LLNP would recognize the accepted principle that literacy and language learning rates differ and that many clients, with educationally disadvantaged backgrounds and multiple barriers to learning, will take longer to gain the required literacy and numeracy skills.

The AMEP includes a program for Rural Regional Intensive provision. This feature would be valuable in the LLNP as it would allow client hours to be used more flexibly in rural and regional areas where client numbers are lower and where there are significant distance and isolation issues impacting on provision.

The future LLNP contract period should be extended from three to five years in line with the AMEP to increase the efficiency of the contracting process.

Workplace English Language and Literacy Program (WELL)

The WELL program participants are assessed against the NRS pre and post training and these outcomes are provided to DEEWR. WELL program participants access language, literacy and numeracy training to meet the needs of their workplace context. They do not have to meet specified NRS gains within a given timeframe. The professional expertise of WELL teachers is recognised in negotiating and delivering programs to meet workplace and participants needs. LLNP teachers need the same flexibility to develop programs to meet their clients' needs.

Future LLNP programs could also adopt a more considered view of verification. There is no verification of WELL program files or pre-training assessments, the professional expertise is recognized and there is no layer of micro management. All LLNP providers are subject to AQTF audit and onerous program verification appears to be duplication of effort. The funding currently being used for verification could better be used for local moderation meetings and professional development opportunities for those delivering the Program.

LLNP milestone payments to providers need to be reviewed to bring them more in line with WELL milestone payments or those used for the DEEWR Productivity Places Program.

3. What kind of flexibilities should be incorporated into Program delivery and why?

More capacity for LLNP providers to respond flexibly to clients' needs and offer a case management approach is critical for future LLNP programs. The Review

Report of the Language Literacy and Numeracy program (DEST, 2005) advocated adjusting programs to meet individual needs and strengthening and supporting innovative LLNP programs to clients who had shown poor outcomes eg Indigenous Australians, younger males and people with a disability. We would advocate that all future LLNP programs have the capacity for flexible and innovative solutions to better engage the broader LLNP client group.

Future LLNP guidelines need to allow providers to:

- Conduct the initial client interview and assessment and allocate clients to the most appropriate program based on achievable goals and the learner's individual capacity to participate.
- Recommend clients number of hours per week from 6-25 hrs depending on the learners circumstances. This would assist those in isolated communities and also allow learners to commence at a level of learning where they can achieve and gradually build up hours as skills and confidence develop.
- Include relevant vocational training with integrated LL&N skills development at any level of the LLNP where the client will benefit from this form of training and there is a realistic vocational pathway.
- Report clients' gains against Social Capital indicators (eg self management, initiative and enterprise, team skills, planning and organising and problem solving). This would reflect more realistically the gains that clients make in confidence and self esteem in addition to specific language, literacy, numeracy and learning skills gains.

Attendance

There needs to be more flexibility incorporated into the LLNP program relating to client absence to reflect the employment context they are being prepared for. An "LLNP leave form" would be a fair way for clients to document reasonable absence and provide them with an authentic literacy text for practical skills development.

Flexible delivery

The current Program operates with unnecessarily rigid guidelines which are not in line with current government policy about flexible delivery in the VET sector. LLNP providers need to be able to customise programs to clients' needs and incorporate relevant delivery models. These could include: face to face, online or distance delivery or mixed mode, programs involving mentoring and additional tutoring, voluntary work or work experience components as relevant and programs delivered in partially or fully in a community context.

4. How can the current servicing arrangements be improved to provide better outcomes for the client?

The Australian Council of Social Service (ACOSS) in its paper, *Welfare to Work – effects and solutions* (2008), notes that those who are unemployed in the current job market tend to be highly disadvantaged with over 60% of those on single parent benefits having less than Year 10 level of education. Many face multiple barriers to work such as transport, child care, and many experience mental illness and poor health. LLNP program servicing arrangements need to be adjusted to take into account client barriers.

Barnett and Spoehr (NCVER, 2008) in their report, *Complex not simple: The vocational education and training pathway from welfare to work* advocate a case management approach, coordination of support services, assistance with child care and transport for disadvantaged students and collaboration at both policy and delivery levels across sectors.

Travel allowance

Current arrangements relating to travel allowances need to be reviewed. Clients, especially those in rural areas, are experiencing hardship relating to rising fuel and subsequent travel costs.

Child Care

Lack of child care provision is a major factor impacting on potential client participation. The ability for LLNP providers to work collaboratively with community based organisations could address some local child care issues. The ability for clients to bank hours or participate through negotiated flexible delivery options during school holiday periods would also help address issues of hardship relating to child care.

Moderation/Verification arrangements

There is too much emphasis in the current program on verification processes. This seems at odds with emphasis in the VET sector on individual RTO responsibility to meet AQTF standards through a process of continuous improvement. If DEEWR ensures the professional standards of LLNP contractors through the tender selection process, the providers should be responsible for demonstrating their staff have the relevant qualifications and experience to make valid LL&N assessments of clients.

Rural LLNP providers are currently disadvantaged by the cost of travel for their staff in distant locations to attend moderation sessions. We recommend moderation sessions be held at a range of locations or technology be used to enable more widespread participation.

5. What structures for program delivery would best meet clients' needs and ensure successful outcomes, particularly for disadvantaged clients (eg Indigenous Australians) and clients with multiple barriers to learning?

Consultation with providers of LLNP to Aboriginal individuals and communities suggest that the following factors could improve the quality and outcomes for program delivery in all contexts:

- Community ownership: input into planning (content, timing, teachers, location)
- Delivery of LLN program integrated with community-determined practical project or enterprises.
- Teaching LLN inside programs with other practical outcomes and focus:
 - ◆ Sport
 - ◆ Sewing
 - ◆ Men's sheds
 - ◆ Cooking
 - ◆ Art
 - ◆ Music
- Provision for team-teaching to enable an LLN specialist to teach alongside of a specialist in another area (possibly delivering a VET qualification)
- Provision for interpreters or cultural aides to address difference in values and cultural conceptualizations between Anglo-Saxon professional and the range of other cultures and experiences represented in LLNP classrooms.
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There may be value in considering a separate LLNP for Aboriginal communities, however, the features listed above are likely to improve engagement and outcomes in many settings including those that involve Aboriginal clients in metropolitan settings.

6. What innovations could be implemented to encourage participation of Indigenous clients in remote areas?

In addition to the comments above there are other significant issues that impact on providers operating in remote regions. These factors all impact on cost and on producing outcomes that replicate programs in metropolitan area:

- ◆ Need to provide separate, gendered classes
- ◆ Very small groups
- ◆ Teachers must travel long distances (6 hours each way) and be found accommodation
- ◆ Minimal existing infrastructure of any kind
- ◆ No existing employment opportunities

In communities that are covered by the NT Emergency Response, LLNP must be very well-integrated with other Government programs and initiatives. This will require planning and community consultation as well as great flexibility, creativity and innovation in administering the LLNP.

A version of LLNP delivery for remote communities could include a program to orient community members to participation in the regimes that are taken for granted in western communities. The values and skills that people might need to learn include different understanding about time, workplace expectations as well as language and literacy skills appropriate for dealing with western bureaucracies and western workplaces.

People in remote communities need at least double the hours of entitlement.

7. How could specialized services such as Advanced Vocationally Oriented Courses (AVOC) and Complementary Training (CT) be improved?

LLNP AVOC Programs could be improved and made more relevant to clients' needs by:

- reducing the unrealistic expectation that clients can increase an NRS level in 5 macro-skills during the program. This negates individual differences and spiky profiles and does not recognise the considerable jump between higher NRS levels.
- allowing learners, where relevant, to do 'vocational tasters' instead of skills development in a specific vocational area.
- not making a work experience placement mandatory. In rural areas work experience places are increasingly difficult to organise. Alternative arrangements such as work or industry projects, work visits

or volunteer work could be incorporated into AVOC programs as options.

- LLNP providers not having to map vocational units of competency to NRS levels. This is a complex and time consuming process.

Features of LLNP Complementary Training Programs should be 'mainstreamed' or allowed as part of regular LLNP provision. Community or workplace partnership should be allowable at the discretion of the provider to meet the needs of the community and the clients.

8. How can the linkages between LLNP providers and referring agencies (Centrelink and Employment Services Providers, including Job Network Members [JNMs]) be improved?

The linkages between agencies could be improved by:

- more accurate referrals from Centrelink. Expand the Job Seeker Index to include more sophisticated ways of identifying language, literacy and numeracy barriers.
- regular regional meetings
- better communication between agencies so that students are not absent from classes to attend job interviews
- better electronic systems
- someone to be take 'ownership' of the program at Centrelink offices so there is a clear contact person.

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

It would appear that the program is cost effective for the government, but not for providers. The hourly rate of approximately \$9 per hour in many cases does not cover the providers costs of providing the service – mainly because of the onerous reporting and verification requirements. Time (and therefore money) spent on administration and verification seems to outweigh training in many cases. Indeed, it appears that the LLNP is far more punitive and burdensome in its reporting requirements than other programs such as WELL or the AMEP. It also seems strange that someone with a HECS loan and/or on Youth Allowance and attending university is not subject to nearly the same scrutiny in terms of achieving targets as LLNP students.

It would be far more cost effective for training providers to deliver accredited curriculum, mapped to the NRS, and which allows for individual learning plans. Measurement of outcomes would be then based on unit/subject/course completion rather than individuals having to achieve often unrealistic jumps in two NRS levels. Again, if the comparison is made with university students, they complete subjects and courses not some individual indicator. A comparison can also be made with someone on a Newstart Allowance studying a Certificate III course. They are expected to course complete but are not subject to individual measurement hoops.

Many rural providers are particularly concerned with the imposts of the verification process. Travel to regional areas is a significant cost, which is borne by the provider, not the verifying agency or the government. Technology may provide a far more cost effective way of meeting moderation/verification requirements.

An observation that was frequently made by respondents was the punitive nature of the LLNP system. Students often feel pressured by Centrelink and their benefits are often swiftly withdrawn with little understanding of personal circumstances. Providers are increasingly feeling the pressure of being the government's 'policeman'. This is hardly conducive to social capital building and social inclusion.

10. How could the current measurement of educational outcomes and client achievement be improved?

A major theoretical underpinning of all current adult literacy programs, literacy as social practice, is challenged by the program requirements of clients' progression of two NRS indicators in set timeframes. The focus on progression against indicators tends to lessen the LLNP providers capacity to deliver holistically and customise programs to individuals.

The NRS was designed as a reporting tool, not an assessment tool. LLNP providers are required to deliver programs using accredited LL&N courses which have been developed with sound educational pathways and meet the scrutiny of the vocational accreditation system. These courses are mapped to the NRS. It would be more educationally sound to report against course outcomes and unit/module completions.

Language or literacy learning is not always an upward progression. Students may plateau or appear to regress as they process new learning or move to a new level of competence. It would be a more realistic measure to report achievement against accredited courses over a longer bank of hours. An expectation of a clients' capacity to progress could be flagged in the initial learning plan and reporting timeframes adjusted to the individual.

Current client progress expectations do not take into account any individual difference such as clients' literacy in their first language, age, psychological barriers to learning, levels of education, and levels of self esteem. While providers can complete a waiver in situations where clients are unable to meet program targets it would be a more positive education experience if individual targets (perhaps from a range of options) could be identified initially and modified as clients progress through their training. This reflects quality adult literacy practice where goals are jointly negotiated and learners are involved in the learning process and in meeting attainable goals.

Nationally recognised Employability Skills underpin the current VET system and are incorporated into vocational Training Packages. They are recognized as key components impacting on an individual's employability. While some of the Employability Skills such as Communication and Learning can be mapped to the NRS indicators, many are not adequately reflected in the NRS. LLNP providers comment on the increases in personal skills many clients make during periods of training that are not adequately captured in the current reporting requirements. A set of graduated outcomes against the employability skills would be a way of capturing additional gains made by clients.

11. What are the facets of the program that could enhance and what are the ones that could inhibit providers from meeting the program benchmarks (KPIs)?

Facets that enhance KPIs include:

- flexibility
- use of suspensions where necessary
- mixed mode of delivery with varying training options, eg a bank of hours that can be used in flexible ways, not a rigid 10 hours or 15 hours per week so that individual learning needs and circumstances are met
- negotiation of a learning contract with students.

Facets that inhibit KPIs include:

- inappropriate referrals (see question 8 – Linkages)
- child care and transport difficulties
- waiver forms (time consuming to complete etc) would be unnecessary if students were being case managed
- onerous reporting and paperwork

- problems with the technology (LLNPIS II)

12. Do the current payment structures to LLNP service providers drive improved outcomes? What improvements could be made?

Current milestone payments need to be reviewed to bring them in line with other Commonwealth funded programs. LLNP providers make a considerable investment upfront in preparation of materials, course planning etc and this needs to be recognized by a larger initial payment.

13. Should providers be financially rewarded if their clients gain employment? How would it be measured?

YES! Responses to this question were resoundingly affirmative. Providers feel that if a student is being sent to a language, literacy and numeracy class to improve their skills in order to gain employment, then actually gaining employment is an extremely positive outcome and should be rewarded. Final payment should be made for a successful outcome.

14. How can the reporting and administrative procedures be simplified or made more efficient so trainers can spend more time on training excellence?

Feedback is overwhelmingly negative about the reporting and administrative procedures. They are onerous, unwieldy, time-consuming, inflexible and there are glitches with the technology.

If the professionalism of RTOs was actually recognized (which is part of their RTO status) then much of the current reporting would be unnecessary. If teachers assessed learners who had been appropriately referred by Centrelink, negotiated a learning plan with them and placed them in an accredited course that has been mapped to the NRS, then the course outcomes would replace the need for individual measurement. Learners would complete units or subjects and courses as part of the RTO's regular procedures.

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