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AMEP and the Burden of Compliance

Chris Corbel Lecturer & Coordinator, The University of Melbourne, Australia

Abstract

This article explores the 'burden of compliance' experienced by providers and teachers in the Adult Migrant English Program (AMEP), a large national English as an Additional Language (EAL) program in Australia. It shows how compliance requirements have been shaped by the relationship between two groups, those who make and operationalise relevant policies (mainly politicians and public servants) and those engaged in the practice of developing and teaching English courses (mainly teachers, program providers, and academics). These two groups are engaged in a struggle for the control of a metaphoric 'pedagogic device' (Bernstein, 2000) which shapes curriculum documents such as the frameworks, scales and teaching resources used in the AMEP. The article examines three key teaching and assessment documents and shows how the compliance requirements attached to each have been shaped by the relationship between these two groups over time. A crucial dynamic governing this relationship is the level of trust between and within them. The article argues that changes in levels and types of trust account for many of the tensions within the AMEP. It begins by describing how compliance was raised as an issue and introduces the key concepts that inform the discussion. The second part of the article tracks changes in approaches to compliance as manifested in three AMEP curriculum documents over 75 years. The third part identifies three policy trends that contributed to compliance becoming the burden currently experienced by providers and teachers. The article concludes that there are signs that trust between stakeholders may be changing, with a potential reduction in the burden of compliance.

Correspondence
Chris Corbel
christopher.corbel@unimelb.edu.au

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Introduction

This article arose from a presentation entitled *A reflection on curriculum innovation in the AMEP* (Corbel, 2023). For over fifty years I have been a teacher, curriculum manager, professional development manager, national project manager and academic consultant for public and private providers of the Adult Migrant English Program (AMEP), a large national English language program for adult migrants to Australia. In June 2023, I was an invited speaker at its 75th anniversary AMEP Service Provider conference. My topic was a personal reflection on innovation in the AMEP curriculum. My theme was "meeting midway", a reference to the name of the migrant hostel where I had my first AMEP teaching job in 1974, and also to the relationship between program stakeholders themselves. The 75th anniversary conference celebrated AMEP successes, as had the 50th anniversary conference in 1999 at which I also spoke. But, as with most anniversaries, there was an undercurrent. This came to the surface at the end of my presentation when a participant suggested that I had overlooked the 'burden of compliance', the increasingly onerous requirements of documenting curriculum activity (Department of Home Affairs, 2021). This turned out to be a common topic throughout the casual conversations taking place among conference participants. My contact with the program had lessened between the 50th and 75th anniversaries, so I was confused. What had happened to the AMEP curriculum in this period that had led to this dissatisfaction among many of its teachers? Did this dissatisfaction have serious implications for the AMEP itself? It seemed that while "meeting midway" was a noble collaborative goal, and had apparently achieved some successes, something was happening which did not involve meeting midway at all. Why had this question about compliance been the only one raised as a challenge to my account of curriculum innovation?

To address this question, I have drawn on the theories of Basil Bernstein, whose work offers explanations of the reproduction of inequalities in education and possibilities for challenging them (Barrett, 2024; Bernstein, 2000). Curriculum for Bernstein is the knowledge, both knowing-*that* and knowing-*how* (Winch, 2017), which is the content of a course of study. The process whereby knowledge moves from its source format to the format with which learners engage is referred to metaphorically as the 'pedagogic device' (Barrett, 2024; Singh, 2002). The curriculum as it is experienced by teachers is shaped by the power of the group most able to exert influence and control over the knowledge selected as content for the curriculum. For Bernstein, the curriculum is a site of struggle.

There are three stages in the process of curriculum development in Bernstein's model—Production, Recontextualization, and Reproduction. The focus in this article is on the second stage. It is at this point that there are substantive choices to be made about the selection, sequencing, format, presentation, and assessment of knowledge. It is here that the struggle for control of the curriculum is focused. There are two broad groups involved in this struggle (Bernstein, 2000). The Official Recontextualisation Field (ORF) comprises politicians, policy makers, industry associations, regulatory agencies, and public servants. They are responsible for setting broad directions and governing and regulating the overall field of education. The

Pedagogic Recontextualisation Field (PRF) comprises education academics, professional associations, providers, and teachers. They are responsible for actual educational programs, including shaping what is delivered and how. Both groups share a concern for planning and implementing courses of action that meet their goals. If the goals align, there is cooperation. If they do not align, there is tension and even conflict. The resulting tension is what Bernstein calls the struggle for control of the pedagogic device (Bernstein, 2000). This struggle is captured in key curriculum texts.

An important element in the relationship between the ORF and the PRF is the level of reciprocal trust. The kind of power held by the ORF dictates that the ability of professionals— in this context, the PRF—to exercise "discretionary power" is an indicator of the level of trust by the ORF in their work (Frowe, 2005). What counts as professional trustworthiness has traditionally derived from the mastery of a professional body of knowledge, the requirements for entering a profession, and the altruistic motives ascribed to professionals (Frowe, 2005; Young & Muller, 2014). However, this "occupational" type of professionalism (Evetts, 2018) is no longer as prominent as it once was. Evetts (2009) suggests that a second "organisational" (also referred to as "managerial or "instrumental") type of professionalism has emerged. In this view, professionals' responsibility is not to the values, norms, and standards of a profession, but to the goals and methods of the organisation within which they work. Professionals are no longer evaluated externally by peers, but internally by managers. My observation of the AMEP over decades is that many members of the PRF demonstrate a third type of professionalism, "personal" professionalism (Bathmaker & Avis, 2013), typified by a strong personal commitment to their learners. This personal professionalism is as strong as occupational and organisational professionalism in the AMEP.

In the last 30 years in particular, there has been a steady erosion of the PRF's discretionary power as the ORF has sought to exert control over the AMEP curriculum through increasingly onerous forms of compliance. The burden of compliance perceived by the PRF suggests that the organisational view of professionalism has been imposed by the ORF, which is at odds with the more discretionary occupational view held by many in the PRF. The perceived burden of compliance suggests there has been an over-reliance on the personal professionalism of many AMEP teachers as well.

Over the 75 years of the AMEP, there has been increasing distrust between governments and the providers and users of government services. This has been the case in all social service sectors in "Western welfare states" (Yeatman, 1990), not least in education (Neidlich et al., 2021). My argument is that this distrust is an important force behind the compliance burden facing AMEP providers and teachers. An examination of changes in the key AMEP curriculum texts over time will provide insights into the development of the burden of compliance now encountered by teachers and providers.

Changes in curriculum compliance

Over time, the three most significant curriculum texts for the AMEP have been *Situational English for Newcomers to Australia* (Australian Government Publishing Service [1968], hereafter *Situational English)*; the *Australian Second Language Proficiency Ratings* (Ingram & Wylie [1984], hereafter the ASLPR); and the *Certificate(s) in Spoken and Written English* (Hagan et al., [1993], hereafter the CSWE). Almost every AMEP teacher has had to engage with one of them in some way or another. These texts can be seen to represent the heart of the struggle over the AMEP curriculum and the pedagogic device.

From its inception in the late 1940s until the mid-70s, the AMEP was viewed by the Commonwealth Government as a temporary measure to address increasing post-war immigration (Martin,1999). The Commonwealth funded TAFE Colleges to deliver the AMEP, together with what became the Adult Migrant English (or Education) Services in Victoria and NSW, until 1998. Producing the AMEP curriculum was the responsibility of a handful of language experts in the Commonwealth Office of Education. There was no government interest in the details of the curriculum as such (Martin, 1999). Teaching revolved around a key curriculum text, *Situational English,* a series of six books with a teacher's book and a student's book at each of three levels. The focus was on the very detailed Teacher's Book, which provided a tight framing of the structure and wording of lessons (Martin, 1999). Compliance requirements were to do with teaching, not assessment. There was no formal mechanism for assessing students. *Situational English* was based on the Australian Situational Method, which in turn was based on the Direct Method (Hornby, 1950) and audiolingualism (Rivers, 1968). A method is a fixed way of doing things, and this method was indeed firmly fixed. It emphasised habit formation through repetition and substitution drills. The term 'situational' refers to the teaching techniques used in the classroom rather than social situations likely to be encountered by the learners. The format and presentation were also firmly fixed, as was the content and sequencing.

Within the ORF, government and public servants trusted a handful of language experts (the PRF), to decide what should be taught. However, my experience as a teacher suggested a lower level of trust *within* the PRF. The Australian Situational Method developers allowed very little discretion on the part of teachers. This was a realistic and broadly (though not universally) accepted response to the needs of teachers, some of whom were not trained in English language teaching beyond basic techniques. Teachers were treated as "executive technicians" (Winch, 2017) rather than professional language teachers, so the issue of professional trust, and hence discretionary judgment, other than in the minute-by-minute work of the classroom, did not arise (Martin, 1999). In the absence of a professionalised PRF, there was therefore no struggle for control over the pedagogic device as it was manifested in *Situational English.* The only compliance required was using the Teacher's Book. By the 1970s, however, there were increasing tensions (Nunan, 2013) over the rigidities and inappropriateness of *Situational English*. Over time, variations to the sequence and content became tolerated (Martin, 1999). Other named methods with distinctive techniques, such as *All's Well*, *Suggestopedia* and *The*

Silent Way, began to be used. In my experience as an organiser of teacher training, these too required strict compliance with their specific teaching techniques.

A major review of the AMEP (Galbally, 1978), initiated and then accepted by the then-Government, led to the introduction in the early 1980s of a second key curriculum text, the *Australian Second Language Proficiency Ratings* (ASLPR) (Ingram & Wylie, 1984), as a common reference point for placement, teaching and assessment. The focus on specific elements of language structures of *Situational English* was replaced with a focus on general levels of language use, termed 'proficiency'. Unlike *Situational English,* the ASLPR was a reference, not a source of teaching activities. These were to be chosen by the teacher.

This change reflected the global shift in the PRF towards a 'Communicative Approach' (Nunan, 2013), which focused on the social purposes (or 'functions') of language. Unlike a method such as the Australian Situational Method, an approach is less directive. It requires teachers to draw upon principles of teaching and learning to design their own responses to a more complex view of learner needs. Although Communicative Language Teaching attracted some named approaches such as the Natural Approach (Richards & Rodgers, 2014) and became primarily associated with a range of teaching techniques such as group work and tasks, it was not a fixed method and had no compliance requirements for how students were actually taught. The adoption of the ASLPR was thus a high-trust decision by the ORF. It required all teachers to both teach and assess students, which required a higher level of professional knowledge and skill. To facilitate this, teachers now had more professional development requirements and opportunities, including university English Language Teaching qualifications, as well as well-developed professional development programs offered by the AMEP providers (Bottomley et al., 1994; Martin, 1999).

There were tensions between the ORF and the PRF in the transition to the new approach, however, as exemplified by the National Curriculum Project (Burton, 1987; Nunan, 1987). A review of the AMEP (Campbell, 1986) found considerable uncertainty among teachers about the application of the extensive range of resources that had replaced *Situational English*. The review recommended that a small group of experts be assembled to prepare national guidelines and resources, as had been done with *Situational English*. An alternative was suggested by the heads of the National Curriculum Resource Centre (NCRC), a PRF entity, which was to undertake a national development project drawing on the expertise of all teachers as the basis for the curriculum resources. The ORF accepted the PRF experts' recommendation that teachers had the capacity to do this work. The result was an optional collection of resources called *Frameworks* (Nunan, 2013). Overall, it was a time of "meeting midway" between the ORF and a more professionalised PRF, which was now able to exercise more discretion in pedagogy and resource development. The ORF had created the conditions that fostered the professionalisation of the PRF at the same time as ideas about language teaching expanded and became more complex, requiring that very professionalism. By the end of the 1980s, compliance for teachers only related to the occasional use of the ALSPR and did not affect day to day classroom teaching (Bottomley et al., 1994). The PRF now had greater control over the

pedagogic device, in the form of the discourse of the 'learner-centred' curriculum (Martin, 1999; Nunan, 2013).

In the early 1990s the AMEP came under the influence of the Vocational Education and Training (VET) sector, which itself had moved from being a national training system to a national training market. Both the ORF and PRF were now driven by the government's National Training Agenda, which required the reform and accreditation of programs to align with its economic requirements (Martin, 1999; Moore, 2001). AMEP courses now needed to be based on the nationally mandated Competency Based Training (CBT) curriculum model, introducing a vocational perspective into what had been seen as a settlement focused program. Competency Based Training was ideal for the requirements of the National Training Agenda, not because it reflected sound educational principles and practice, but because it used finely detailed outcomes descriptors. These were amenable to simple, detailed measurements suitable for checking compliance with program goals, which were now employment rather than settlement related (Jones & Moore, 1995). It met political (ORF) rather than educational (PRF) needs (Moore, 1996). Whether or not what was being measured was educationally valid or appropriate had never been the primary concern of the ORF. Their concern was only whether the program outcomes could be understood by the "consumers" of the information, from the minister of the day down through employers and ultimately, in theory, the taxpayer (Wheelahan, 2010). The AMEP had no choice but to address this change.

As a result, a third key curriculum text was chosen for the AMEP, the *Certificate(s) in Spoken and Written English* (CSWE) (Hagan et al.,1993). Unlike the *Situational English* focus on specific elements of language structure, and the ASLPR focus on levels of language use, the CSWE focused on specific elements of language tasks. Developed by members of the PRF, the CSWE followed the VET curriculum format, containing detailed information about target task behaviours (described as competencies) and their assessment. The CSWE brought together an increasingly influential view of language in Australia, based on Systemic Functional Grammar, with the VET curriculum paradigm, Competency Based Training (Tilney, 2023). The CSWE also offered resources and a teaching method, the Teaching Learning Cycle (Tilney, 2023).

The location of the AMEP in VET had a major impact on the curriculum. In principle, the CBT model in Australian VET curriculum is agnostic regarding pedagogy. In a highly structured, outcomes-focused VET curriculum, it is the one area where teachers have notional agency. In practice this is easily overwhelmed by the details involved in assessment, which has a much higher focus in CBT. The PRF, in theory, manages the inputs, while the ORF is more concerned with the outcomes. However, the washback effect of the intended outcomes drove the teachers' work, as teachers were required to, in effect, teach to the test. Unlike the professional judgment required of an approach, or even a method, the term *training* in CBT implies the routine following of rules mandated by the ORF. Compliance now required the following of these rules as set out in the VET training packages. Compliance no longer related to teaching, however, but to the detailed rules relating to assessment. While the actual curriculum contents were the products of work by elements of the PRF, the overall VET framing of the AMEP meant that the pedagogic device was once again largely in the hands of the ORF.

How compliance became a burden

During the 1990s, a more onerous accountability regime was imposed in the form of a new curriculum framework in which compliance with rigid techniques of assessment and a focus on outcomes was central. This reflected a growing distrust among the politicians and public servants from the Official Recontextualisation Field (ORF) of the providers and teachers of the Pedagogic Recontextualising Field (PRF). Three features of the broader political and ideological environment—the certification of outcomes, competition between providers, and conflation of programs—reflected and exacerbated the lowering of trust on the part of the ORF in the professional discretion of the PRF.

The first of these features was the certification of curriculum outcomes. The discourse of nationally agreed standards and descriptors of the National Training Agenda led to the development of accredited and therefore standardised certification of outcomes. Certification reflected the change in goals by the ORF from what was said to be "inputs" to "outputs". No longer satisfied with statements of hours spent in learning, the ORF focus was now on what the taxpayers were getting for their dollars (Moore, 1996). This was a result of a change in the ORF itself, as the public service moved towards the "neoliberal" ideology of New Public Management (Evetts, 2009; Yeatman, 1990), with a focus on 'steering rather than rowing'. Instead of providing services directly, the government now set the course and used the public service to outsource the work to third party providers. This required greater control in the name of 'transparency' through the increasing use of audits (Rose, 1993).

The second feature of the new environment that affected trust was competitive tendering between providers for delivery of the AMEP (Martin, 1999) and the admission of private providers into what was now seen as a 'market'. In the New Public Management environment of the early 1990s, those who deliver services were now suspect in the eyes of the ORF. There was fear of 'provider capture'—the steerers and rowers were seen to be too strongly aligned. The collaboration that had led to the successes of the 1980s was now replaced by competition. The well-established, professionally staffed, and highly specialised Adult Migrant Education Services in each state now faced competition from other providers, both public and private (Ball & Youdell, 2008). This was not necessarily a bad thing if the arrangements maintained the quality and continuity needed for the continued success of the program. That, however, was not necessarily the case (Moore, 2022a). Teachers now worked for providers under constant pressure of compliance with the requirements of their registration as a provider, as a deliverer of courses, and possibly a more general scheme such as the International Organization for Standardization (ISO) standards. Their employment was increasingly dependent upon short term contracts. Many AMEP teachers had become members of the "precariat" (Standing, 2011).

Thirdly, the conflation of language, literacy and, later, digital literacy and employability into Foundation skills added to the increasing burden of compliance by combining students into classes funded from multiple sources. The language/literacy conflation was supported by the impetus provided by International Literacy Year (in 1987, the United Nations General

Assembly proclaimed 1990 to be International Literacy Year) and entwined in later policy debates around the National Policy on Languages and the Australian Language and Literacy Policy (Moore, 2002). The upshot was that English as an Additional Language (EAL) was no longer seen as a distinct area of learning by the ORF, notwithstanding continuing debates on the issue within the PRF. There were also debates within the PRF relating to the distinctiveness of adult language learning in relation to adult literacy learning. The ORF saw this debate about distinctions between language and literacy in language policy as special pleading or as simply irrelevant (Moore, 2002). To a lesser extent there were elements of disagreement within the PRF over the move to the CSWE (Bottomley et al, 1994). These divisions worked to the ORF's advantage, as did the closing over time of the various national support units. Professional development was now focused simply on basic competency-based training rather than other pedagogical and curriculum issues. The ORF had now fully wrested back control of the pedagogic device.

How the burden of compliance became unsustainable

"Professionals clearly need to be accountable for their actions, but what they are accountable for and to whom are thorny questions" (Frowe, 2005, p. 43). In the AMEP the answers have come in the form of the imposition of ever more onerous curriculum compliance. This burden of compliance became unsustainable after the introduction of the AMEP's New Business Model in 2017 (Australian Council of TESOL Associations [ACTA], 2024). Although there was no change to the overall CBT curriculum framing, the changes to the AMEP delivery contract created a period of unparalleled complexity. Crucially, this contract allowed choice of the curriculum, an apparent indicator of trust in the PRF. However, the professionalism of teachers was primarily called upon not to make the choice but simply to implement whatever had been chosen for them. There was tension in trying to reconcile the demand for consistent national reporting with the need to assess against the various curriculums chosen. To achieve national comparability, all providers were now required to use the *Australian Core Skills Framework* (ACSF) as a reporting tool (further embedding the conflation mentioned above). Providers and teachers found themselves under pressure from two directions. They needed to carry out teaching assessments as required as a registered training organisation and also to report learners' progress, not against the ASLPR (now ISLPR), but against the ACSF, in order to meet AMEP Key Performance Indicator requirements. Unlike the ISLPR, the ACSF was not designed for reporting on second language learning, thus adding to the complexity. This had the effect of heightening still further the compliance requirements. For some it was just too much (ACTA, 2024; Moore, 2022a, 2022b).

Reducing the burden of compliance

Compliance by professionals in an environment of trust need only be part of routine professional practice, not a burden. Reducing the burden of compliance thus requires an

increase in the level of trust between the ORF and the PRF. There have been signs that this is happening. A focus within the AMEP at any time is preparation for the next AMEP triennial contract. It is in the consultations for this contract that the struggle over the pedagogic device is most active. An indicator of renewed trust in the early 2020s was a series of engagements between the ORF and the PRF that informed the planning for the next AMEP contract (Department of Home Affairs, n.d.). In 2023, after surveys of providers and users and discussion with PRF representatives in an AMEP Advisory Committee, the ORF announced that a single national curriculum framework would be re-introduced in 2025. This would be the *Certificates in English as an Additional Language* (CEAL), which had emerged from an EAL context and has already been in use in the AMEP.

Following these consultations, another "New Business Model" was announced (Department of Home Affairs, n.d.), with three components that have the potential to ameliorate the burden of compliance. The first component is the reintroduction of a national curriculum, the CEAL, mentioned above. An advantage of a common curriculum will once again be to provide a shared curriculum language and avoid the excesses of reporting against two frameworks or converting one to the other. A second component of the model is the AMEP Academy. The valuable role of central professional development centres in the AMEP is well documented (Martin,1999; Tilney, 2023). The previous success of these nationally focused entities could provide an appropriate research and support agenda that could be driven by the PRF as well as the ORF. Professional development could focus not just on VET compliance issues but also on issues of adult EAL learning. A third component, AMEP Innovate, could bring the previous two components together with local involvement to recapture the previous strengths of the program. Investigating ways of reducing the burden could be the focus of innovations such as those showcased at the 75th AMEP anniversary conference. Moore (2022b) presents detailed suggestions about what could be expected from these initiatives.

There are also changes taking place within the broader VET curriculum. A current project, VET Qualification Reform, has recommended three new broad qualification types, including qualifications that develop cross-sectoral or foundation skills and knowledge which may be applied across industries, or lead to tertiary education and training pathways (Department of Employment and Workplace Relations, 2024). This is in keeping with Wheelahan's (2016) call for a new focus on broader capabilities and capacities in the VET curriculum. However, though some amelioration of the burden of compliance may be possible, competency-based training itself will not be going away any time soon (Department of Employment and Workplace Relations, 2024). It will therefore remain in place for the AMEP as well.

In the absence of substantive change, how can AMEP teachers act to reduce the burden of compliance in a continuing low-trust environment? This varies between education sectors. For teachers in schools, Ro (2024) recommends more engagement in curriculum planning and design. This is unrealistic in the VET sector, where such decisions are made by the ORF on behalf of industry as much as by the PRF on behalf of students. Gore et al. (2023) show how professional development can "create spaces of freedom even within regimes of performative accountability" (p. 466). They too are talking about schools, which at least have the benefit of

co-location of staff. Such co-location is less a feature of AMEP delivery now than it once was, and its benefits are thus harder to achieve. For teachers in Further Education in England, whose conditions are much more like those of Australian VET teachers, Bathmaker and Avis (2013) recommend a focus on pedagogy as the bridge between teachers' actual work and the broader context. They focus on a fourth type of "transformational" professionalism:

> Such an approach would combine the pressing need to find ways to enable practitioners to engage critically and reflexively with issues that are important to their practice, including teaching and learning, relations with students, and subject specialism, with the construction of more democratic forms of professionalism. (Bathmaker & Avis, 2013, p. 745)

It is here that professional associations play a crucial supporting role. Yet time is again a problem. What should be the focus of professional learning? Newer pedagogical directions, such as plurilingualism (Choi et al., 2024), could be of interest to teachers, but even the established teaching methods are no longer supported (Tilney, 2023). At the personal level, Mercer's (2021) call for 'wellbeing competence' is a sign of the times, and one with which many would agree, though yet another competence may be one too many. Essentially, individuals need to recognise the version of professionalism that resonates for them. Whichever it is, the nature of the contest between the ORF and the PRF, and their struggle for control of the pedagogic device, is part of the professional understanding that all language professionals need to have.

Conclusion

Compliance is not inherently a problem when it supports the professionalism of the teachers and bodies who are required to abide by its requirements. It became a burden in the AMEP when the ORF's trust in the professionalism of the PRF was reduced and compliance requirements came to dominate all aspects of teachers' professional work. It was underpinned by a wider move to public administration that, among other things, no longer trusted professional experts. It became unsustainable when, ironically, greater freedom of curriculum choice by providers was allowed, creating a greater need for control by the ORF and greater complexity for the PRF. There is now a fourth key curriculum text, though it remains within the CBT paradigm. There are signs of increased trust between the PRF and ORF over recent years. All of this was the undercurrent that I encountered in my presentation at the 75th anniversary of the AMEP.

In this article I have analysed these events in Bernsteinian terms as manifestations of the struggle for control of the pedagogic device, focusing on professionalism and trust among two stakeholder groups, members of the Official Recontextualization Field (ORF) and the Pedagogic Recontextualization Field (PRF). I have examined this struggle as it has been manifested in three curriculum texts. Each of these had compliance requirements, which varied

in the extent to which they drew upon the professionalism of teachers. As trust in teachers lessened these requirements became more burdensome. This analysis is both informed and limited by my own experience. A more detailed examination of the experiences of members of the ORF and PRF regarding the issues of professionalism and trust would provide further insights.

I conclude that there is potential for the amelioration of the burden of compliance in the AMEP curriculum. There will always be tensions between those responsible for governing a program (the ORF) and those responsible for delivering it (the PRF): their responsibilities are different. The tensions need to be understood and respected on both sides. Trust occurs when both groups believe they are working in their different ways to achieve a common goal—meeting midway, so to speak. There are signs that this is happening. At the 100th anniversary of the AMEP, we might look back and see the 75th anniversary as the beginning of renewed trust in AMEP educators and a reduction in the burden of compliance.

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Dr Chris Corbel is a lecturer in the Master of TESOL and Master of Modern Languages Education courses in the Faculty of Education, University of Melbourne. He has over 50 years' experience as an adult EAL teacher, teacher-trainer, curriculum designer, and project manager in post-compulsory, vocational, and tertiary education, across the public, not-for-profit, and private sectors. His research focuses on the phraseology of education policy discourse.