



**DEPARTMENT OF IMMIGRATION AND
MULTICULTURAL AND INDIGENOUS AFFAIRS**

Submission

Response to Independent Review of Job Network

May 2002



INTRODUCTION

This submission responds to the draft report *Independent Review of Job Network*, released by the Productivity Commission in March 2002. It addresses a number of draft recommendations and requests for further input from the Commission. Key target groups covered are Indigenous, migrant and refugee job seekers. The Office of Aboriginal and Torres Strait Islander Affairs (OATSIA) within DIMIA has provided specific commentary on Job Network issues relating to Indigenous job seekers.

As the submission deals with two distinct job seeker groups, Part 1 deals with Indigenous Australians and Part 2 deals with migrant and refugee or 'NESB' job seekers as they are referred to by the Commission.

DIMIA broadly supports and welcomes refinements to the Job Network to make programs more flexible and responsive to job seekers' needs. We welcome the opportunity to input to this consultation process and look forward to the Commission's final report later this year.

KEY MESSAGES

Our key messages regarding Indigenous job seekers are:

- The Accessibility and Remoteness Index of Australia (ARIA) would provide a more effective tool for comparing outcomes for Indigenous and non-Indigenous job seekers;
- low commencement rates of Indigenous Australians into Intensive Assistance should be further investigated;
- linkages between Job Network providers and the Indigenous Employment Program (IEP) and the Community Development Employment Projects (CDEP) should be further investigated; and

- we are concerned that the Community Development Employment Projects (CDEP) is counted as an off benefit outcome for Indigenous Australians.

Our key messages regarding NESB job seekers are:

- English proficiency is a key determinant of successful employment outcomes and flexible access to English language tuition should therefore be promoted between relevant agencies and service providers;
- we recommend enhanced links between referral agencies and service providers and the removal of structural barriers and financial disincentives to referring IA clients to English language tuition;
- the treatment of English language programs needs to be differentiated from other education and training programs within the Job Network because of the particular nature of language acquisition;
- greater information provision to job seekers to promote informed choice is welcomed; and
- we recommend further disaggregation of the NESB category for future evaluations of the Job Network.

Part 1

INDIGENOUS AUSTRALIANS IN THE JOB NETWORK

The Office of Aboriginal and Torres Strait Islander Affairs (OATSIA) broadly agrees with the Commission's findings. In particular OATSIA supports recommended changes relating to Intensive Assistance (IA) including:

- reducing the duration of assistance (recommendation 7.3);
- creating scope for job seekers to change their IA provider (recommendation 8.3) as long as the job seeker's relevant personal information can be shared with alternative Job Network providers (recommendation 14.1);
- changes to pricing including recommendations that interim outcome payments for education and training be replaced with higher final payments on completion of a course (recommendation 10.4) and
- splitting primary interim outcome payments into two instalments at 7 and 13 week periods of a job (recommendation 10.5).

OATSIA believes such changes would enhance the ability of Job Network to provide for Indigenous job seekers in terms of increasing the flexibility and appropriateness of IA. This would provide greater incentives for Job Network providers to take on Indigenous clients who are among the most disadvantaged in terms of accessing the job market.

However, OATSIA asks the Commission to note the issues and concerns outlined below.

Comparing Indigenous and non-Indigenous outcomes

Simple national comparisons of Indigenous and non-Indigenous unemployment rates and outcomes from the Job Network can be misleading. The geographic distribution of the Indigenous population is substantially different from the non-Indigenous population. Whereas around 2% of the non-Indigenous population live in remote and very remote locations, 26% of Australia's Indigenous peoples

live in these locations. Similarly, whereas 82% of non-Indigenous Australians live in highly accessible locations, where the most job opportunities exist, only 44% of Indigenous Australians live in these urban centres.

Because employment opportunities are far greater in urban centres than remote localities, simple national comparisons are affected by the different regional distribution of the two populations. To address this problem, DIMIA recommends that all comparisons of Indigenous and non-Indigenous unemployment rates and outcomes from the Job Network should be sliced using categories of remoteness like the Accessibility and Remoteness Index of Australia (ARIA). The Australian Bureau of Statistics (ABS) incorporated ARIA into the Australian Standard Geographic Classification in 2001.

Low commencement rate in Intensive Assistance (IA)

The Commission's report notes the low commencement rate in IA for Indigenous people, even though 90% of Indigenous job seekers were assessed as eligible for IA. OATSIA believes this low commencement rate needs to be further investigated before recommendations amending conditions of IA are made. An understanding of why Indigenous job seekers are not utilising IA is crucial in determining what impacts changing entry into IA from a mandatory to a voluntary basis (recommendation 8.2) will have on Indigenous job seekers and may assist in assessments of appropriate activities to meet mutual obligations.

This investigation should include an evaluation of the effectiveness of the special measures introduced for Job Network providers to better cater for their Indigenous clients. These measures include the contracting of Indigenous Employment specialists and the outlining of specific Indigenous servicing strategies in areas where Indigenous representation is more than 5% on the unemployment register.

Links to other Indigenous initiatives and programs

OATSIA believes that access to assistance for Indigenous job seekers would be improved with stronger connections and linkages between Job Network providers and other employment initiatives such as the Indigenous Employment Program (IEP) and Community Development Employment Projects (CDEP). We understand that the use of IEP services by Job Network providers remains low.

Further investigation into the use by Job Network providers of IEP initiatives such as Wage Assistance needs to occur if Job Network providers are to be able to provide adequate services to Indigenous job seekers. This would include a look at the relationship between Job Network, IEP and CDEP in terms of such things as sharing or aggregating incentive payments between Job Network providers and CDEP organisations and determining any restrictions on these providers in participating in or benefiting from IEP initiatives.

OATSIA is aware that through Indigenous Employment Centres (IECs) Indigenous people will be encouraged into mainstream Job Network services and in particular IA. The aims of introducing IEC's include assisting participants move from work experience (typically undertaken within a CDEP) into paid (and unsubsidised) jobs. However, facilitating effective partnerships between IEC's and Job Network members has been challenging and further investigation and action are required to ensure links are workable and productive. Any suggestions the Productivity Commission could provide in this regard would be welcome.

Community Development Employment Projects (CDEPs)

The draft report notes that employment outcomes are low for Indigenous job seekers, but the off-benefit result is close to average. The report also notes that CDEP is counted as an off-benefit outcome. OATSIA is concerned that defining CDEP as an off-benefit outcome masks problems with many CDEPs. Of particular concern, it may encourage the long-term detachment of Indigenous people from labour markets with good job opportunities in urban and regional centres. It also exacerbates the inability of many CDEP's to facilitate movement into mainstream employment.

OATSIA believes that in determining outcomes and facilitating links between Job Network providers and CDEPs, these issues must be taken into account.

Part 2

MIGRANTS AND REFUGEES IN THE JOB NETWORK

For migrant and refugee or NESB job seekers, finding paid work is both a key indicator and a major determinant of successful settlement. Poor English skills represent a very significant barrier to sustainable employment. Providing migrants and refugees with adequate access to English language tuition is a very prudent government investment in helping people to become self-reliant in the long term.

NESB clients overall constitute a significant proportion (20%) of Job Network clients¹ and make up 21.1% of all Intensive Assistance (IA) clients. They also constitute a strongly disadvantaged group within IA, making up 31.1% of the most disadvantaged participants and 15.5% of participants classified as less disadvantaged.² Part 2 of this submission therefore focuses on proposed refinements to IA that we envisage will benefit these most disadvantaged job seekers.

▪ Language proficiency and employment outcomes

Research consistently demonstrates that English language proficiency is critical to labour force participation and long term success in the labour market. The better the English, the higher the participation rates. A recent analysis of *The Longitudinal Survey of Immigrants to Australia* has found that English language proficiency is a key determinant in finding employment:

The views of migrants about the importance of English skills for getting a job is reinforced by multivariate analysis that predicts the probability of being employed. English language competence is an important predictor of the probability of being

¹Department of Employment, Workplace Relations and Small Business (DEWRSB), 'Job Network: A net impact study', Table A1, April 2001, p. 12

²Ibid, p. 12.

*employed for all visa groups. The effect of less than perfect English is similar for all the visa groups, and reduces the probability of employment substantially.*³

On current figures, an estimated 35% of adult settlers in Australia have a need English language training, while an estimated 87% of refugee and humanitarian entrants require English language training. While skilled stream migrants (ie those targeted for their skills or abilities that will contribute to the Australian economy) have their English language skills assessed as part of their visa application process, English language ability is not a criterion for those who enter Australia under other streams such as family or humanitarian refugee visa sub classes. One of DIMIA's most important settlement services is providing English language programs for these clients.

In the early years of settlement, these job seekers manage a number of competing priorities. While recognising that good English skills are necessary for successful settlement, they typically move in and out of formal English tuition as they juggle other issues of high importance in their lives - care of family, securing a place to live, the need to seek employment, periods of ill health and other issues. Maintaining motivation in the face of the considerable challenge of mastering a new language is also a factor impacting on sustained participation in formal English tuition. Statistics indicate that clients completing the AMEP in 2001 stayed nearly 3 years in the program, with around 2 of these 3 years actually enrolled in classes.

Many of the most disadvantaged NESB job seekers have neither good English language skills nor a strong educational background. Without a great deal of support and provider flexibility as their circumstances and needs change, they will not be in a position to achieve the English language and vocational skills necessary for sustainable employment.

³Sue Richardson, Frances Robertson and Diana Ilsley, 'The Labour Force Experience of New Migrants', National Institute of Labour Studies, Flinders University, Adelaide, August 2001, p. 9.

Combining work or vocational training with targeted English language support or parallel training is an effective way of enhancing motivation to improve English skills. It is therefore desirable that a flexible approach be taken such that these job seekers can participate in part-time English training combined with part time job seeking activities or vocational training.

- **English language training and the Job Network**

We draw the Commission's attention to the interface between the Job Network and DIMIA's Adult Migrant English Program (AMEP) and the Language, Literacy and Numeracy Programme (LLNP) provided by the Department of Education, Science and Training (DEST).

The AMEP provides up to 510 hours of initial English language training to newly arrived migrants and refugees under a legislative entitlement. The Government has a major investment in the infrastructure of the AMEP, providing English tuition to nearly 34,000 clients drawn from 100 language backgrounds at a cost of \$94m in 2000-01.

The LLNP, due to commence in July 2003 under *Australians Working Together*, will provide up to 400 hours of tuition to job seekers assessed as requiring English language and literacy training and as capable of benefiting from it. One of the criteria for access to the LLNP is that eligible AMEP clients have completed their AMEP entitlement.

Job Network policy is strongly focused on employment outcomes but to achieve employment outcomes clients must have sufficient English language skills to undertake Job Network activities. As explained above, for a variety of reasons, including an urgent need to obtain employment, many NESB clients will arrive in Job Network without the necessary English language skills to find work or participate in vocational training at an advanced level (Certificate III or above).

If these clients are to achieve outcomes from their participation in Job Network, services must be provided flexibly to meet their needs. For example they should

have the opportunity to return for a period to English language training, in AMEP or in LLNP if this is considered desirable, or to continue English language study alongside vocational training or job search activities.

- **Structural barriers and financial disincentives for referrals**

Centrelink plays a critical role in the correct referral of NESB job seekers – to the AMEP, LLNP or to Job Network, as incorrect referrals can be greatly to the job seeker's disadvantage. It is crucial that Centrelink be appropriately supported with information on options and the client's needs and goals in making this referral. DIMIA has received reports from AMEP providers that job seekers may be mistakenly referred to Job Network when they are still undertaking, or eligible for, AMEP tuition. Good local working relationships with Centrelink offices, AMEP and Job Network providers can minimise this and facilitate appropriate referrals, but this is dependant on the stakeholders involved.

Once clients are referred to Job Network providers, there are no financial incentives for providers to refer clients to English language tuition, even though improving English language skills may be integral to a tailored plan of assistance.

Further, IA services are based on an intensive case management approach and current policy prevents NESB clients from concurrent participation in IA and the AMEP or LLNP (except in exceptional circumstances). Faced with this structural barrier and the financial disincentive to re-refer, providers may focus on short term or low level employment outcomes or "parking" clients, which has been noted by the Commission.

Recent policy clarification from DEWR in March 2002 now affirms the minimum standard for payments to IA providers for secondary education or training outcomes must be at least Certificate III or Certificate IV level accreditation. With payments limited to these higher level courses, the most disadvantaged NESB job seekers – those with limited education and limited English - may not get the lower

level training they need. These clients effectively have no option but to seek employment with a limited skills base.

DIMIA considers that payment and administrative structures should provide for maximum access to appropriate English language tuition and occupational training for disadvantaged NESB job seekers.

COMMENT ON SPECIFIC RECOMMENDATIONS

Employment outcomes and costs (recommendations 5.1 - 5.3)

DIMIA supports enhanced evaluation of long-term outcomes for job seekers. If these recommendations are adopted, we would be keen to input to the independent panel of researchers proposed to advise on the data needed to evaluate the Job Network.

In particular, we recommend that the NESB category be further disaggregated to more accurately measure access and outcomes for the more disadvantaged NESB job seekers (ie older and unskilled migrants, humanitarian entrants and refugee young people). These groups currently fall within the broad NESB category and they are described more fully in the Appendix.

The NESB category includes recently arrived migrants and refugees as well as job seekers who have lived and worked in Australia for years. It combines some job seekers with a high degree of English proficiency together with many more with limited English language proficiency. One effective method to disaggregate the category is by using English Proficiency groupings (see Appendix).

What services should the Job Network provide? (recommendations 7.1 - 7.7)

▪ Intensive Assistance

DIMIA considers the individualised nature of the IA service to be a real strength for NESB clients. However this also tends to mean that the type of assistance provided and the level and type of training available vary considerably. Recently arrived migrant and refugee job seekers can be particularly vulnerable to poor or inconsistent levels of assistance in their critical early period of settlement.

We note the Australian Council of Social Service's (ACOSS) concerns in its submission that more "coaching" and employment advice rather than truly 'intensive' assistance is offered to job seekers.⁴ While job search training and

⁴Australian Council of Social Services (ACOSS), 'Submission to the Productivity Commission inquiry into the Job Network model', November 2001, p 6.

'coaching' in IA may address some employment barriers, they may not directly address the specific barriers that migrants and refugees can confront and the mismatch between the skills of the most disadvantaged migrant and refugee groups and the needs of prospective employers.

DIMIA agrees that it may be worth referring a selective group of job seekers who have a particular set of obstacles to work to a program outside the Job Network with payments to service providers for overcoming individual obstacles. While the Commission uses the example of literacy in its report, the acquisition of English language skills is a pathway that should also be recognised using the payments incentives proposed.

With a more flexible approach to IA, clients with particular obstacles to work could then be referred to programs that would tackle a set of identified obstacles rather than a job per se. This should include concurrent participation in English language tuition with other Job Network activities.

- **Refinements to Intensive Assistance (IA)**

DIMIA recognises and supports recommendations to make IA more flexible and more truly responsive to the most disadvantaged job seekers' needs. We support shortening the period of IA as proposed and recommend that new portability provisions also provide for enhanced access to language tuition.

DIMIA sees a number of benefits from these refinements. Clients who would benefit from staged or gradual labour force participation and/or language tuition (ie job seekers with refugee or humanitarian backgrounds) would be able to do so under more flexible IA arrangements.

DIMIA notes that ACOSS' other recent report, *The Obligation Is Mutual: New Directions in Employment Assistance in Australia*, recommends that funding systems which recognise intermediate outcomes (such as pre vocational training) as well as employment outcomes may improve long-term results. This has particular relevance to NESB job seekers. We also note ACOSS'

recommendations for greater opportunities for IA clients to obtain vocational training and local work experience.⁵ This is also relevant to newly arrived job seekers, whose overseas qualifications and work experience may not be recognised in Australia. Gaining Australian qualifications and work experience would certainly add value to IA for clients and should also enhance employment outcomes.

DIMIA notes the new arrangements to exit IA clients needing to improve their language or literacy skills by referring them to the Language, Literacy and Numeracy Programme (LLNP), starting from July 2002. These new arrangements will need to incorporate referral back to AMEP, as completion of AMEP is a prerequisite for entry into the LLNP.⁶ Without this option, some migrant and refugee clients will be left without access to an appropriate language tuition program.

Job seeker choices (recommendations 8.1 - 8.4)

▪ Informing NESB job seekers

DIMIA welcomes and strongly supports recommendations to increase information provision and choice for Job Network clients. We recommend that information packages make specific reference to:

- the Adult Migrant English Program;
- the Translating and Interpreting Service (TIS)⁷; and
- specialist IA providers where relevant.

We suggest information about providers be provided in multilingual print format at public access points, supplementing multilingual information available on the Internet. Other appropriate information strategies might be developed in consultation with ethnic community organisations for instance through community

⁵ACOSS, 'The Obligation is Mutual: New Directions in Employment Assistance in Australia', 2002, p. 39.

⁶Current protocols require NESB clients to have acquired functional English, completed 460 hours of AMEP tuition or be outside the period of AMEP entitlement before articulating into the LLNP.

⁷Individual access to translating and interpreting services for clients of Job Network providers are available through the TIS nationally and some State Government funded services.

presentations, using multilingual communicators where necessary. The Commission may also consider how information packages can be provided to job seekers in regional and rural areas through existing State and local government infrastructure points such as Rural Transaction Centres.

- **More informed choice for NESB job seekers**

While large-scale qualitative studies of NESB job seekers' knowledge of the Job Network are not available, reports from community organisations working with job seekers do report lack of information provision and understanding of the Job Network to be a common issue.⁸ NESB job seekers similarly report lack of understanding of the complexities of the Job Network.⁹ Currently NESB job seekers can select referral to a specialist IA provider or they will be automatically referred to a generalist provider via Centrelink's auto-referral system if they do not choose a provider. However not all clients may be aware of the IA NESB 'specialists' throughout Australia.

Without knowledge of the local job market, clients with overseas employment backgrounds may have no basis from which to distinguish one provider from another. Greater information provision about the different Job Network providers and their specialties would benefit these clients. We note that NESB clients are identified as having better outcomes with specialist providers.¹⁰

Targeting (recommendations 9.1 - 9.10)

- **Job Seekers Classification Instrument (JSCI)**

DIMIA supports the continued use of the JSCI and seeks involvement in any JSCI refinements. DIMIA notes the JSCI already acknowledges a number of barriers to employment relevant to NESB job seekers, resulting in a significant number of

⁸Brotherhood of St Lawrence 'Is the Job Network benefiting disadvantaged job seekers? Preliminary evidence from a study of non-profit employment services', January 2001 and Brotherhood of St Lawrence, 'Negotiating The Maze: an analysis of employment assistance for young people', April 2001, p. 30.

⁹Joy Puls, 'Migrants and Refugees and the Job Network: a report on the job network experiences of three WA ethnic communities', South Metropolitan Migrant Resource Centre, June 2001, p. 3.

¹⁰DEWRSB, 'Job Network Member Performance Ratings as at 31 January 2000'.

clients referred to IA. DIMIA is keen to ensure that the JSCI continues to identify these vulnerable clients' barriers to employment.

The Commission's comments that "systems for referral to the Job Network should be culturally sensitive" with regard to Indigenous job seekers apply similarly to this group. Applying the JSCI more flexibly, by allowing more clarifying questions, should certainly be considered for migrant and refugee job seekers attempting to grapple with a second language and different cultural expectations.

We note and concur with the Queensland Multicultural Development Association Inc's comments on the importance of translating and interpreting services for NESB clients as a crucial issue - both to avoid exacerbating clients' lack of understanding of the Job Network system and address providers' lack of cross-cultural awareness.¹¹

- **Redirecting job seekers**

We support recommendation 9.5 to re-direct job seekers to Centrelink for referral to other programs. This would allow the characteristics of re-directed NESB job seekers to be analysed to improve future profiling. This would be particularly useful before clients start in IA.

We recommend that re-direction from IA include a payment for re-referral to the AMEP or to LLNP to give providers incentive to refer those clients who have unused AMEP entitlements and/or whose limited English proficiency hinders them from participation in other more advanced forms of assistance. As the Commission notes in recommendation 9.6, implementing this will require policy direction to encourage providers to re-refer job seekers who are not likely to benefit from IA, whom they may otherwise "park". DIMIA supports exploration of the concept of exit fees or alternative incentive mechanisms to facilitate re-referrals from IA.

¹¹Multicultural Development Association Inc and the Multicultural Employment Advocacy Network (QLD), 'Productivity Commission Job Network Review', December 2001, p. 6.

- **Disclosure**

Disclosure issues may have a particular impact for some NESB job seekers. Communication difficulties and cultural barriers to the kind of self-disclosure the JSCI demands may prevent NESB job seekers from conveying their specific disadvantages. Job seekers with refugee or humanitarian backgrounds may be very reluctant for instance to disclose their experiences of torture and trauma. Job seekers may choose not to disclose the extent of their language needs in the self-assessment process if they believe it will negatively affect their chances of gaining employment.

Flexibility needs to be employed in handling this critical interviewing process on a case by case basis (in private interview spaces as necessary) with appropriate third party support. This issue has also been raised with DIMIA during consultations on refugee young people in the context of determining the full extent of disadvantage these young people experience.

- **Generalist and Specialist Services**

DIMIA supports Job Network providers being able to offer a mix of generalist and specialist services, noting that NESB job seekers have significantly better outcomes when they select specialist providers. It is likely that combining generalist and specialist services such as AMEP tuition (or other language services) would benefit NESB job seekers.

Pricing (recommendations 10.1 - 10.7)

DIMIA recommends that any consideration of pricing structures for English language outcomes take account of the nature of language acquisition. Language acquisition is essentially an incremental process and therefore is different in nature to many skills gained through other training or courses within the Job Network resulting in a qualification, trade or course accreditation on completion. The incremental nature of language acquisition is relevant to the Commission's consideration of a milestone-based program outside of IA - addressing language needs is a key milestone for some NESB job seekers.

Industry dynamics (recommendations 11.1 - 11.7)

- **Star Ratings**

DIMIA agrees that the star ratings model should be retained, that it should be subject to continuing refinement and that more information about the ratings system should be published.

If the star ratings system is maintained, DIMIA is concerned about ascribing a lower weight in the star ratings system to secondary outcomes compared to primary outcomes. This could significantly discourage providers from placing eligible NESB job seekers in training appropriate to their needs. This will impact on cases where the client's fundamental need is to develop further English language and vocational skills.

The roles of the Job Network players (recommendation 14.1)

DIMIA supports moves to promote information sharing between Centrelink, DEWR and Job Network providers. In addition, we believe that these protocols should include the sharing of DIMIA information where relevant.

Centrelink and Job Network providers already seek personal information about NESB job seekers from DIMIA and AMEP service providers. This is done to verify if clients are currently enrolled with the AMEP or whether they meet the requirements for entry into the Program. DIMIA has established procedures to gain client consent for relevant AMEP client information to be made available to Centrelink and other agencies to assist job search activities.

REQUEST FOR FURTHER COMMENT

Service levels

DIMIA supports the concept of guaranteed levels of service or expenditure for job seekers who have their duration of IA extended. Such a guarantee should be able to take account of access to interpreting services, work experience, vocational training, and language/literacy tuition for NESB clients depending on their circumstances. DIMIA recommends that any service level standards developed should comply with the principles outlined in the *Charter of Public Service in Culturally Diverse Society*.¹²

Complaints mechanisms

We note that DEWR reports relatively low levels of complaints from NESB clients currently. However NESB clients do report lower levels of satisfaction with services provided by Centrelink and lower satisfaction with the Job Network than all other equity groups except sole parents.¹³

While lack of understanding about the Job Network also affects their Australian-born counterparts, systemic problems such as incorrect information and referrals can be particularly confusing and disempowering for those with limited English proficiency and this may hinder them from airing grievances.

Newly arrived job seekers may be reluctant to complain about the Job Network and 'risk' securing a job while they have the added pressure of settling in a new country. Culturally appropriate ways to handle complaints can also vary greatly. Job seekers with refugee backgrounds, experiences of torture and trauma or other negative cultural experiences of authority may be strongly inhibited from using customer complaints mechanisms.

DIMIA recommends that community consultations at the local level, including using existing reference groups with ethnic communities be provided to equip

¹²Department of Immigration and Multicultural Affairs, 'Charter of Public Service in a Culturally Diverse Society', 1998.

¹³ DEWRSB, 'Job Network Evaluation', pp. 34-35.

clients with greater information generally. This should include provision of new or existing multilingual information about Job Network providers in Centrelink offices and in providers' offices.

We note that DEWR promoted the Job Network Code of Conduct and complaints processes in information sessions to community groups throughout 2000. We suggest this approach be continued, with targeted sessions to ethnic community organisations, Migrant Resource Centres and community workers supporting migrant and refugee clients.

Targeting

DIMIA supports incentive mechanisms for providers to appropriately re-refer clients and considers that this should include referrals to the AMEP. We see value in a milestone-based program outside of IA for measuring overcoming a variety of barriers to employment, including language or literacy issues.

We support the concept of simultaneous participation between programs and suggest that this include greater links between DIMIA's AMEP and the Job Network. This requires removing structural barriers and financial disincentives as noted previously.

These flexible measures would enhance language acquisition and expand newly arrived migrants and refugees' local work experience and job contacts. It would also benefit NESB job seekers who have lived in Australia for some time, who may have limited English proficiency but prefer to focus on 'looking for work' if they must choose between job search activities and language tuition.

Education and Training

Job Network providers have an important role in linking NESB job seekers to education and training. While some NESB job seekers may have good English proficiency and strong job prospects generally, some may need to access language training as part of their job search strategies.

Good local working relationships between Centrelink, AMEP and Job Network providers, are integral to facilitating client referrals between English language training and job search activities. DIMIA encourages this as part of AMEP contract management activities - AMEP providers are encouraged to make links with local Job Network providers and Job Network providers regularly give presentations on their services to AMEP clients before exiting English classes to look for work.

As already noted, NESB clients should have completed at least 460 hours of their AMEP entitlement or have achieved functional English or no longer have entitlement to the AMEP before Job Network providers refer them to the LLNP. This has been articulated in LLNP contract arrangements in consultation with DIMIA.

Part 3

APPENDIX

Adult Migrant English Program (AMEP)

The Adult Migrant English Program (AMEP) is a national settlement program administered by the Commonwealth. The aim of the program is to help newly arrived migrants and refugees to develop the English language skills they need to settle successfully in Australia, participate effectively in the community and access services available in the general community. The Commonwealth funds AMEP delivery through service providers in all States and Territories.

The Department of Immigration and Multicultural and Indigenous Affairs (DIMIA) administers the program, which is available to adult migrants for whom English is not the first language, and who have been assessed by DIMIA as not having the basic English skills needed to settle satisfactorily in Australia.

The AMEP entitlement is available in the first five years after migrants arrive in Australia or gain permanent residence. Refugee and humanitarian clients who have special needs arising from pre-migration experiences may also take part in a Special Preparatory

Program with up to additional 100 hours of tuition. The AMEP is available to:

- newly-arrived migrants and humanitarian entrants from overseas; and
- people already in Australia who are changing from temporary to permanent resident status who are assessed as not having functional English.

Clients are entitled to 510 hours of tuition, or the number of hours it takes to reach functional English, whichever comes first. In some circumstances, additional tuition may be provided. Clients need to register for their entitlement within three months of arrival or grant of permanent residence, start tuition within one year, and complete tuition within three years. Referrals may be authorised extending the possible period of tuition to up to five years.

In 2000-01 nearly 34,000 clients drawn from 100 language backgrounds were assisted by the AMEP; a total of 6.5 million hours of adult ESL tuition were provided at a cost of \$94m. The program budget in the current year is \$103.9 million. \$17.7m was allocated to the AMEP in the 1996-97 Budget to fund, over a period of four years, special preparatory programs for humanitarian entrants and to enhance the Home Tutor Scheme. Further funding has been allocated to extend this provision for an additional two years up to 2002-03.

The Immigration (Education) Act 1971 provides the legislative basis for the provision of English tuition for AMEP clients. Migrants may be tested offshore or onshore through the International English Language Testing System or another accepted testing regime, or assessed in Australia by an AMEP Service Provider. Those assessed as not having a functional level of English have an entitlement to 510 hours of tuition or the number of hours it takes to reach functional English, whichever comes first. "Functional English" is defined as level 2 on the International Second Language Proficiency Rating (ISLPR) scale, or completion of Stage 3 of the Certificates in Spoken and Written English (CSWE).

AMEP uses the CSWE competency framework. CSWE recognises different learning paces based on such learner characteristics as entry proficiency, years of formal schooling, age, and use of roman or non-roman script. CSWE Stage 3 allows for students to choose a focus for their learning, depending on their goals: employment, further study or community participation. Translation statements, which allow CSWE outcomes to be reported under the National Reporting System (NRS), have been developed to report learning outcomes. Tuition options under the AMEP currently include formal tuition (classroom and distance learning) and the Home Tutor Scheme.

The management of clients is tracked by service providers and by DIMIA through the AMEP Reporting Management System (ARMS). Service providers are independently accredited through the national ELT Accreditation Scheme

(NEAS). Research and development is supported by the AMEP Research Centre.

Data alternatives to the NESB Category

The NESB category is used by many agencies to measure cultural diversity but it does not always accurately measure degrees of disadvantage or need. In fact, the Australian Bureau of Statistics (ABS) has noted that NESB is an oversimplified indicator of disadvantage that may result in inappropriate service provision as:

- the term has a number of conflicting definitions;
- it groups people who are relatively disadvantaged with those who are not disadvantaged; and
- it is unable to separately identify the cultural and linguistic groups in Australian society.¹⁴

The ABS has developed a minimum core set of indicators that it considers necessary for replacing the NESB category:

- country of birth;
- main language other than English spoken at home;
- proficiency in spoken English;
- Indigenous status, for collections not specifically focused on migrants to Australia.

The full standard set of indicators includes ancestry, country of birth of father, country of birth of mother, first language spoken, languages spoken at home, religious affiliation and year of arrival in Australia.¹⁵

¹⁴Australian Bureau of Statistics, 'Standards for Statistics on Cultural and Linguistic Diversity', Category 1289.0, November 1999, p. 3.

¹⁵*Ibid.*, p. 5.

English Proficiency Groupings

English Proficiency (EP) Groups are classifications developed by the Bureau of Immigration, Multicultural and Population Research (BIMPR) for data collection on clients by agencies. Both DIMIA and the ABS use this methodology.

EP Group 1 is the equivalent of the former Main English Speaking countries and comprises people born in Canada, Ireland, New Zealand, South Africa, the UK and the USA. This grouping has been found to be a statistically and analytically robust categorisation based on large immigrant populations (in excess of 10,000 people) which are characterised by very high levels of EP (98% or more of recent immigrants speak English only or another language and good English). The remaining three EP Groups are divided according to the EP levels of recent migrants from each country of origin.

EP Group 2 comprises those countries with a rating of 80% or higher on the EP index (ie 80% or more of recent arrivals speak English only or another language and good English). Included in EP Group 2 are, people from Malta, the former USSR, the former Czechoslovakia, Austria, Germany, the Netherlands, the Philippines, India and Sri Lanka, amongst others.

EP Group 3 comprises those countries with a rating of at least 50% but less than 80% on the EP index. This includes countries such as Greece, Italy, the former Yugoslav republics, the Ukraine, Hungary, Poland, Cyprus, Lebanon, and Egypt.

EP Group 4 comprises those countries with a rating below 50% on the EP index, including Turkey, Vietnam and China (excluding Taiwan).

Labour market barriers for particularly disadvantaged migrants

Older and unskilled migrants from English Proficiency (EP) groups 3 and 4 are experiencing high rates of welfare dependency. According to 1996 Census data, at least one in every three men aged 45-64 years from Greece and the former Yugoslavia are receiving welfare assistance. Much of the work they previously performed has been automated and the products of the industries that employed them are now imported. They are at a high risk of permanent welfare dependency. Female dependency rates for these groups are even higher.¹⁶

Humanitarian entrants have not been selected on the basis of their work skills or English proficiency. Some have come from developing countries where exposure to urban society and opportunities to develop work skills have been limited. There can be a high convergence of factors recognised as barriers to employment, such as low levels of education, literacy, English proficiency and work skills. They may have had experiences of torture or trauma and suffer from poor physical and mental health. The circumstances in which they have departed from their home countries often lead to immediate disadvantages in job seeking, such as limited financial resources and lack of personal documentation required for police clearances.¹⁷ Some humanitarian entrants face additional disadvantages. For example, women arriving under DIMIA's 'Women at Risk' Refugee Program are often sole parents without family members in Australia to assist them.

Refugee young people share in the barriers experienced by other humanitarian entrants. Issues such as malnutrition and emotional trauma during their physical and mental development and severely disrupted schooling may have compounded these disadvantages. Refugee young people may experience a negative impact from issues of cultural conflict and identity formation and the competing expectations of family and wider society. These factors are occurring

¹⁶Bob Birrell and James Jupp, 'Welfare Recipient Patterns Among Migrants', Centre for Population and Urban Research, Monash University and Centre for Immigration and Multicultural Studies, Australian National University, July 2000, Centre for pp. 26-27.

¹⁷Joy Puls, 'Migrants and Refugees and the Job Network: a report on the job network experiences of three WA ethnic communities', South Metropolitan Migrant Resource Centre, June 2001, p. 3.

when they are entering a particularly competitive and performance oriented phase of their lives.¹⁸

Rural and Regional Australia

Barriers to labour market participation can be compounded by disadvantages common to all job seekers in regional, rural and remote areas. These disadvantages include fewer job opportunities, higher long-term unemployment and the impact of a declining population, lack of infrastructure, isolation and telecommunications difficulties on provision of government services. Factors such as limited English and cultural differences can exacerbate physical and social isolation and difficulties accessing government services.¹⁹

As the NESB category stands, these sub groups cannot be more clearly identified in Job Network evaluations. Youth and job seekers in remote and regional areas have been generally acknowledged within Job Network evaluations as more disadvantaged groups.

¹⁸ Refugee Resettlement Advisory Council, 'Strategy for Refugee Young People', April 2001, pp. 9-10.

¹⁹ Department of Immigration and Multicultural and Indigenous Affairs, 'Supporting Settlement in rural, regional and remote areas, April 2002, p 51.