

# FEEDBACK FORM

## DRAFT ENGLISH AS A SECOND LANGUAGE (ESL) / ENGLISH AS A SECOND DIALECT (ESD) POLICY

The Department of Education and Training is committed to the development of an English as a Second Language (ESL) / English as a Second Dialect (ESD) policy. The policy and additional copies of this feedback form are available at <https://www.learningplace.com.au/deliver/content.asp?pid=41806>

You are invited to provide your written feedback on the draft policy using this proforma. Please submit your completed feedback by **FRIDAY 13 NOVEMBER 2009** to Gillian Bell, Senior Adviser, Student Services Branch [gillian.bell@deta.qld.gov.au](mailto:gillian.bell@deta.qld.gov.au)

### YOUR ORGANISATION'S NAME:

Multicultural Development Association Inc., 512 Stanley Street, South Brisbane, Qld 4101,  
Phone: 3337 5400, Fax: 3337 5444

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### WHO DO WE CONTACT IF WE HAVE ANY QUESTIONS ABOUT THE FEEDBACK YOU HAVE PROVIDED?

Karen Lee, Executive Manager- Government and Community Advocacy Team, Phone: 3337 5414, Email: [karenl@mdabne.org.au](mailto:karenl@mdabne.org.au) ; or  
Ali Ibrahim, African Advocacy Worker, Phone: 3337 5415, Email: [alii@mdabne.org.au](mailto:alii@mdabne.org.au)

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When providing feedback could you please consider the following:

1	Does the draft policy provide greater clarity for schools about the wide range of students to be included in the definition of ESL learners?
	Comments
	<p>MDA supports the feedback given by ECCQ and a combined network of multicultural organisations and seeks to compliment their paper by presenting feedback on issues with a specific focus on refugee students.</p> <p><b>Issues for refugee students</b>  While the definition of ESL learners includes students from a refugee background it must be noted that the learning needs of refugees significantly differ from other students. It is an important note in developing an ESL curriculum which not only addresses these needs but also develops ways in which to engage this particular group of students.</p> <p>Currently in Queensland, funding for ESL support available for refugee students is determined through an index-base allocative model with schools which is often questioned for its effectiveness (considered slow and bureaucratic) and fairness in reaching those who most need assistance. Evidence from community consultations reveal that the current levels of ESL support are insufficient in addressing the learning needs of many refugee students. Anecdotally a number of ESL teachers struggle to support refugee students due to the growing number of students, different learning needs and backgrounds and often insufficient resources.</p> <p>There is growing research which indicates that pedagogical practices used with traditional ESL students (often migrants, Indigenous, students from lower socio-economic areas who are literate in their first language) have limited success when applied to refugee young people. This is due to previous disruption to schooling of refugee students. <sup>1</sup> Furthermore recent literature argues that ESL pedagogy is itself culturally specific and based on teaching European and Asian migrants from literate backgrounds. There are strong argument to propose that ‘refugee students require texts, pedagogies and assessment tools to monitor progress rather than measure summative achievement and to build to on the communicative competences of those from non-literate traditions.’ <sup>2</sup> This is critical given that some evidence suggests that everyday classroom practices and processes may not be apparent to refugee students.</p>

<sup>1</sup> Sidhu R, Taylor S (2007) Educational provision for refugee youth in Australia:left to chance? Journal of Sociology, 43:283

<sup>2</sup> Matthews Julie, (2008) Schooling and settlement: refugee education in Australia International Studies in Sociology of Education, 18:1 31-45

	MDA recommends that the definition include clarification for schools about the specific needs of refugee students.
2	The draft ESL/ESD policy aims to clearly outline the responsibilities of all Education Queensland staff to these students? Do you think the draft policy achieves this?
	Comments
	<p>Page 6 states staff are ready to: “Model appropriate behaviours and to promote an environment... free from unlawful discrimination and harassment”. Additionally the policy gives responsibility to all staff to “Develop own ability to work cross-culturally”.</p> <p>MDA’s consultation with leaders and representatives from new and emerging African communities on ESL policy revealed concerns about various forms of discriminations that African students are faced with in schools. We were advised that particularly problematic levels of discrimination occurred when assumptions are formed by teachers about African students which invariably sets the tone for other students in interacting with African students. Stereotyping, victimisation and racism are key issues that impacts heavily on these students as a group and also as individuals. These comments are not intended to generalise actions by all teachers as we acknowledge that the majority are professional and exemplary, however it is important to note that these incidents continue to occur.</p> <p>MDA recommends that Education Queensland ensures that examples of inappropriate behaviour by teachers must be addressed and that standardised and mandatory cross cultural training should be included as part of the professional teaching code of ethics.</p>
3	The draft policy aims to provide the over-arching policy framework to inform the development, implementation and monitoring of Education Queensland’s ESL-related initiatives, information, procedures and resourcing. Do you think the draft policy achieves this?
	Comments
	<p>The policy provides general reference to development, implementation, and monitoring of the ESL policy. However, it lacks clarity on the following areas:</p> <p><b>Data collection on:</b></p> <ul style="list-style-type: none"> <li>• the population of ESL learners and their geographical location in the state;</li> <li>• how ESL learners are to be identified and who will be responsible form the collection of their statistics;</li> <li>• how data on ESL learners will be collected and their progress monitored.</li> </ul>

	<p><b>Role of ESL unit and teachers:</b></p> <ul style="list-style-type: none"> <li>• the role and responsibility of the Senior ESL Advisor;</li> <li>• the role of Head of ESL Units, ESL teachers, community liaison officers teacher aides, bi-lingual workers and their responsibilities within the implementation of the ESL policy;</li> <li>• how many ESL teachers, teacher aides, and community liaison officers are currently employed by Education Queensland, how many will be recruited and when the recruitment will commence;</li> <li>• how many schools offering post arrival intensive language program are there in Queensland and how many more will be required in implementing the ESL policy;</li> <li>• details of professional development available for mainstream subject and ESL teachers, including teachers aides, community liaison officer, and bi-lingual workers, during the implementation of ESL policy.</li> </ul> <p><b>Policy considerations on:</b></p> <ul style="list-style-type: none"> <li>• brief explanation on federal and state budget for ESL learners as well as a resources and allocation model;</li> <li>• the special needs of newly arrived refugees.</li> </ul> <p>Some of the abovementioned issues are elaborated further within this document, and we hope that the ESL policy reflects feedback given by the community sector. Additionally, we recommend that Education Queensland provide the sector with a detailed program response as well as a comprehensive ESL Handbook that will be used as a guide in the implementation of ESL policy to further inform the sector on the proposed rollout.</p>
4	<p>The draft policy aims to provide clarity for Principals and teachers about their roles, responsibilities and professional practice in working with ESL learners? Do you think the draft policy achieves this?</p>
	<p>Comments</p>
	<p>The policy outlines the role and responsibilities of Principals and teachers, but does not elaborate on how they will be supported to achieve their aims. Therefore our comments will relate solely to the following items in the policy:</p> <p><b>Role and responsibilities expanded</b></p> <p>The policy makes no reference to the roles or responsibilities of the Head of ESL Units, ESL teachers, teacher aides, bi-lingual and multilingual staff which should go hand in hand with that of Principals and teachers. There is also a silence on the roles and responsibilities of the State-wide role of the Senior ESL Advisor. It is also a concern that the role of the Senior ESL Advisor appears to be a part time position and not a full time role with resources dedicated to its functionalities.</p>

### **Commitment of School Principals to ESL**

In our consultations, many community leaders expressed doubts about the commitment of certain school principals or boards of management who do not consider it an integral part to the school curriculum. Leaders have raised the issue that this reinforces a culture in schools that frustrates the education experience for refugees and CALD students.

MDA recommends Education Queensland ensures that:

- it should be mandatory for all principals with ESL learners in their schools to commit to the implementation of the ESL policy;
- implementation of the ESL policy should be monitored by the Central Office and Regional offices;
- The office of the Senior ESL Advisor be given the responsibility of ensure that all students from CALD background are properly identified, assessed and included with the definition of ESL learners.

### **Interpreting issues**

Page 6, 7 and 8 states: “Principals, teachers and regional offices to implement the Queensland Government’s Language policy when communicating with students and their parents.” Interpreting services are particularly important in engaging students and their parents in the education system. However, many schools have advised they do not engage interpreters when communicating with parents. The approach and framework of engagement with refugee and CALD students and their families with state schools’ is largely dependent on the management of the school and the application of these frameworks by individual classroom teachers. State schools vary considerably in their methodology when engaging with refugee and CALD students and families. Consultations have revealed that there are still incidents where a clear break down in communication partnered with structural, social and cultural assumptions have resulted in negative outcomes for refugee and CALD students and their families. An example of this is clearly evidenced in a recent series of events which occurred at a school where a Grade Two teacher reprimanded a student from a refugee background for failing to meet standards set out in a behavioural contract, which the school assumed was fully understood and agreed to by all parties involved. This resulted in the student being unable to participate in a school excursion. This is a clear example where students are penalised due to the lack of employing adequate interpreting services to assist both students and families understand rules and regulations.

Therefore, MDA urges Education Queensland to ensure that:

- clear and unambiguous instruction be given to schools in complying with the Queensland Government’s Language policy and Client Code for each school;
- complaint procedure forms are introduced for parents/guardians which are then to be lodged at a central collection point.

### **Recruitment of ESL Teachers**

Page 9 states: “Develop strategies to attract and retain teaching staff with ESL qualifications and experience, including career pathways.” Currently, ESL teachers are engaged on a casual or part time basis which does not guarantee a high retention rate of

	<p>qualified ESL teachers. Consequently, schools that don't have a dedicated ESL teacher on their staff usually employ visiting teachers. As a result, the lack of continuity makes it difficult for the ESL learners to make progress.</p> <p>Further on, it states: "Develop strategies to attract and retain individuals of culturally and linguistically diverse backgrounds and bilingual and multilingual staff for employment in schools".</p> <p>MDA welcomes this inclusion as the role of community liaison officers and teacher aides are invaluable. Currently there are very few community liaison officers and/or teacher aids working in mainstream schools, such as Coorparoo Secondary College and Sunnybank, Yeronga, and Kedron State High Schools. This is a major issue especially for those out in the regions.</p> <p>MDA recommends that Education Queensland consider strategies around:</p> <ul style="list-style-type: none"> <li>• developing career paths for ESL teachers/teacher aids/bilingual workers/community liaison officers on fulltime/permanent part time basis;</li> <li>• developing a pool of ESL teachers/teacher aids/bilingual workers/community liaison officers that could be shared between schools in the same area or region;</li> <li>• developing career path way for ESL teachers/teacher aids/bilingual workers/community liaison officers to work as mainstream teachers, when ever the number of ESL learners diminishes in a particular school/s, to solve shortage of teachers in the area or region.</li> </ul>
5	<p>The draft policy aims to provide clarity for regions and central office about their roles and responsibilities in the development and monitoring of policy, resourcing and strategies targeting ESL learners. Do you think the draft policy achieves this?</p>
	<p>Again, responsibilities for these parties are listed but have no indication on how these will be further developed or implemented. Therefore our comments will relate solely to the following items in the policy which we believe should be foundational issues:</p> <p><b>Best practice models</b>  Page 8 states: "Monitor national and international research related to inclusive education and ESL to ensure initiative reflects evidence-based research findings and are consistent with Queensland Government policy."</p> <p>MDA strongly agrees with this statement and recommends that the Central Office, not only monitor research by others, but also proactively conduct their own research in collaboration with universities on ESL learners and their progress in Queensland. Additionally, we recommend that the Central Office consult and liaise with counterparts in other states and consider adopting examples of best practice models when implementing ESL support, especially in considering ways in which to cater for newly</p>

arrived refugees.

It is understood that New South Wales and Victoria are considered to be pioneers in leading on education initiatives and have made significant progress in the field of ESL learners. Of interest may be Victoria's "The ESL Handbook - Advice to schools on programs for supporting students learning English as a second language". This handbook and other related information can be obtained from the following web links:

1. [The ESL handbook \(PDF - 344Kb\).](#)
2. [www.education.vic.gov.au/studentlearning/programs/esl](http://www.education.vic.gov.au/studentlearning/programs/esl)

The issue of developing and implementing best practice must also go hand in hand with adequate levels of resourcing and the political will to commit to this.

### **Resources and funding level**

Page 8 refers to issues with regard to budget/funding/resources. We believe a proper commitment to this policy requires sufficient funding and resources. Studies show that New South Wales and Victoria are spending 50% and 65% respectively more than what they receive from Federal Government and should be a guide to the Queensland Government. The levels of funding equate with the levels of success of students in the southern states. A report from the Commission for Children and Young People and Child Guardian entitled "Snapshot 2009: Children and young people in Queensland" found Queensland students performing less favourably in comparison with other states. The link to the Education part and the whole document can be accessed from the following web links respectively:

1. [http://www.ccypcg.qld.gov.au/pdf/publications/reports/snapshot2009/Snapshot2009\\_11-Education.pdf](http://www.ccypcg.qld.gov.au/pdf/publications/reports/snapshot2009/Snapshot2009_11-Education.pdf)
2. <http://www.ccypcg.qld.gov.au/about/publications/snapShot09.html>

The above report highlights the importance of increasing funds and resources significantly, if Queensland is wanted to remain competitive with other states. With the current globalized economy and modern technology, Queensland students deserve to be supported adequately in order to excel with their studies. In doing so Education Queensland should give priority and significant support to the ESL learners in order to catch up with the rest of Queensland students.

MDA recommends Education Queensland commit more funding to close the gap in performance levels identified above and to additionally respond to the additional needs of ESL learners.

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**Please add any other comments you may have**

### **Specific issues new and emerging communities**

#### African students

It is MDA's experience that some African young people often have higher English language proficiency than other refugee groups

but still experience significant difficulty within the education system.

Other African students may be illiterate or have low levels of literacy in their first language which impedes the learning of English as a second language. This is especially evident where some African cultures have primarily an oral culture. Research indicates that it can take two years for second language learners to become fluent in basic interpersonal communication, but between four to seven years to gain academic English proficiency. For refugee students with disrupted school some studies suggest it takes up to ten years to acquire academic proficiency.<sup>3</sup> Anecdotal evidence from teachers and parents is that many refugee students struggle with communication with teachers, assignment work, exams, working in groups and generally coping with the structure and expectations within a classroom setting.

Regardless of their language proficiency, most African students have received little or no formal schooling prior to their arrival in Australia. Due to their refugee experiences many students have experienced disruption to their education and trauma in their home countries and/or refugee camps. Many have experienced extreme violence, spent long periods in refugee camps, suffered from torture and trauma and be affected by the loss of family members. These experiences can have a lasting and profound effect on their ability to settle and integrate into the school system life in Queensland.

#### Burmese communities in the Northside of Brisbane

On the Northside of Brisbane different schools have responded in varying ways to their changing school population; reasons being are primarily around the framework and knowledge that is or is not already established inside the schools workings.

Limited access to interpreters and financial support required to engage frequently with interpreters has resulted in students from refugee backgrounds not fully engaging with extra curricula activities, such as; school camps, excursions, swimming lessons and after school/ vacation care activities. Limited availability of interpreters also results in schools bulking their meetings with parents to cover multiple topics in one meeting. Communication barriers resulting from minimal access to interpreters have resulted in behavioral and integration issues for many students.

Students from refugee backgrounds over the age of 11 who required extra ESL assistance will often travel for over an hour on two forms of public transport to attend Milperra Special School. However, due to the long distances, schools days are long and tiring for these students. There has also been an incident where two 12 year old Rohingya children were assaulted at their local train station when travelling home from school. The children were followed home and their family home was damaged and property was stolen. As these students return at a regular time each day they were repeatedly followed home and assaulted with little response from the local police station. These incidents have raised concerns in the family and community about the safety of their children travelling long distances to access appropriate schooling.

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<sup>3</sup> Miller J, Mitchell J and Brown J, African refugees with interrupted schooling in the high school mainstream: Dilemma's for teachers.

### **High School**

Page 5 states: "Some ESL learners may have prior educational experience with literacy in a different script and others may come from an oral cultural background and have no experience of literacy in their first language. Some ESL learners have experienced severely disrupted schooling with little opportunity for literacy development."

While the policy recognises the significant barriers that students from CALD and refugee backgrounds face when accessing education, but it does not acknowledge the important role that schools like Milpera or Woodridge State High Schools play in catering for these types of students who require intensive assistance on arrival. This has been a concern among African community leaders and representatives, as there is no mention about the need for these bridging schools in regional areas like Toowoomba. We are advised that NGOs in Toowoomba have lobbied for this to be introduced but have not been successful.

MDA believes that it is crucial to introduce bridging schools like Milpera in regional areas to cater for new arrivals from refugee backgrounds and immigrants. Therefore, MDA recommends that more bridging schools in regional settlement areas like Toowoomba, Cairns and Townsville, be established.

MDA notes the post new arrival intensive language programs that is offered in the following High Schools:

1. Coorparoo Secondary College
2. Indooroopilly State High School
3. Kedron State High School
4. Keebra Park State High Schools (Gold Cost Area)
5. MacGregore State High School
6. Nambour State High School (Sunshine Coast)
7. Sunnybank State High School
8. Yeronga State High School

These schools, with the exception to Keebra and Nambour State High Schools, enrol students exited from Milpera State High School. MDA recommends that Education Queensland ensures that the support and resourcing given to the existing ESL Units in the aforementioned schools be continued. Furthermore, that this be extended to high schools in the Northern suburbs of Brisbane as well as the regional areas.

### **Primary schools**

Refugee and immigrant children between the ages of 5 to 12 are enrolled in private or state primary schools. We are advised from consultations that 'some primary schools with high numbers of ESL learners have ESL teachers on staff. Others receive support from visiting teachers'. 2

Children who are enrolled at primary schools are placed in grades according to their age rather than their ability. Concerns have been raised particularly for young people who arrive in year 5 or 7 who will soon be at high school and have inadequate time to become functional learners in English. Students at primary school level receive only 3 years of ESL support with limited hours per week. In one of the consultations held with African community leaders we were advised that this is patchy and inconsistent and in practice could translate to as little as 1 or 2 hours per week. It is important to note that refugee young people are still actively acquiring the Standard Australian English necessary to access the mainstream curriculum. There is a significant 'gap' between their mastery of academic English and their ability to meet the demands of their age appropriate mainstream curriculum.

MDA recommends that :

- New arrivals commencing at Year 4 and above should be given intensive language support;
- the ESL years should be more than 3 years for those who need most of support;
- increasing the number of days and hours for ESL learners to succeed in acquiring English proficiency before they are exited to secondary schools; and
- teacher aides should be introduced in primary schools to assist ESL and mainstream subject teachers.

**Other ESL policy recommendations for consideration:**

1. A formalised ESL in Queensland's state education system or refugee education policy must have a consistent framework across the state to support schools for this to be successful;
2. There be a stronger emphasis on the process/issues before young people get to ESL;
3. For ESL to be effective it must be integrated with curriculum for the whole school and connected in with the student's social and well-being needs.