



AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

Submission to

**AUSTRALIAN UNIVERSITIES ACCORD
DISCUSSION PAPER**

April 2023

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List of Recommendations

ACTA recommends that:

1. The Accord require higher education provider mission statements and accompanying medium and long-term plans (adjusted over a three to four-year cycle) to include explicit listings of award programs and their constituent units, and supplementary support and research that addresses and strengthens cultural and linguistic diversity in Australia. These plans should respond to the various contexts and communities served by different higher education institutions.
2. As a first and necessary step, the Accord contain provisions that require production of data on (i) the numbers of Indigenous, migrant and refugee, and international student speakers of English as an additional language or dialect in higher education, accompanied by descriptions of the methodology used to determine these numbers, and the provision in place to meet their learning needs, and (ii) the Indigenous and migrant and refugee populations served by these institutions.
3. To ensure that the benefits of higher education are shared by all Australians irrespective of background, the Accord acknowledge the pivotal role of English language learning for some groups that are underrepresented in higher education.
4. The Accord include clear and explicit remedies that address the problems that attach to the reliance of higher education on income from international students, and the incentives that promote or obscure the exploitation of these students.
5. The Accord include explicit remedies that address the loss of specific expertise and capacity in higher education institutions in the areas of TESOL teaching, bilingual education, and languages other than English.
6. The Accord include explicit reform strategies that ensure higher education institutions support and report on necessary skill development and credentialling for all teachers working in culturally and linguistically diverse early childhood, school and adult education settings, including specialist teachers in the areas of TESOL and LOTE teaching and bilingual education.
7. In pursuance of its access and equity and quality teaching and learning objectives, the Accord require that higher education institutions ensure provision of Academic Language and Learning support for students identified as needing this support and report on provision type, student numbers and how they are identified for support.

1. Introduction

This submission is made on behalf of the Australian Council of TESOL Associations (ACTA). ACTA is the peak professional body for TESOL (Teaching English to Speakers of Other Languages) educators in pre-school, school and adult settings. It comprises representatives from state and territory TESOL associations, whose members include teachers, consultants and curriculum developers and researchers in the field of English as an Additional Language or Dialect (EAL/D).

ACTA's mission is to advocate for the educational interests of students who are learning English as their second or additional language in all sectors (Early Childhood Education, schools, adult, community and tertiary education) and for those who teach them in specialist and mainstream classrooms. Our advocacy depends entirely on the work of volunteers.

In line with this mission and in regard to the Australian Universities Accord (henceforth the Accord), ACTA is specifically concerned with how Australian higher education responds to the following national needs:

1. Providing the fundamental knowledge, skills and dispositions to support the **teacher workforce** that is directed to:
 - a. **meeting the needs of learners** of English as an additional language or dialect in Early Childhood Education, schools, the adult sector (notably, the Adult Migrant English Program, the wider VET sector and community education)
 - b. fostering and developing Australia's knowledge and skills base **in languages other than English (LOTE)**, including Indigenous languages (see the Closing the Gap Agreement Outcome 16).¹
2. **Supporting learners of English as an additional language or dialect (EAL/D) in tertiary education programs** to achieve at the highest levels. These learners include:
 - a. Aboriginal and Torres Strait Islander EAL/D learners, especially from remote and regional areas
 - b. relatively recently arrived migrant and refugee learners
 - c. Australian-born and Australian-educated migrant and refugee-background students who are under-prepared for tertiary studies
 - d. international students.

ACTA recognises that the Discussion Paper is directed a high and generic level of policy formation and is constrained in its consideration of specific areas of tertiary education provision. However, we are deeply disappointed with its total silence on language and language-related issues. In regard to challenges and opportunities for Australia and the

¹ **Outcome 16:** Aboriginal and Torres Strait Islander cultures and languages are strong, supported and flourishing. [National Agreement on Closing the Gap | Closing the Gap](#)

higher education sector, it might reasonably be expected that these issues would be acknowledged in relation to Australia's population and community structure, advancing equity, international engagement, universities' reliance on income from international students, and the needs of industries, including the provision of teachers. Instead, we find formulaic references to "knowledges and culture" and "culturally inclusive approaches" that seem to relate only to First Nations people (p. 9) and therefore reflect an underlying tokenism. The Discussion Paper does nothing to advance an Accord that, in regard to language-related issues, aims to "increase equity of opportunity, meet future skills needs and deliver high quality research that is useful to communities, industry and governments" (p. 5). We believe we are justified in characterising the Discussion Paper as reflecting a monolingual English mindset.

The flow-on effects of this mindset (which regrettably pervades current mainstream policy documents)² will be the disappearance of support for languages and language education at each more specific policy level. That is, the already drastic decline and abandonment of tertiary provision will further accelerate in:

- (i) **core subjects and research** that support the teaching of English and other languages (for example, languages other than English, Linguistics and Applied Linguistics)
- (ii) **initial teacher education subjects and advanced degrees** that have previously equipped specialist EAL/D and LOTE teachers
- (iii) **Study Skills and English language support** for Australian-born/educated and international students.

A micro-reflection of this decline and lack of support is ACTA's lack of capacity to provide detailed evidence to support our very real concerns about items (i) – (iii) above, given both limits on our human resources and the time allowed for responses to the Discussion Paper. We direct your attention to the multiple submissions we have made to various reviews in the recent past and initiatives we have taken in contributing to policy discussions.³

² For example:

[Study report - Review of the National School Reform Agreement \(pc.gov.au\)](#)

[Draft National Teacher Workforce Action Plan \(tesol.org.au\)](#)

[Next Steps: Report of the Quality Initial Teacher Education Review - Department of Education, Australian Government Review of the Melbourne Declaration \(education.sa.gov.au\)](#)

³ [Submission DR124 - Australian Council of TESOL Associations \(ACTA\) - National School Reform Agreement - Commissioned study \(pc.gov.au\)](#)

[ACTA-Submission-to-Productivity-Commission-Review-of-National-School-Reform-Agreement.pdf \(tesol.org.au\)](#)

[Roadmap-for-English-as-an-additional-language-or-dialect-in-schools-ACTA-May-2022.pdf \(tesol.org.au\)](#)

[ACTA-final-submission-Quality-Initial-Teacher-Education-Review.pdf \(tesol.org.au\)](#)

[ACTA-submission-National-Teacher-Workforce-Action-Plan-final.pdf \(tesol.org.au\)](#)

[Action-Plan-for-the-Adult-Migrant-English-Program.pdf \(tesol.org.au\)](#)

ACTA Submission to The House Standing Committee on Employment, Education and Training Inquiry into Adult Literacy and its Importance (Submission 85 at [Submissions – Parliament of Australia \(aph.gov.au\)](#))

[ACTA-ECE-Principles.pdf \(tesol.org.au\)](#)

[Submission 11 - Australian Council of TESOL Associations \(ACTA\) - Closing the Gap Review - Commissioned study \(pc.gov.au\)](#)

This submission will begin by addressing issues raised in the first two sections of the Discussion Paper and then focus specifically on questions that relate to (i) equipping the teacher workforce to respond to the needs of speakers of English as an additional language or dialect, and (ii) improving EAL/D learners' access to higher education.

2. The nature and purpose of Australian higher education

Q1 How should an Accord be structured and focused to meet the challenges facing Australia's higher education system? What is needed to overcome limitations in the current approach to Australian higher education?

Q2 How can the diverse missions of Australian higher education providers be supported, taking into account their different operating contexts and communities they serve (for example regional universities)?

Australia's higher education providers play a critical role in teaching and research that would enable effective responses to Australia's long-standing and increasing cultural and linguistic diversity. The Accord needs to acknowledge this reality and prioritise it as an imperative in the national interest in skills and industry development, the community, industry and business engagement, equity of access and opportunity, solving complex societal problems, and innovation.

Recommendation 1

ACTA recommends that the Accord require higher education provider mission statements and accompanying medium and long-term plans (adjusted over a three to four-year cycle) to include explicit listings of award programs and their constituent units, and supplementary support and research that addresses and strengthens cultural and linguistic diversity in Australia. These plans should respond to the various contexts and communities served by different higher education institutions.

3. Challenges and opportunities for Australia

In this section, we comment on key omissions in section 2 of the Discussion Paper. Our answers to relevant Discussion Paper questions are in later sections.

3.1 Population and community structure (DP section 2.1)

The Discussion Paper provides no data on learners of English as an additional language or dialect in higher education. This absence reflects the overall paucity of such data for the Australian education system, which facilitates the policy silence in this space.

Below we outline the fragmented and incomplete demographic picture that ACTA can deduce regarding First Nations, migrant and refugee, and international student English language learners.

Indigenous EAL/D learners

For a significant number of Aboriginal and Torres Strait Islander people, English is an additional language or dialect. The 2021 census records that 9.5 per cent (77,000) of those identifying as Aboriginal and Torres Strait Islanders use an Aboriginal or Torres Strait Islander language at home.⁴ The majority of these speakers live in remote areas. In 2016, the Productivity Commission reported that 61.5 per cent of Indigenous people living in very remote areas spoke an Indigenous language at home.⁵ Using 2016 Census data, the Commission's 2020 Report on Indigenous Disadvantage states that 11 per cent of Indigenous language speakers said they did not speak English well or at all. This ranged from about 3-4 per cent in major cities and inner regional areas to 13 per cent in very remote areas.⁶

The number of these students in schools is not reported nationally. Based on 2016 ABS Census data, ACTA has estimated this figure as 27,329.⁷ To our knowledge, no data exists on speakers of Indigenous languages in post-school, community or adult education.

Migrant and refugee EAL/D learners

Immigration is a major driver of Australia's population growth⁸ while international crises will continue to put pressure on Australia's refugee and humanitarian intakes.⁹ Net overseas migration to Australia rose from 232,800 in 2006/7 to 262,490 in 2016/17, an increase of 12.7 per cent, while the overseas born population grew from 4,063,954 in 2001 to 6,150,051 in 2016, an increase of 151 per cent.¹⁰ Current government immigration policy is dramatically increasing these numbers.

In schools, ACTA has estimated that over 600,000 speakers of languages other than English currently need English language support.¹¹ ABS Census data indicate the number of school-aged respondents (0-19 years of age) who reported speaking 'not well' or 'not

⁴ The most common language groups were: Other Australian Indigenous Languages (31.3%), Arnhem Land and Daly River Region languages (14.5%), Torres Strait Island languages (12.0%), Western Desert Languages (10.9%). Other languages used were: Yolngu Matha (8.5%), Arandic (7.4%), Cape York Peninsula Languages (7.0%), Northern Desert Fringe Area Languages (6.6%), Kimberley Area Languages (1.8%). [Australia: Aboriginal and Torres Strait Islander population summary | Australian Bureau of Statistics \(abs.gov.au\)](#)

⁵ [Overcoming Indigenous Disadvantage: Key Indicators 2016 - Report \(pc.gov.au\)](#) p. A.24

⁶ [Overcoming Indigenous Disadvantage: Key Indicators 2020 - Report \(pc.gov.au\)](#). p. A 5.

⁷ The National Indigenous Australians Agency (NIAA) submission to the 2020 Parliamentary Inquiry into Education in Remote and Complex Environments stated:

a significant proportion of Aboriginal and Torres Strait Islander students in remote schools are English as an Additional Language or Dialect (EAL/D) learners: In 2014-15, around one-third (34 per cent) of Aboriginal and Torres Strait Islander children aged 4-14 years spoke an Australian Indigenous language (including those who only spoke some words). This increases to two-thirds (66 per cent) in remote, compared with 26 per cent in non-remote areas.

⁸ Cully, M. & Pejoski, L. (2012) Australia unbound? Migration, openness and population futures. In *A Greater Australia: Population, policies and governance* Committee for Economic Development. p.70.

⁹ For example, Commonwealth Government's recent decision to accept an additional intake of Syrian refugee families and to increase the number of humanitarian places from 13,500 to 20,000.

¹⁰ https://parlinfo.aph.gov.au/parlInfo/download/library/prspub/6377182/upload_binary/6377182.pdf

¹¹ <https://tesol.org.au/how-many-english-as-an-additional-language-or-dialect-eal-d-learners-are-there-in-australian-schools/>

at all' increased from 117,158 in 2006 to 190,462 in 2016, an increase of 62 per cent.¹² These students include:

- newly arrived students entering Australian schooling at any year from Kindergarten to Year 12
- Australian-born students in all years of schooling learning at different levels of English language proficiency
- humanitarian entrants and asylum seekers with little or no previous formal schooling
- migrant and international students with age-equivalent education
- Kriol and Dialect speaking Indigenous students with varying degrees of exposure to Standard English.¹³

Little data exists on adult immigrant English language learners. The Adult Migrant English Program reported 1,860 referrals to it in 2022.¹⁴ The 2011-2012 PIAAC survey found that almost three million Australians lack basic literacy or numeracy skills or both but these data are not disaggregated to distinguish mother tongue English speakers from EAL/D learners.¹⁵

School aged international students

By 2018, prior to the COVID-19 pandemic, enrolments of international fee-paying students in Government, Catholic and Independent schools in Australia had grown to a total of 243,887. Of these, 128,998 were primary enrolments and 114,889 were secondary. Government school enrolments were 182,956 students or 75 per cent of the total.¹⁶ As Australia's borders reopen and state and territory systems and government and independent schools resume their international student programs, it is likely that international student enrolments will return to levels similar to those before the pandemic.

Clearly, the data on Indigenous, migrant and refugee background and international student learners of English as an additional language or dialect lack precision and coverage. Without these data, advocacy for change has little traction: the lack of data clearly supports a consistent silence regarding English language learners in current policy-making for almost every domain, including higher education.

¹² ABS Censuses 2006, 2016

¹³ The great majority of EAL/D learners are enrolled in state and territory government schools. In 2018-19, they comprised some 13,576 new arrivals, 334,389 EAL/D learners in mainstream classrooms, an estimated 27,329 Indigenous EAL/D learners, and 185,322 international students, totalling 560,616 EAL/D learners altogether. In the Catholic education sector, there were over 14,066 EAL/D learners in the mainstream, and 40,430 international students. Altogether, there were 601,046 EAL/D learners in Australian schools comprising some 15.4 per cent of the total student population. <https://tesol.org.au/how-many-english-as-an-additional-language-or-dialect-eal-d-learners-are-there-in-australian-schools/>

¹⁴ Australian Government, Jobs & Skills Australia *JSA Foundation Skills Study: Discussion Paper*, April 2023. [Foundation Skills Discussion Paper | Jobs and Skills Australia](#)

¹⁵ PIAAC = Programme for the International Assessment of Adult Competencies. OECD, 2017. Building skills for all Australia, Based on PIAAC survey results from 2011-12. (

¹⁶ Answer to Senate Estimates Question on Notice SQ19-130.

Recommendation 2

ACTA recommends that, as a first and necessary step, the Accord contain provisions that require production of data on (i) the numbers of Indigenous, migrant and refugee, and international student speakers of English as an additional language or dialect in higher education, accompanied by descriptions of the methodology used to determine these numbers, and the provision in place to meet their learning needs, and (ii) the Indigenous and migrant and refugee populations served by these institutions.

3.2 Equality, participation and democracy (DP section 2.3)

ACTA supports the Discussion Paper's aspiration "to ensure that the benefits of higher education are shared by all Australians, regardless of their background" (p. 10). We agree that it is fundamental to Australia's national agenda to strengthen "the place of First Nations people, knowledges and culture in Australia's national life, and reducing the inequalities and marginalisation that reduce the wellbeing and opportunity of First Nations Australians" (p. 9).

However, we note the Paper's failure to include reference to:

- First Nations **languages** – for reasons we have outlined at length in previous submissions we find this omission implies an acknowledgement of "knowledges and cultures" that is tokenistic and lacks substance and force¹⁷
- **the languages and cultures of the immigrant population in Australia** and the assumption that some portions of this population (for example, those from refugee backgrounds) are not also under-represented in higher education (p. 10) The absence of reference to this population persists in every relevant section of the Discussion Paper (e.g. sections 3.3.2 and 3.5).

Recommendation 3

ACTA recommends that, to ensure that the benefits of higher education are shared by all Australians irrespective of background, the Accord acknowledge the pivotal role of English language learning for some groups that are underrepresented in higher education.

¹⁷ [Submission 87 - Australian Council of TESOL Associations \(ACTA\) - Indigenous Evaluation Strategy - Project \(pc.gov.au\)](#)
[Submission 11 - Australian Council of TESOL Associations \(ACTA\) - Closing the Gap Review - Commissioned study \(pc.gov.au\)](#)

3.3 International engagement, global security and geopolitical competition (DP section 2.4)

We note the lack of reference to:

- (i) **the role of languages other than English** in the aspiration to “elevate our broader engagement, developing personal networks in neighbouring countries” (p. 10).
- (ii) **the English language, Study Skills and emotional support** required by a large majority of the “hundred and thousands of international students” studying with Australian providers (p. 10).¹⁸

ACTA disputes the assumption that the presence of international students in Australian universities automatically promotes Australia’s good standing in their home countries. The first-hand experience of our members points to serious problems with many international students experiencing loneliness, ghettoization, exploitation in work settings, excessive pressures to perform, racism and alienation.

Recommendation 4

ACTA recommends that the Accord include clear and explicit remedies that address the problems that attach to the reliance of higher education on income from international students, and the incentives that promote or obscure the exploitation of these students.

3.4 Economic transformation, changing jobs, industries and capabilities (DP section 2.6)

As has been identified in other reports, Australia has an acute shortage of teachers.¹⁹ However, as also characterises this Discussion Paper, reports dealing with the teacher shortage fail to address the almost total decline in specialist EAL/D and LOTE teachers in schools, and both the fundamental and pedagogically related knowledge and skills these teachers require.

Further, no consideration is given in the Discussion Paper to the escalating **loss of expertise** needed to provide higher education staff and students with the required knowledge and skill development regarding language learning and language education. Further, the system-wide casualisation and short-term contracting of higher education staff has severely impacted teacher education programs overall, including TESOL programs. Where Australia once led the world in approaches to teaching English and bilingual education, the closure of languages departments and specialist teacher

¹⁸ As a condition of enrolment, international students must meet minimum English language proficiency requirements. ACTA is acutely aware that it is not uncommon for many students to be found on arrival to have insufficient English for learning in both Australian higher education and schools (particularly the senior school curriculum). 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, as do also tertiary institutions who rely on income from recruiting these students.

¹⁹ [Study report - Review of the National School Reform Agreement \(pc.gov.au\)](#)
[Draft National Teacher Workforce Action Plan \(tesol.org.au\)](#)
[Next Steps: Report of the Quality Initial Teacher Education Review - Department of Education, Australian Government](#)

education programs has gravely undermined teacher skill development and research capability in this area. We have effectively lost the capacity to produce a new generation of researchers, innovators and leaders in the disciplines and content areas that support language(s) education.

Recommendation 5

ACTA recommends that the Accord include explicit remedies that address the loss of specific expertise and capacity in higher education institutions in the areas of TESOL teaching, bilingual education and languages other than English.

4. Meeting skills needs through higher education: the teaching workforce

In this section, we bring together our answers to questions on the role of higher education provision in delivering a teacher workforce capable of responding to the demographic picture outlined above in section 3.1.

Q4 Looking from now to 2030 and 2040, what major national challenges and opportunities should Australian higher education be focused on meeting?

Q8 What reforms are needed to promote a quality learning environment and to ensure graduates are entering the labour market with the skills and knowledge they need?

Q9 How should Australia ensure enough students are studying courses that align with the changing needs of the economy and society?

Q11 How should Australia boost demand from people to study in the higher education system?

Q13 How could an Accord support cooperation between providers, accreditation bodies, government and industry to ensure graduates have relevant skills for the workforce?

Q14 How should placement arrangements and work-integrated learning in higher education change in the decades ahead?

Q28 What is needed to increase the number of people from under-represented groups applying to and prepared for higher education, both from school and from other pathways?

Q30 How can governments, institutions and employers assist students, widen opportunities and remove barriers to higher education?

The higher education sector plays a vital role in ensuring the provision of skilled and knowledgeable teachers, both directly in teacher education programs but equally importantly in the content of academic degrees that underpin teaching qualifications.

Knowledgeable and skilled school and Early Childhood Education teachers are probably the most significant contributors to enabling under-represented groups to access higher education.²⁰ Where young people have received quality schooling prior to entering higher education, catch-up support is unnecessary. To the extent that Australian schools have

²⁰ The life-time benefits of quality Early Childhood education are now well-recognised.

failed their students, this support is unfortunately required. Ideally, it should be required only for those entering higher education with little or no schooling in Australia (or its equivalent), i.e. relatively recently arrived migrants and refugees, and international students. It follows that quality teacher education programs play a vital long-term role in promoting access for currently under-represented groups.

Despite their importance, teacher education programs are far from centre-stage in higher education policy-making. Policy for initial teacher education is currently being separately developed from policy-making towards the Universities Accord with the danger that the former is siloed. Moreover, neither policy domain is addressing issues related to languages, language education and provision for those for whom English is an additional language or dialect, be they Indigenous or from migrant and refugee backgrounds. ACTA is concerned that the monolingual English mindset currently in play will have grave implications for Australian education into the future.

Currently, a vicious cycle exists in regard to the provision and employment of both EAL/D and LOTE teachers in schools. There is no demand for qualified EAL/D and LOTE teachers because employers do not seek to employ these teachers. The reasons they give for not seeking these teachers is that they cannot be found. This vicious cycle in EAL/D provision is supported by the lack of a national policy framework for EAL/D teacher standards or accreditation.²¹

This policy silence persists, despite the demographic data outlined in section 3.1 above and the fact that, now and for the foreseeable future, no primary or secondary graduate teacher can expect to teach in an Australian classroom that does not include some and often many students with EAL/D learning needs.

Some of the consequences of this policy silence are as follows.

- Even minimal teacher education offerings that equip teachers to respond to EAL/D learning needs are rare.²²
- Prior to the pandemic, higher education providers had almost entirely reoriented their specialist TESOL courses to meet the demand from international English language teachers, resulting in the disappearance of content and teaching practica appropriate to learning English in Australian schools and the adult sector. The loss

²¹ AITSL's *Australian Professional Standards for Teachers* do not identify the specific knowledge and skills required for teaching EAL/D learners by specialist or non-specialist teachers.

²² Eight tertiary institutions in Australia offer elective *units* (not programs) for specialist EAL/D teaching in their ITE programs, and only two offer both elective and mandatory core EAL/D units for specialist and non-specialist teachers respectively. Many ITE providers offer student literacy and diversity/inclusivity units which have been found to be generalised, tokenistic and devoid of EAL/D or curriculum language content. The needs of learners of Standard Australian English as an additional dialect/variety (for example, in the Torres Strait or for Pacifica students) are never addressed. See Appendix B in ACTA Submission to the Quality Initial Teacher Education review at <https://tesol.org.au/wp-content/uploads/2019/01/ACTA-final-submission-Quality-Initial-Teacher-Education-Review.pdf>

of international students has led to the complete closure of most specialist TESOL courses.²³

- **No** preservice and in-service education opportunities exist for Early Childhood Education teachers to gain qualifications in languages or recognition of prior languages skills.²⁴
- The Australian school and higher education teaching force remains predominantly monolingual in English and does not reflect the linguistic diversity in wider society.²⁵
- The fallacy (also evident in the Discussion Paper) persists that learning English as an additional language or dialect is the same as learning literacy.²⁶

A further problem is that the uncapping of university student places has resulted in elite universities increasing their student numbers, while undermining enrolments in other universities that previously offered quality niche programs, including in languages and teacher education to meet specific learning needs. Thus, teacher education programs in regions with a high demand for specialist EAL/D teachers have been unable to sustain TESOL courses.

The end result is that Australian higher education is currently producing graduates in the teaching profession who are fundamentally ill-equipped to teach in linguistically diverse Australian classrooms in schools and the adult sector.

Answers to the Discussion Paper questions above can be summarised as follows. Providers, accreditation bodies (both ASQA and teacher registration boards) and employers (i.e. State/Territory education departments and school principals) must be brought together to ensure, first, **a demand** for qualified EAL/D and LOTE specialist teachers and, second, agreement on the general outlines of **required content** of such

²³ ACTA QITE Review submission, pp. 12-13

²⁴ We can find no evidence of language specialisation or accreditation in any Certificate, Diploma, Bachelor or Masters level programs in Early Childhood; no evidence of accreditation of teachers' bilingual skills in the ECE workplace; no evidence of English language teaching methodology programs for the Early Childhood sector.

²⁵ There is evidence that the percentage of teachers from language backgrounds other than English is half that of the school student population. Cruickshank, K., Ellesmore, M. & Brownlee, P. (2018). Skills in Question, SICLE: Sydney University.

This lack of diversity has been a key focus of policy in North America and Europe but has not figured in Australia reports. Schroth S.T., Helfer J.A. (2018). Lack of Diversity in the American Teaching Force. In: Developing Teacher Diversity in Early Childhood and Elementary Education. Palgrave Macmillan, New York.
https://doi.org/10.1057/978-1-137-59180-7_1

There are an estimated 7,000 teachers with overseas training in Australia unable to gain re-entry to the profession
Cruickshank, K., Ellesmore, M. & Brownlee, P. (2018). Skills in Question, SICLE: Sydney University.

Many international students come with an interest in and often previous experience of teaching EAL as a foreign language. Graduates interested in staying in Australia on a permanent or short-term basis could be offered transition and orientation courses that pathway into teaching EAL/D in Australian schools.

²⁶ ACTA has repeatedly documented the impact of this fallacy on provision for Indigenous, migrant and refugee students in the school system. For example:

ACTA Submission to The House Standing Committee on Employment, Education and Training Inquiry into Adult Literacy and its Importance (Submission 85 at [Submissions - Parliament of Australia \(aph.gov.au\)](https://www.aph.gov.au)).

For ACTA submissions on NAPLAN's conflation of learning English with learning literacy, go to: [Advocacy - Australian Council of TESOL Associations](#).

qualifications.²⁷ More broadly, teacher workforce planning by government is required. This should include attention to specific teaching areas.²⁸

Recommendation 6

ACTA recommends that the Accord include explicit reform strategies that ensure higher education institutions support and report on necessary skill development and credentialling for all teachers working in culturally and linguistically diverse early childhood, school and adult education settings, including specialist teachers in the areas of TESOL and LOTE teaching and bilingual education.

5. Improving EAL/D learners' access to higher education

In this section, we provide responses to the Discussion Paper questions that relate to improving direct access to higher education for learners of English as an additional language or dialect. We repeat some questions listed above in section 4, this time as they relate to access.

Q11 How should Australia boost demand from people to study in the higher education system?

Q17 How should better alignment and connection across Australia's tertiary education system be achieved?

Q20 How can pathways between VET and higher education be improved, and how can students be helped to navigate these pathways?

Q28 What is needed to increase the number of people from under-represented groups applying to and prepared for higher education, both from school and from other pathways?

Q29 What changes in provider practices and offerings are necessary to ensure all potential students can succeed in their chosen area of study?

Q34 How should the contribution of higher education providers to community engagement be encouraged and promoted?

Q39 What reforms are needed to ensure that all students have a quality student experience?

Q42 What settings are needed to ensure academic integrity, and how can new technologies and innovative assessment practices be leveraged to improve academic integrity?

²⁷ Broadly speaking, the required course content consists of:

1. Knowledge about and competence in the language to be taught (English/LOTE): its phonology, morphology, syntax, discourse structures and pragmatics.
2. Knowledge about how languages, and literacy in those languages, are learned and can be taught.
3. Knowledge about the social contexts of language use and language learning, and the implications for learning and teaching.
4. Knowledge and skills in developing language learning curriculum, resources and assessment, and the development of teaching and assessment strategies.
5. Practical experience in teaching languages in different pedagogic contexts (e.g. in schools and with adults).

Since the 1970s, these content areas have developed into distinct disciplinary areas of teaching and research at undergraduate and postgraduate levels.

²⁸ See ACTA's submission to the draft National Teacher Workforce Action Plan at: <https://tesol.org.au/wp-content/uploads/2019/01/ACTA-submission-National-Teacher-Workforce-Action-Plan-final.pdf>

In regard to boosting direct demand for study in the higher education system, the system needs to maintain and strengthen pathways that are alternatives to Year 12 certificates. Many EAL/D learners aspiring to study in higher education, particularly migrants arriving in mid-senior secondary school years, are not always best served by school pathways, and rely on VET courses to transition to further study. VET and higher education providers in the same regions should strengthen the links between their courses. Further opportunities for English language learning at VET which link to other qualifications and subsequently to higher education are needed.

As already indicated, teaching to meet EAL/D learning needs differs in significant ways from teaching to develop literacy (reading and writing) skills for mother tongue or highly fluent English speakers. Conflating English language skills with literacy skills compromises the foundational skills preparation programs that are a pathway for adult learners into higher education.

To ensure all potential students can succeed in their chosen area of study at higher education, suitably qualified Academic Language and Learning staff in universities and TAFE are required. These positions have been consistently downgraded, casualised or outsourced in universities over the last decade. EAL/D learners benefit from the expertise provided by academic language and learning staff with EAL/D teacher qualifications. This expertise is generally no longer available in universities.

Developing and maintaining clear pathways for members of EAL/D communities into local higher education studies is essential in strengthening communities across Australia. Higher education providers can engage with communities by incentivising higher education staff with appropriate experience and expertise to assist local schools and community providers in offering foundation studies and university preparation programs. Communities and districts with high populations of speakers of English as an additional language or dialect, including recently arrived or second/third generation migrants, are typically found in less affluent areas of major cities and increasingly in regions. Such university-community engagement is urgent in these locations.

Although incoming students may have met university English language entry requirements, most EAL/D learners will need to further develop their English throughout their studies. Specialist EAL/D trained teachers who offer academic language and learning for students in higher education contribute to a high quality student experience for these learners. These experts can also assist colleagues in all fields of study to maximise opportunities for EAL/D learners within their courses. Many examples of successful “embedded models” in supporting skills development in academic language uses have been developed at universities over the last few decades. These should be supported and extended.

Recommendation 7

ACTA recommends that, in pursuance of its access and equity and quality teaching and learning objectives, the Accord require that higher education institutions ensure provision of Academic Language and Learning support for students identified as needing this support and report on provision type, student numbers and how they are identified for support.

6. Conclusion

To be fit-for-purpose in Australia's contemporary society and future, the Australian Universities Accord must recognise the far-reaching implications of the nation's cultural and linguistic diversity for productive skills and industry development, community, industry and business engagement, equity of access and opportunity, societal problem solving and innovation. The Accord needs to ensure that this national interest imperative is embedded in priorities and requirements for higher education teaching and research.
