



Horwath Consulting Ireland

in association with



and



Final Report to

**Office of the Minister for Integration and
the Department of Education & Science**

**Development of a National English
Language Policy and Framework for
Legally-Resident Adult Immigrants**

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EXECUTIVE SUMMARY

Introduction

1. The Office of the Minister for Integration (OMI), in conjunction with the Department of Education and Science (DES), commissioned an independent review to assist in the development of a national English Language policy and framework for legally-resident adult immigrants. Horwath Consulting Ireland, in association with Rambøll Management and Matrix Knowledge Group, were awarded the contract to undertake this assignment.
2. The terms of reference for the assignment state that: “proposed future developments will be governed by a clear strategy which reflects the importance of English language tuition in overall integration objectives and which addresses key coordination, technical, funding and service-delivery issues.”

Background

3. Irish society has seen a dramatic increase in the number of immigrants entering the country in recent years. Ireland's population of 4.17 million includes, according to the latest conducted census in 2006, approximately 420,000 immigrants (over 10% of the total population). According to the most recent CSO figures, of the 2.24 million members of the Irish labour force, non-Irish nationals accounted for 355,000 or 16% of the total workforce.
4. To address the wide and varied needs of legal immigrants entering Ireland in recent years, a range of governance structures and organisations have been established all with differing degrees of emphasis on meeting the English language needs of this diverse group of people.
5. The ability of immigrants to speak the host language is critical and learning the English Language is a key success factor to facilitate immigrants to integrate into society at social and economic levels.
6. This report set out to investigate how a strategy concerning English Language for legally resident adult immigrants might be created, implemented and managed and how key objectives required of it could be achieved.

Findings – International Review of Language Provision

7. The jurisdictions documented in this paper have put in place comprehensive policies and frameworks for Language Tuition. Most have facilitated the provision of subsidised or free language tuition regimes or where payment is expected, a percentage of the cost, may be recouped by the learner.
 - Most of the EU countries documented have mandatory language policies in place for non-EU immigrants and immigrants receiving welfare payments.
 - The majority of jurisdictions included in this study have established clear links between language courses and the integration of immigrants into the labour market.

- Most jurisdictions have developed their own broad curriculum for language courses but do not have prescribed course material/didactical material.
- Where there is a citizenship aspect as a component of the language framework this is generally developed by the State, to ensure the state's *imprimatur* runs through its content.
- The majority of jurisdictions studied have established clear links between language courses and the integration of immigrants into the labour market.
- Several countries facilitate immigrants to undertake internships in a work setting which leads them to deploy their language skills in a 'real-life' environment and also assists the immigrant with the wider overall integration process.

Findings – Written Submissions and Consultations

8. As part of the review process, meetings with representatives from over 30 organisations were conducted. Stakeholders were invited via the national print media to submit their written opinions about a future system for provision of English Language Tuition for legally resident adult immigrants in the Republic of Ireland. The main aspects which consultees addressed in their submissions, or during meetings with the consulting team, are as follows:
 - The vast majority of submissions welcome the development of a national English language policy, as the current system is not seen as appropriate, both in terms of organisational structure, and the quality and quantity of service provided.
 - Language tuition costs were felt to be prohibitive for those in entry level or unskilled positions which perpetuates immigrants not being able to gain the language skills required to move up to more rewarding positions of employment.
 - ELT currently lack common standards i.e., no standardised assessment of the immigrant's English language proficiency prior to entry, no standardised exam after completion of the course and no common teaching material.
 - Many immigrants are not maximising their earning potential because of their low standard of English and it was felt that an downturn in employment could leave some economically displaced immigrants vulnerable to long term unemployment.
 - It was felt that a new system should address the needs ranging from the immigrant with a high standard of education to those with a low educational attainment.
 - ELT should be practical in its focus in order to maximise its appeal to immigrants. The language student should be clearly able to see why they need the language tuition, i.e., to assist with integration, secure employment, to access state services and so on.
 - Resources directed at ELT will be recouped indirectly through a more integrated and confident immigrant population.
 - For there to be a link between citizenship and English Language proficiency then there would be a requirement for citizenship component within ELT modules.

Findings – Survey

9. A web-based survey carried out as part of the review with institutions that are either involved in the provision of ELT to immigrants in the Republic of Ireland or have an interest in the provision of ELT. There were 98 organisations (plus one individual) which participated in the survey, of these 78 respondents completed all of the survey questions.
 - Ireland's immigrant population is not a homogeneous one for whom a single solution will fit all of their requirements for English Language tuition. The analysis conducted indicates that there is a rich diversity of immigrant nationalities whose discrete ELT needs will need to be met.
 - The current numbers of courses provided may not be sufficient to meet the demand for English language tuition. ELT providers articulated the capacity for additional teaching capacity could be made available subject to clarity from the Government about sufficient funding to support the development and roll-out of this additional tuition capacity.
 - ELT should be combined with other course content, with especially strong support being given to combining language classes with education in carrying out essential administrative tasks necessary for communicating with authorities, filling out tax forms, accessing health care etc.
 - Reasons for not participating in, or failing to complete, an English Language course are primarily of a practical nature, such as cost, lack of spare time, lack of access to childcare facilities or lack of access to night-time or weekend courses. Cultural factors or a lack of perceived necessity were felt to play minor roles.
 - There is generally strong support for positive incentives and measures such as making access to language education a right, while the picture is more mixed when it comes to making language education mandatory or connecting language proficiency to citizenship (supported by a small minority) or right to seek employment (almost evenly split). A generally open system of language provision was considered to be a costly means to deliver language provision and should be reflected against the background of prevailing and future budgetary constraints.
 - There was strong support from respondents to the survey for some kind of support with the development of ELT programme content. The co-ordinating organisation will require a Government Department to act as its 'sponsor' and to whom it will be accountable.

Conclusion

10. There is a robust case for the development of a formalised English Language system and framework for legally resident immigrants in Ireland.
11. The acquisition of language skills has positive long-term benefits for immigrants:
 - Enhanced language skills leads to improved job opportunities

- There is a potential for higher earnings for those immigrants with a reasonable command of English
- EL competence by parents can lead to enhanced educational opportunities for 'second generation' immigrants.

Recommendations

12. It is recommended that adoption of English Language competence of A2/FETAC Level 3 equivalent is the accepted standard at which the student has a functional competence in the English Language as set out in the Common European Framework of Reference for Languages
13. It is recommended for the English Language system that 5,000 additional publicly funded places be provided. This would be a challenging but attainable number of publicly funded EL places to be provided by the VEC sector.
14. It is recommended that 200 hours of ELT is required for a beginner to reach A2 level of competence. This number of hours is taken as the best estimate of English Language competence for attainment of A2 /FETAC level 3.
15. Classroom based language provision is the approach widely used in most jurisdictions to equip immigrants with the necessary linguistic skills to enable them to function capably within society.
16. The English Language system and framework should be complemented by less formal teaching methods such as:
 - E-learning and conversation groups in libraries
 - Government-funded homepage with self-directed learning; podcasts etc
 - Courses offered on radio and TV-channels targeting the immigrant population
 - NGO involvement in informal tuition
17. An approach where 'class-room' tuition and supporting 'informal' methods of EL tuition are **combined** would be optimal as it would incorporate the rigour of formal delivery with methods such as aural, digital and print delivery. There would be a 'ripple effect' to the wider immigrant population from this material and this would leverage the spend on development of this material by reaching a wider audience than the classroom tuition participants.
18. The provision of 5,000 additional ELT places will not satisfy the demand from all immigrants, therefore it also recommended that there should be consideration given to the provision of tax relief to immigrants on ELT fees in line with tax relief provided to taxpayers regarding other educational-related fee outlay. This would encourage immigrants to participate where they receive a percentage of their fee spend back in the form of tax relief/credits.
19. The next steps in the formulation, development and implementation of the English Language system and framework represent a significant undertaking and will require financial/staffing resource to be made available to ensure that the constituent parts of the system and framework are fully considered and resourced.

1. CONTEXT FOR THE REVIEW

1.1 Preamble

The Office of the Minister for Integration (OMI), in conjunction with the Department of Education and Science (DES), commissioned this independent review to assist in the development of a national English Language policy and framework for legally-resident adult immigrants. Horwath Consulting Ireland, in association with Rambøll Management and Matrix Knowledge Group, were awarded the contract to undertake this assignment.

A Steering Group was established for the project, comprising representatives from the DES, OMI and FÁS. In addition, a Specialist Committee, comprising individuals from DES, OMI, Advisory Council for English Language Schools (ACELS), Integrate Ireland Language Training (IILT), Irish Vocational Education Association (IVEA), FÁS was appointed to advise the Steering Group on specialist technical areas.

A glossary of acronyms used in this document is included in Appendix 1.

1.2 Introduction

Irish society has seen a dramatic increase in the number of immigrants entering the country in recent years. Ireland's population of 4.17 million includes, according to the latest conducted census in 2006, approximately 420,000 immigrants (over 10% of the total population). According to the most recent CSO figures, of the 2.24 million members of the Irish labour force, non-Irish nationals accounted for 355,000 or 16% of the total workforce.¹

This continually changing population demographic offers considerable issues and opportunities for both immigrants and Ireland. This immigration has been welcomed but achieving the overall objective of an integrated and cohesive Irish society is not easily obtained. The ability of immigrants to speak the host language is critical to this achievement and learning the English Language is a key success factor to facilitate immigrants to integrate into society at social and economic levels. To address the wide and varied needs of legal immigrants entering Ireland in recent years, a range of governance structures and organisations have been established all with differing degrees of emphasis on meeting the English language needs of this diverse group of people.

OMI and partner Departments have taken stock from a policy perspective and have considered outline options and potential future strategies for the provision and delivery of National English Language Policy and Framework. The terms of reference for the assignment state that:

“proposed future developments will be governed by a clear strategy which reflects the importance of English language tuition in overall integration objectives and which addresses key coordination, technical, funding and service-delivery issues.”

¹ <http://www.cso.ie/statistics/Population.htm>

This assignment set out to investigate and analyse how such a strategy might be created, implemented and managed and how key objectives required of it could be achieved.

1.3 Summary Terms of Reference

As detailed in the terms of reference, the review should consist of the following activities:

Stage A: Consult with key stakeholders;

Stage B: Analyse existing research;

Stage C: Map existing stakeholders and services;

Stage D: Provide recommendations on the pedagogical approach to English language tuition for adult immigrants

Stage E: Identify all relevant issues arising from the review;

Stage F: Prepare a report with recommendations.

1.4 Structure of the Report

The material set out in this report is listed below;

Section 2 documents the Project Methodology and provides a summary of associated activities undertaken to meet the Terms of Reference

Section 3 contains a review of international English Language policies and frameworks

Section 4 contains a review of the Irish context relating to English Language policy and framework;

Section 5 contains the findings based on the written submissions received and consultations undertaken as part of this assignment

Section 6 contains the findings based on the questionnaire issued to stakeholders

Section 7 provides conclusions and recommendations which will inform the new English Language policy and framework.

1.5 ESOL Definitions

In adult education, the term **ESOL** is used to refer to situations in which English is being taught and learned in countries, contexts and cultures in which English is the predominant language of communication. ESOL programmes are learner-centred and needs based with attainable short-term goals.²

EFL/TEFL (English as a Foreign Language/Teaching English as a Foreign Language) are used in contexts where English is neither widely used for communication, nor used as the medium of instruction. It presumes learners already have literacy and are usually taught in the learner's mother tongue, frequently in private language schools. In EFL, accreditation mechanisms usually dictate course direction.

However, some commentators now argue that such a divide between the two groups of learners is not sustainable, nor does it address the diverse needs of the adult learners who request help with their English. Many refugees, asylum seekers and migrants now arrive with professional backgrounds, varied amounts of exposure to formal English learning and a desire to enter Higher Education, or to validate their professional qualifications and pursue their professional careers.³

The historical ESOL/EFL divide may be explained simply in monetary terms: the new 'ESOL' students come from communities who could not afford to access private tuition and so a separate sector was created, initially mainly through the literacy service which provides free access to all (see paragraph 4 below). However, in terms of language teaching, there is an issue for those students who are not literate in their first language. In this sense, the 'ESOL' approach may be more appropriate for this target group. But ESOL and EFL are more similar than different and training should reflect this. The focus should be on good quality provision encompassing best practice in second language teaching, which is adapted to meet the specific needs of the students.

1.6 Common European Framework of Reference for Languages

The Common European Framework of Reference for Languages: Learning, Teaching, Assessment, abbreviated as CEF or CEFR, is a guideline used to describe achievements of learners of foreign languages across Europe. It was put together by the Council of Europe as the main part of the project "Language Learning for European Citizenship" between 1989 and 1996. Its main aim is to provide a method of assessing and teaching which applies to all languages in Europe. In November 2001 a European Union Council Resolution recommended using the CEFR to set up systems of validation of language ability. The six reference levels (see below) are becoming widely accepted as the standard for grading an individual's language proficiency.

² ESOL is used in the UK to describe language teaching to all learners over the age of 16, while English as an Additional Language (EAL) is the accepted term for learners under 16 (**Adult ESOL Core Curriculum**, Basic Skills Agency, London, 2001.)

³ Barton, D. and Pitt, K., 2003, **Adult ESOL Pedagogy: a review of research**, National Research and Development Centre, London

Level	Description
A1	Can understand and use familiar everyday expressions and very basic phrases aimed at the satisfaction of needs of a concrete type. Can introduce him/herself and others and can ask and answer questions about personal details such as where he/she lives, people he/she knows and things he/she has. Can interact in a simple way provided the other person talks slowly and clearly and is prepared to help.
A2	Can understand sentences and frequently used expressions related to areas of most immediate relevance (e.g. very basic personal and family information, shopping, local geography, employment). Can communicate in simple and routine tasks requiring a simple and direct exchange of information on familiar and routine matters. Can describe in simple terms aspects of his/her background, immediate environment and matters in areas of immediate need.
B1	Can understand the main points of clear standard input on familiar matters regularly encountered in work, school, leisure, etc. Can deal with most situations likely to arise whilst travelling in an area where the language is spoken. Can produce simple connected text on topics which are familiar or of personal interest. Can describe experiences and events, dreams, hopes & ambitions and briefly give reasons and explanations for opinions and plans.
B2	Can understand the main ideas of complex text on both concrete and abstract topics, including technical discussions in his/her field of specialisation. Can interact with a degree of fluency and spontaneity that makes regular interaction with native speakers quite possible without strain for either party. Can produce clear, detailed text on a wide range of subjects and explain a viewpoint on a topical issue giving the advantages and disadvantages of various options.
C1	Can understand a wide range of demanding, longer texts, and recognise implicit meaning. Can express him/herself fluently and spontaneously without much obvious searching for expressions. Can use language flexibly and effectively for social, academic and professional purposes. Can produce clear, well-structured, detailed text on complex subjects, showing controlled use of organisational patterns, connectors and cohesive devices.
C2	Can understand with ease virtually everything heard or read. Can summarise information from different spoken and written sources, reconstructing arguments and accounts in a coherent presentation. Can express him/herself spontaneously, very fluently and precisely, differentiating finer shades of meaning even in more complex situations.

2. PROJECT METHODOLOGY

2.1 Introduction

The following section contains an overview of the approach taken to conduct the review, to summarise we list below the activities undertaken;

- Three strands to the consultation process with stakeholders;
 - Written submissions,
 - Face to face Consultations
 - Questionnaire.
- Analysis of existing research and secondary data research;
- Mapped existing stakeholders and services including financial and structural arrangements;
- Identified all relevant issues arising from the above activities;
- Guidance on educational approaches;
- Analysis and reporting;
- Final report with conclusions and recommendations.

We document below some additional detail on the stakeholder consultation process.

2.2 Data-Gathering Activities

To achieve as broad a view as possible the consulting team has engaged in a multi-pronged consultative approach. Key stakeholders were interviewed, focus group meetings were arranged, and to expand the process a survey with key informants was carried out (as set out in Section 2.4.2 below).

2.3 Invitation for Submissions

This section documents the consultation process carried out with a wide range of stakeholders, who were invited via press advertisements to submit their opinions about a future system for the provision of English language tuition for legally resident adult immigrants in the Republic of Ireland.

2.4 Stakeholder Consultation

2.4.1 Introduction

As part of the Review direct consultations were held with a wide range of stakeholders, as listed below:

Advisory Council for English Language Schools	Hibernia College
Blanchardstown Area Partnership	Immigrant Council of Ireland
Central Statistics Office	Integrate Ireland Language and Training
City and Guilds Ireland	Irish Business and Employers Confederation
County Dublin Vocational Education Committee	Irish Congress of Trade Unions
Department of Community, Rural and Gaeltacht Affairs	Irish Vocational Education Association
Department of Education and Science	Jesuit Refugee Centre
Department of Enterprise, Trade and Employment	Immigrants Rights Centre
Department of Health and Children	MEI RELSA (Language School Representative Body)
Department of Justice, Equality and Law Reform	Minister for Integration, Conor Lenihan TD
Dublin Polish Chaplaincy	National Adult Literacy Agency
Economic and Social Research Institute	Pobal
Embassies: Indian, Chinese, Philippine, Polish	Reception and Integration Agency
Students attending Language Schools	Small Firms Association
Foras Áiseanna Saothair (FAS)	SPIRASI (Non-Governmental Org.)
Farrell Grant Sparks	Vincentian Refugee Centre
Further Education and Training Awards Council	Wexford Vocational Education Committee
Health Service Executive	

Findings arising from this process are described in more detail in Chapter 5.

2.4.2 Questionnaire Development

A survey questionnaire was developed to cover the necessary areas relating to inputs and outcomes from the industry perspective. This survey sought to obtain the views of interest groups and providers of English language tuition to adult immigrants.

A draft questionnaire was sent to the Steering Group for their comments and then finalised the draft prior to issue. The questionnaire was designed to be straightforward for respondents to complete.

The views received have been analysed and documented in Section 6. The analysis was used to inform the policy and framework development process.

3. INTERNATIONAL REVIEW OF LANGUAGE PROVISION

3.1 Introduction

In this chapter the language systems in a selection of Northern European countries, Canada and New Zealand are described; these countries are regarded as highly relevant jurisdictions for comparison and research purposes. In general, the national policies documented below are targeted at approaches aimed at compulsory Language Tuition provision for non-EU immigrants who must comply with the approach of the individual jurisdiction. This is, of course, not directly analogous to Ireland's situation where the majority of immigrants are of EU origin and cannot be mandated to undertake English Language Tuition(ELT).

The eight countries whose language policies and frameworks were investigated as part of this study are listed below:

- United Kingdom;
- Austria;
- Denmark;
- Germany;
- Netherlands;
- Sweden;
- Canada;
- New Zealand.

We document our findings under the following criteria:

1. Background and Legal Framework;
2. Organisational Structure of Language Provision;
3. Financing of the Language Courses;
4. Quality Assurance and Controlling;
5. Incentive Structures and Sanctions;
6. Course Contents and Pedagogical Approaches;
7. Integration into the Labour Market.

We have summarised the main features of the international systems below and in Appendix 2 we have included a more detailed summary of the features set out in this chapter.

3.2 United Kingdom

3.2.1 *Background and Legal Framework*

The United Kingdom (UK) population of 61 million includes, according to the latest conducted census in 2001, approximately 5 million immigrants (over 8% of the total population).⁴ The UK reformed its integration system by introducing a point system which came into force at the end of February 2008 in order to restrict immigration focusing especially on labour migration. **These regulations impact primarily on non-EU citizens who are immigrating to the UK.**

3.2.2 *The Organisational Structure of Language Provision*

Non-EU immigrants who are already in the UK or have arrived recently, have to pass the Life in the UK Test to be eligible for a permanent resident permit.

If the immigrant does not have the required proficiency level in English to take the Life in the UK Test (ESOL 3), the immigrant can take English for Speakers of Other Languages (ESOL) courses in schools and centres which are situated all over the UK. The immigrant has to prove that they moved up one ESOL level in order to be eligible for a permanent residence permit.

3.2.3 *Financing of the Language Courses*

English language courses receive public funded of €397 million by the Department of Innovation, Universities and Skills (DIUS). However, as English language enrolments have tripled in the last number of years and government spending has difficulty in keeping up with the increase in demand, the DIUS has recently engaged in consultation on the future funding system of English language tuition.

3.2.4 *Quality Assurance and Controlling*

The Qualification and Curriculum Authority (QCA) produces annually standard reports which monitor the performance and the outcomes of the accredited bodies. Additionally, the QCA assures via its accreditation the necessary quality for the English language courses.

3.2.5 *Incentive Structures and Sanctions*

For all non-EU immigrants who want to settle permanently in the UK, an English language course or a Life in the UK Test is mandatory. Consequently, the granting of a permanent residence right is a legal and financial (cost of renewal of a temporary residence permit) incentive for the respective immigrant to participate in an English language course or to take a Life in the UK Test. Furthermore, an English language course or the Life in the UK Test is a prerequisite for naturalisation.

⁴ Home Office (2008), <http://www.homeoffice.gov.uk/passports-and-immigration/immigration/>, accessed 20.2.08

3.2.6 Course Contents and Pedagogical Approaches

The curriculum of the English language courses promotes the qualification of the immigrant in all 4 modes: speaking, listening, reading and writing. The content of the curriculum has been developed by the QCA in cooperation with the DIUS. Additionally, the curriculum also includes contents regarding culture and life in the UK. The courses end with an exam conducted by one of the accredited bodies of the QCA.⁵

There is no official prescribed English language course material, although the material used is partially determined by the exams of the accredited bodies.

The Life in the UK Test consists of 24 random multiple-choice questions, and examine the immigrant's knowledge of culture, politics and life in the UK.⁶ The Life in the UK Test can be repeated until it is passed.

3.2.7 Integration into the Labour Market

From the 29th February 2008 the point system discussed above will be phased in linking the admission of an immigrant to the labour market needs of the UK (see above). Moreover, a new range of English language courses was introduced in September 2007, namely ESOL for Work Qualifications courses. These offer shorter, more work related English programmes for skilled immigrants.

3.3 Austria

3.3.1 Background and Legal Framework

The population of Austria is approximately 8.2m. Immigrants total approximately 0.47m, or 5.8% of the entire population.

Austria's alien law was amended in 2002 making language courses mandatory for new non-EU immigrants in possession of a residence permit.

3.3.2 Organisational Structure of Language Provision

The Austrian integration system is based upon a voucher system. The central agency for administering the voucher system and the integration system in general is the Austrian Integration Fund, which is financed by the Federal Ministry of the Interior. The Austrian Integration Fund is responsible for the certification and evaluation of the private and public course providers.

After the immigrant's arrival, the course provider conducts a language proficiency test. On the basis of this test the course provider determines the required number of hours the immigrant needs to reach the target level of A2⁷ and notes this on the voucher. The results of the proficiency test have to be notified to the Austrian Integration Fund.

⁵ Learning and Skills Council (2007), <http://readingroom.lsc.gov.uk/Lsc/2006/funding/streams/nat-fundingguidanceforfe200607-pu-apr2006.pdf>

⁶ Home Office (2007), *Knowledge of Life in the UK*.

⁷ Please refer to Section 1 – EU Language Framework of Competence for definition of A1, A2 etc levels.

The language courses are divided into 5 modules of 60 hours after which a language proficiency of A2 should be reached. The maximum hours available are 300 hours, with an additional amount of 75 hours for persons with a 'low educational background'. All courses end with a standardised mandatory test designed by the Austrian Integration Fund.

3.3.3 *Financing of Language Courses*

The whole language course is pre-financed by the participant who pays the course provider directly. The cost for a language course is set by each course provider individually and varies between €300 and €1,800. If the immigrant concludes the integration course within two years, the Austrian Integration Fund, after having received the voucher from the course provider, refunds 50% of the course fee to the immigrant up to a maximum of €2.50 per hour of teaching.

3.3.4 *Quality Assurance and Controlling*

There is no quality assurance system in place. Course providers are instructed to conduct internal evaluations but are not obliged by law to do them.

3.3.5 *Incentive Structures and Sanctions*

As mentioned above the main incentive for the immigrant to complete the course within the given timeframe is the possible refund of fees from the Austrian Integration Fund.

The successful completion of a language course facilitates the granting of a permanent residence permit. To be granted Austrian citizenship a successfully completed integration agreement is a necessary precondition.

In the case of non-attendance at a language course within the framework of an integration agreement, a fine of €200 is levied (after multiple warnings). If there is further non-compliance, the residence permit can be withdrawn.

3.3.6 *Course Contents and Pedagogical Approaches*

The Austrian Integration Fund provides a mandatory framework curriculum. However, course providers can place different emphases within the curriculum.

The course material and teaching approaches are left to the discretion of the teachers of the course providers who generally adjust their teaching to the classes' needs.

Language proficiency test content is left to the discretion of the course providers.

3.3.7 *Integration into the Labour Market*

The integration of the immigrant into the labour market is an indirect aim of the integration courses and not their official objective. Therefore, there are no specific measures integrated into the language course. Nevertheless, the language courses within their curriculum teach employee rights and the role of trade unions in Austria.

3.4 Denmark

3.4.1 Background and Legal Framework

The population of Denmark is approximately 5.5m. Immigrants made up 477,000 or 8.8% of the entire population (January 2007).

In 2004 the Danish parliament adopted legislation regarding Danish language courses for non-EU immigrants, which regulates the supply of Danish courses for immigrants, refugees and other relevant groups.

3.4.2 Organisational Structure of Language Provision

Municipalities are responsible for the licensing procedure and control of the language providers. However, the Danish Ministry of Integration (The Ministry) regulates the provisions determining the number of language providers and the supply of language provision in general as well as the examinations and their accreditations procedures. Additionally, the accreditation of teachers is regulated via a university degree which language teachers must possess to conduct language classes. The supervision of the qualifications of the teachers resides with the course providers.

3.4.3 Financing of Language Courses

The introduction programme is financed by the Danish State via a refund scheme with the municipalities. The Danish State refunds 75% of the introduction allowance to the municipalities.

3.4.4 Quality Assurance and Controlling

In Denmark quality assurance and control takes place through performance measurement of each single course provider as well as through centrally organised examinations run by the Danish State.

3.4.5 Incentive Structures and Sanctions

Course providers and municipalities receive financial incentives to promote courses. As an incentive for immigrants the support requirement for family reunification is halved on completion of a Danish language course and a Danish language course is a pre-condition for a permanent residence permit in Denmark. Sanction for immigrants for non-attendance at a course is denial of a permanent residence permit and a reduction of 30% of the introduction allowance for the participants in the introduction programme.

3.4.6 Course Contents and Pedagogical Approaches

The curriculum for the language courses has to incorporate specific topics which are prescribed by the Ministry, such as, everyday life, the local city, work and education, Denmark today and yesterday, democracy and the welfare state,

labour market and work culture, employment, job hunting and information sources.

3.4.7 Integration into the Labour Market

Measures for integration into the labour market, within the context of the introduction programme, consist of three aspects:

1. **Counselling and Qualification:** The qualifications of the immigrant are assessed and the immigrant receives information regarding the Danish labour market.
2. **Internships:** The immigrant undertakes an internship within a company, aimed at developing their professional, linguistic and 'social' competences.
3. **Subsidised Employment:** The immigrant receives a job, which is subsidised for a year in order to assist their integration process into the wider labour market.

3.5 Germany

3.5.1 Background and Legal Framework

In 2006 Germany's population was approximately 82.3m of which 6.75m or 8.2% were of foreign origin.

In general attendance at language courses is voluntary. However, three groups of persons can be obliged to participate in language courses:

1. Non-EU immigrants who do not possess a sufficient language proficiency in German (meaning that they cannot communicate without the help of a third person)
2. Immigrants who receive welfare benefits
3. Non-nationals who are in "need for integration" (e.g. parents of small children who cannot communicate in German). This can be EU or non-EU immigrants and cases are determined as these categories of immigrants make contact with services of the State.

3.5.2 Organisational Structure of Language Provision

The *Bundesamt für Migration und Flüchtlinge* (Federal Agency for Migration and Refugees (BAMF)), which is financed by the Ministry of the Interior, is responsible for the accreditation of the course providers.

Since 1st January 2008, German language courses consist of a 600-hour language course and a 45-hour citizenship course.

The target level for all language courses is B1. The target level is tested through a standardised examination, which has been developed by the Goethe Institute in association with the BAMF.

3.5.3 Financing of the Language Courses

The BAMF pays each course provider the following rates:

- €2.05 per hour for each participant of a language course;
- €12.50 for each conducted language proficiency test;
- €7 administrative charge per course participant;
- €44.65 for each conducted language exam per participant;
- €5 for each conducted civic exam per participant.

However, immigrants generally must pay a contribution of €1 per course hour to the BAMF.

3.5.4 Quality Assurance and Controlling

The BAMF operates quality assurance and controlling systems for the course providers and participation by immigrants on language courses.

3.5.5 Incentive Structures and Sanctions

For all immigrants who successfully complete the language and civic course the necessary residence time in order to be naturalised is reduced from eight to seven years. Furthermore, a successfully completed language and civic course is an influential criterion for granting a permanent residence permit to immigrants or non-nationals.

3.5.6 Course Contents and Pedagogical Approaches

The teaching methods and the content of the language and civic courses are left to the discretion of the course providers. However, the BAMF has issued recommendations with regard to all aspects of the language and civic courses.

3.5.7 Integration into the Labour Market

The goal of the language and civic courses in Germany is to familiarise immigrants with the German language as well as German culture, history, etc. The courses are mainly viewed by the employment agencies as a stepping-stone for further vocational training.

3.6 The Netherlands

3.6.1 Background and Legal Framework

The population of the Netherlands is approximately 16.6m, of whom 4.3% are immigrants. Each of the 12 provinces of the Netherlands is divided by municipalities; there are 443 municipalities in total.

The Dutch parliament passed the “*Wet Inburgering Nieuwkomers*” (WIN) law, which obliged new non-EU immigrants to participate in integration agreements and programmes.

According to the new WIN all newly arriving non-EU immigrants and all non-EU immigrants, who do not have an eight-year Dutch school education and are aged between 16 and 65 years, are obliged to take a language course. The language courses consist of 750 hours for those learners with a low educational background and 450 hours for more advanced learners.

3.6.2 The Organisational Structure of Language Provision

The core of the Dutch integration system is a database which is administered by the *Informatie Beheer Groep* (IB-Groep). The database consists of data relating to all immigrants in the Netherlands including their place of residence.

3.6.3 Financing of the Language Courses

The Dutch financing system for language courses focuses on the immigrant who has to finance their own language course. According to current estimates, the cost of a language course amounts on average to €6,000 per participant. Refunds are available, please see Section 3.6.5 below.

3.6.4 Quality Assurance and Controlling

There is no systematised quality assurance and controlling system in place.

3.6.5 Incentive Structures and Sanctions

Immigrants who successfully complete their language courses within the prescribed time period are eligible to a refund of 70% of their cost (to a maximum of €3,000) from the Dutch State.

Furthermore, the municipalities can impose financial fines on immigrants if they do not honour their obligations.

3.6.6 Course Contents and Pedagogical Approaches

The teaching methods and course material are left to the discretion of the course providers. However, the municipalities have some influence on the course content and teaching methods, as they are buying these courses on the open market.

3.6.7 Integration into the Labour Market

Municipalities generally purchase courses which operate a so-called dual system combining languages courses with internships in order to integrate the participants into the labour market.

3.7 Sweden

3.7.1 Background and Legal Framework

Sweden's population is approximately 9m. Immigrants constitute 5.4% of the population.

In 2001 legislation on integration incorporated new legislation on citizenship. This legislation permitted the recognition of dual nationalities, and established performance management methods underpinning the financing of language course at national and municipal levels

3.7.2 The Organisational Structure of Language Provision

The supply of language courses is driven by municipal language centres, which specialise in the provision of vocational training.

Accreditation of teachers is within the responsibility of the language course suppliers, which notify the municipality about the teacher's qualification.

The course system is based upon an individual introduction programme, which takes the form of a contract between the municipality and the immigrant. Within this introduction programme the municipality and the immigrant agree upon the required counselling and course. The immigrant must choose a language provider on its own and must notify the municipality of this decision.

All courses are free of charge and have a duration of 525 hours. All Swedish for Immigrant (SFI) courses conclude with a national standardised examination, which tests if the participants have reached the stated objective of B1 in language proficiency.

3.7.3 Financing of the Language Courses

Course providers are paid for the hours which an immigrant participates in the course.

3.7.4 Quality Assurance and Controlling

There is no existing quality assurance system in place.

3.7.5 Incentive Structures and Sanctions

Immigrants who are obliged to take SFI courses will have concluded an introduction programme with their municipality. The immigrant's introduction allowance (financial support for the immigrant paid for by the municipality) can be reduced if the immigrant does not participate in the course.

3.7.6 Course Contents and Pedagogical Approaches

The course content is regulated by a national curriculum, which focuses on language proficiency.

There are no official standards in place regarding the use of didactical methods and material.

3.7.7 Integration into the Labour Market

Integration of immigrants into the labour market is one of the top priorities of the Swedish integration system. There are municipal differences, in Malmö course providers must provide participants with an internship, course providers in Stockholm do not have to provide internships.

3.8 Canada

3.8.1 Background and Legal Framework

The population of Canada is approximately 33.4m. Its 6.2m immigrants represent 18.5% of the Canadian population.

The Immigration and Refugee Protection Act (IRAP) in 2002 streamlined the previous Immigration Act to enable Canada to better attract workers with flexible skills and to speed up family reunification.

3.8.2 Organisational Structure of Language Provision

The Canadian government in cooperation with provincial governments, school boards, community colleges and immigrant-serving organisations offers free and voluntary language courses to adult permanent residents. To be eligible, the immigrant must be a permanent resident of Canada or a refugee, be older than 17 years and have their language abilities evaluated by a Canadian Language Benchmark Assessment Centre (CLBA). Generally, a sufficient supply of courses is guaranteed as public providers cover the basic supply while private providers provide needed courses aimed at specific target groups.

3.8.3 Financing of the Language Courses

As mentioned above, course providers receive rolling annual funding via the provincial administration to provide courses. The details of the funding procedures vary between the provinces. Course providers work to different administrative procedures in each of Canada's provinces.

3.8.4 Quality Assurance and Controlling

Quality assurance is overseen via an information exchange between the provinces with regard to the content and quality of the providers. There is no standardised quality assurance system or controlling system in place.

3.8.5 Incentive Structures and Sanctions

There are no financial incentive or sanctions in place. The main incentive in place is the citizenship test for which the immigrant has to speak French or English and has to be familiar with Canadian society, history, etc.

3.8.6 Course Contents and Pedagogical Approaches

The curriculum for Language Instruction for Newcomers to Canada (LINC) courses is determined by provincial standards but as stipulated by the Ministry of Citizenship and Immigration should be rich in orientation information and should teach the full range of language skills.

Methods and didactical approaches are left to the discretion of the course providers.

The content of the language proficiency test by the CLBA Centres is standardised and tests the language skills of the immigrant.

3.8.7 Integration into the Labour Market

The Immigration Settlement and Adaptation Program (ISAP) Program is responsible for integrating immigrants into the labour market by providing immigrants in need of higher levels of language training with the relevant tuition to enable them to obtain a position commensurate with their qualifications.

3.9 New Zealand

3.9.1 Background and Legal Framework

New Zealand's population is 4.1m, of which almost 22% have been born in another country.

In 2004 the New Zealand government started the "New Zealand's Settlement Strategy", a reform which systematised the language programmes and introduced quality assurance mechanisms. The strategy's aim is to enable immigrants to become confident in using English in New Zealand, and to access language support and information services.

New Zealand's Tertiary Education Commission offers courses to immigrants who want to migrate to New Zealand. If they do not possess an International English Language Testing System (IELTS) score of seven or above, immigrants have to take and pay for a language course from the Tertiary Education Commission in order to migrate to New Zealand.

3.9.2 Organisational Structure of Language Provision

The New Zealand Qualification Authority (NZQA) offers a well-developed Home Tutor scheme. The Ministry of Education pays for the education of the tutors who either teach individual classes in the home of the immigrant or teach English voluntarily in 'Social English Groups'. In 2006 approximately half of the

immigrants who received tuition received home classes while the other half received English classes in Social Groups.

The courses of the Tertiary Education Commission are offered within their nationwide facilities and have to be paid by the immigrant. The courses vary in duration and amount of hours according to the need of the immigrant.

3.9.3 *Financing of the Language Courses*

The Ministry of Education allocates resources to New Zealand's Adult English language programme to the Tertiary Education Commission which provides the courses. The costs of the courses of the Tertiary Education Commission are paid for by the immigrant.

The New Zealand government allocates resources to its Career and Labour Market Information programme, Adult English language tuition and to English language tuition in schools.

3.9.4 *Quality Assurance and Controlling*

There is currently no officially sanctioned quality assurance system in place although *ad-hoc* evaluation and monitoring systems are scheduled and earmarked in the respective budgets.

3.9.5 *Incentive Structures and Sanctions*

Immigrants must either have a stipulated level of English language skill to obtain a residence visa/ permit, or a long-term business visa or they must take lessons to attain this standard in order for their application for residence to be processed.

3.9.6 *Course Contents and Pedagogical Approaches*

Course content varies but is limited to English grammar, pronunciation, writing, etc. Topics such as New Zealand's culture or society usually play a secondary role. An exception is the English language National Home Tutor Scheme, which also teaches immigrants about New Zealand's culture, society, history and politics.

There are no centrally stipulated teaching methods and supporting material.

3.9.7 *Integration into the Labour Market*

Courses are primarily focused on integrating immigrants into the labour market. All courses aim at the improvement of English proficiency levels but they are not combined with internship programmes or similar measures.

3.10 *Main Features Summary*

We have summarised the main features of the international systems in Table 3.10 below, this is followed at the end of this section by review of the key

features of selected international language policies/frameworks and lessons applicable to an Irish situation.

Appendix 2 includes a detailed summary in tabular format of the key language policy and framework features set out in this chapter.

	Background & Legal Framework	Organisational Structure of Language Provision	Financing Language Courses	Quality Assurance and Controlling	Incentive Structures and Sanctions	Course Contents and Pedagogical Approaches	Integration into the Labour Market
United Kingdom	For defined categories of immigrants, introduced a point system, in order to control immigration	Centralised	Government	Yes	Language course prerequisite for naturalisation No sanctions	Curriculum developed by Qualifications and Curriculum Authority	No
Austria	Non-EU Immigrants obliged to attend language course	Voucher Approach 300 hours tuition – A2	Immigrant pays	None	% cost refunded Fines levied for non-completion	Teachers discretion	No
Denmark	Non-EU Immigrants obliged to take a 3 year 'Introduction programme'	Decentralised	Government	Yes	Family reunification halved Reduced introduction allowance	Ministry gives recommendations	Yes
Germany	Specific groups obliged to attend language course	The Federal Agency for Migration and Refugees (BAMF) 600 hours tuition – B2	Government	Yes	Nationalisation period reduced Reduce Welfare benefits for non-attendance	Course providers discretion	No

	Background & Legal Framework	Organisational Structure of Language Provision	Financing Language Courses	Quality Assurance and Controlling	Incentive Structures and Sanctions	Course Contents and Pedagogical Approaches	Integration into the Labour Market
Netherlands	Obligation on non-EU immigrants who do not have an 8 year Dutch education to take a language course	Database 450 hours tuition – B2	Immigrant pays	None	% cost refunded Fines levied for non-completion	Course providers discretion	Yes
Sweden	Immigrants who receive an introduction allowance or apply for asylum are obliged to take a language course.	Decentralised 525 hours – B2	Government	None	No incentive structure Reduced introduction allowance	Not centrally stipulated	Some areas
Canada	Family members must support relatives who wish to settle in Canada	Host-Program and the Immigrant Settlement and Adaption Program	Government	None	No incentive structure	Course providers discretion	No
New Zealand	3 programmes: Career & Labour Market Information, Adult ELT and ELT in Schools.	Centralised	Government	None	No incentive structure	Not centrally stipulated	Yes

Table 3.10 – Main features of International Language Systems

3.11 Summary of Findings

3.11.1 Introduction

The main findings from the international case studies are set out using the criteria listed below:

- Background and Legal Framework;
- Organisational Structure of Language Provision;
- Financing of the Language Courses;
- Quality Assurance and Controlling;
- Incentive Structures and Sanctions;
- Course Contents and Pedagogical Approaches;
- Integration into the Labour Market.

3.11.2 Background and Legal Framework

Most of the EU countries we have documented above have mandatory language policies in place for non-EU immigrants and immigrants receiving welfare payments. However there is little scope to mandate EU immigrants attending language classes in an EU jurisdiction where they are participating economically.

3.11.3 Organisational Structure of Language Provision

In general, most countries have developed and set up formalised systems to administer their language policy and framework. For example, they have invested in infrastructure required for overseeing language providers, accrediting teachers, organising payment for classes and so on.

3.11.4 Financing of the Language Courses

The jurisdictions documented in this paper have put in place comprehensive policies and frameworks for Language Tuition. Most of these facilitate the provision of subsidised or free language tuition regimes or where payment is expected, a percentage of the cost, may be recouped by the learner. The administration which is involved in tracking expenditure and receipts from immigrant learners indicates that there is an incentive to make any system as free from bureaucracy as possible, to minimise overheads and to maximise the effectiveness of spending on language tuition.

3.11.5 Quality Assurance and Controlling

The approach taken in jurisdictions ranges from a strict quality assurance regime located centrally to oversee providers to, on the other hand, the adoption of a very minimalist approach in which the government empowers the language provider industry to oversee its own quality assurance standards.

3.11.6 Incentive Structures and Sanctions

Most jurisdictions mandate the process whereby immigrants seek citizenship/naturalisation/residency permits be linked to the acquisition of a defined standard of competence in the first language of the jurisdiction. There are incentives provided generally to accelerate the above process for the immigrant or financial sanctions applied which discourage immigrants from non-attendance/non-completion of language courses.

3.11.7 Course Contents and Pedagogical Approaches

Most jurisdictions have developed their own broad curriculum for language courses but do not have prescribed course material/didactical material. This equips course providers with scope to develop/adapt tailored material for students. Where there is a citizenship aspect as a component of the language framework this is generally developed by the State, to ensure the state's imprimatur runs through its content.

Language competence testing approaches within jurisdictions are generally standardised to maintain the integrity of the system. There is a requirement to put in place basic security safety mechanisms to ensure that the person taking the language test is bona-fide.

3.11.8 Integration into the Labour Market

The majority of jurisdictions illustrated below have established clear links between language courses and the integration of immigrants into the labour market. Indeed, some countries facilitate immigrants to undertake internships in a work setting which leads them to deploy their language skills in a 'real-life' environment and also assists the immigrant with the wider overall integration process.

3.12 International Language Systems and Frameworks - Lessons for the Irish context

3.12.1 Introduction

Jurisdictions chosen for this analysis have all invested to a greater or lesser degree in the organisational capability necessary to administer the structure for language provision, the financing of language courses and in providing the core curriculum upon which courses are based. To assist with the process of developing the most suitable English Language policy and framework options for the Irish context, international insights set out above can be used to best focus on how Ireland's policy can be enhanced by incorporating best practise from these countries. There are successful components from other jurisdictions' language policies and frameworks which can be adapted for use in Ireland so that we learn from the experience abroad and do not "re-invent the wheel" where this does not add value.

We document below the key aspects from each national system which can inform the development of the Irish language system and framework;

3.12.2 United Kingdom

For non-EU immigrants a key factor taken into account when an application for permanent residency permit is made is that the immigrant has reached a defined standard of English language competency. Consequently, the granting of a permanent residence right is a legal and financial (cost of renewal of a temporary residence permit) incentive for the respective immigrant to participate in an English language course or to take a Life in the UK Test.

This codified approach to linking the immigrant's language skills and permanent residence provides a strong impetus on the part of the immigrant to attain the stipulated level of competence.

3.12.3 Austria

The Austrian language system is based on the principle that the average learner will require around 300 hours of language tuition to reach A2. The immigrant must fund this tuition up-front from their own resources. When the immigrant is deemed to have progressed satisfactorily then there is a 50% refund of fees from the state. The successful completion of a language course facilitates the granting of a permanent residence permit. To be granted Austrian citizenship a successfully completed integration agreement is a necessary precondition.

The Austrian system demonstrates that placing the onus on the immigrant to learn the language and to pay for this up-front (with the possibility of a partial refund) can be a powerful motivating factor to encourage attendance at language tuition.

3.12.4 Denmark

Denmark mandates non-EU immigrants to pursue Danish language courses. The main sanction for immigrants for non-attendance on language courses is denial of a permanent residence permit and a reduction in financial supports available to immigrants.

The Danish system specifically links language progression by the immigrant with permanent residence and provides financial incentives to those immigrants who successfully progress to the mandated language competence. In addition the Danish Ministry for Integration has a supervisory role over language schools and in such matters as accreditation and the oversight of language examinations.

3.12.5 Germany

The German language system is based on a target level of B1 language competence and therefore 600 hours of tuition is assumed to be required of the immigrant to attain this level. Tuition is heavily subsidised by the German government. Permanent residency applications by immigrants must demonstrate class attendance and progression in the language to defined levels of competence.

Germany expects non-EU immigrants to attain a relatively advanced level of competence in the language and places an onus on the immigrant through inexpensive tuition to achieve the language standard required to facilitate a successful residence application.

3.12.6 Netherlands

The Dutch language system requires the immigrant to participate in between 450-750 hours of Dutch language tuition which is funded up-front by the immigrant. This places a significant onus on the immigrant to successfully complete the language course. Generous partial refunds are made by the municipalities on successful completion of examinations which test the language competence of the learner.

The motivation of the immigrant is enhanced through the investment of their own financial resources in language tuition with the incentive of partial refunds further providing a stimulus to reach the stipulated level of competence mandated by the state.

3.12.7 Sweden

The immigrant can avail of over 500 hours of free language tuition which leads to a B1 language proficiency competence. However there is the possibility of punitive action by the municipality in terms of benefits reduction should the immigrant not participate in language tuition. Language is a factor which is considered when deciding on citizenship applications.

The Swedish system is resource intensive for the state as it pays for the tuition up-front with sanction possible for non-compliance by immigrants. However the immigrant has a considerable incentive to comply should they wish to gain citizenship.

3.12.8 Canada

Canada has a well resourced 'free' system of language tuition for eligible immigrants and has measures in place to assist immigrants who require advanced language for employment purposes.

There is a language competence requirement for citizenship applications which mandates English/French standards which need to be met by the immigrant.

3.12.9 New Zealand

New Zealand has strict rules about language competence which must be adhered to prior to an immigrant receiving a positive decision on their residence application.

The onus is placed on the immigrant to ensure that they have the necessary standard of English to satisfy the immigration authorities but also to maximise integration and to ensure that immigrants have the language skills to access services.

4. THE IRISH CONTEXT

4.1 Introduction

This section provides data on a number of areas which are of key significance to the context of the development of the proposed national English language policy and framework, including:

- **Immigration – Background Context;**
- **The EU, Council of Europe and OECD;**
- **National Policy;**
- **National Action Plan Against Racism;**
- **National Action Planning;**
- **National Legislative Context;**
- **The Reception and Integration Agency;**
- **The Office of the Minister for Integration;**
- **Government Organisations and Policy Delivery;**
- **Workforce Training;**
- **English Language Provision;**
- **Key Organisations;**
- **Qualifications and Standards; and**
- **Interpreting and Translation Services.**

4.2 Immigration – Background Context

Significant immigration is a recent development for Irish society. A weak economy (characterised by high levels of unemployment) and Ireland's geographic location meant that Ireland has traditionally been a country of emigration rather than immigration.

Ireland's participation in the European Community (EC) since 1973 meant that significant numbers of immigrants could have come to reside and work in Ireland. However, immigration from Member States remained relatively low until the mid-1990s, when Ireland's economic performance started to improve. Since the mid-1990s, immigration has increased significantly – initially driven by Irish people returning, and then by a wider range of EU citizens, people from around the world, including asylum seekers / refugees. It should be noted that asylum seekers comprise a very small minority of the overall immigrant community in Ireland in 2008. In 2002, there were 11,634 applications for asylum but this decreased to 3,985 in 2007.

Since 2000, the number of immigrants arriving into Ireland each year has consistently exceeded 50,000, with a significant increase in immigration in 2005 and 2006.

The Irish Government had estimated that another 400,000 immigrants would be needed in the coming years to sustain economic development. This estimate, however, may need to be tempered in the light of economic developments which could result in a reduction in immigration due to less favourable employment prospects in Ireland for migrants. Table 4.2.1 sets out recent immigration flows.

	UK	Rest of EU (EU-15)	EU 10	United States	Rest World	of	Total
2001	20,600	10,300	-	6,700	21,500		59,000
2002	19,100	11,300	-	6,600	29,900		66,900
2003	13,500	9,700	-	4,700	22,500		50,500
2004	13,000	12,600	-	4,800	19,700		50,100
2005	13,800	8,900	26,200	4,300	16,800		70,000
2006	15,500	10,700	37,400	3,500	19,800		86,900

Table 4.2.1 : Immigration to Ireland classified by World Regions⁸

There has been approximately a fivefold rise in inward migration from 17,200 in 1987 to almost 87,000 in 2007 and, during the past decade, over half of Ireland's population growth can be attributed to immigration. Over the next decade, the Central Statistics Office projects an increase in the population of between 437,000 and 686,000. Immigration could contribute 150,000 to 300,000 of this figure.⁹

Table 4.2.2 illustrates, using the 2006 census data, the most populous non-Irish national groupings*. From this data, it could be noted that up to 70% of immigrants could need assistance with English language acquisition. It is likely that the remainder, predominantly from the UK, would not require such assistance.

⁸ http://www.workpermit.com/news/2006_06_01/europe/irish_immigration_record.htm

⁹ Migration Policy September 2006 Published by the National Economic and Social Council

Population Category	Total	Percentage of Total Population
Total Population	4,172,013	100%
Irish Population	3,706,683	89%
Non-Irish population	419,733	10%
Not stated	44,729	1%
UK	112,548	27% of non-Irish pop.
Other EU States	163,227	39% of non-Irish pop.
Poland	63,276	15%
Lithuania	24,628	6%
Latvia	13,319	3%
Czech Rep.	5,159	1%
Rest of Europe (Non-EU)	24,425	6% of non-Irish pop.
Romania	7,696	2%
Non-EU States		
Asia	46,952	11% of non-Irish pop.
China	11,161	3%
Philippines	9,548	2%
India	8,640	2%
Africa	35,326	8% of non-Irish pop.
Nigeria	16,300	4%
America	21,124	5% of non-Irish pop.
Brazil	4,388	1%

* Only the top countries in each category are noted above.

Table 4.2.2: 2006 Census Immigrant population classified by region

The origin of immigrants has also changed rapidly in Ireland. Between 2000 and 2004, third-country nationals represented half of all non-Irish immigrants. However, since 2005, Ireland's largest share of immigrants has come from the EU-25 countries. Immigrants from the ten new Member States (NMS) which became part of the EU in 2004 were included in the EU figure for 2005 for the

first time,¹⁰ as noted in Figure 4.2. Over 320,000 Personal Public Service Numbers were issued to persons from the EU10 Member States in the first three years of EU enlargement.¹¹

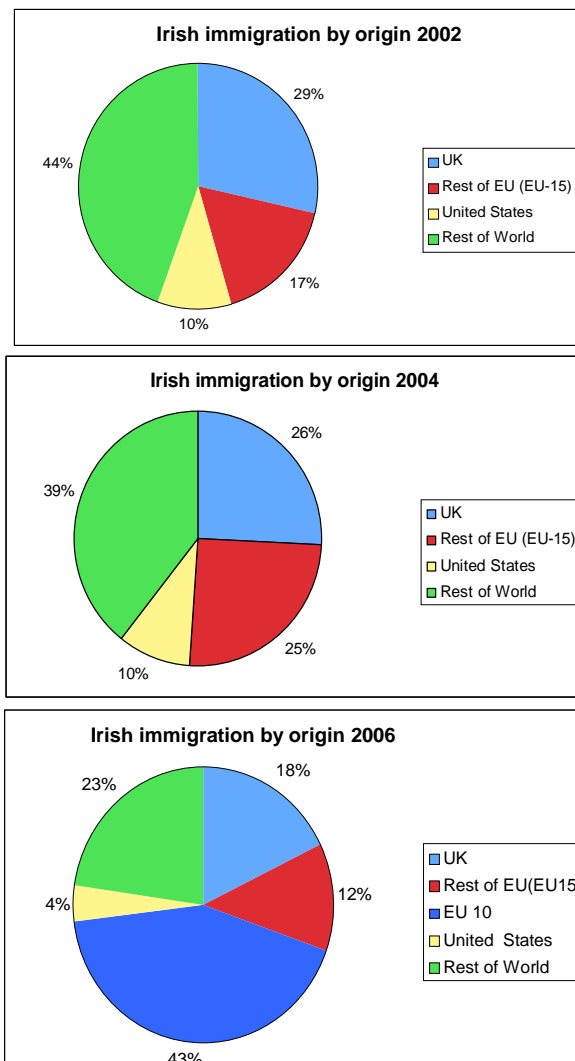


Figure 4.2: Comparison of immigration patterns by origin; 2002, 2004, 2006

¹⁰ In previous years immigrants from the accession states were not separately identified in the data and were included as part of the rest of the world in the CSO's classifications. Migration Policy September 2006 Published by the National Economic and Social Council

¹¹ FÁS Quarterly Labour Market Commentary Second Quarter 2007 Published on the 26th July 2007

When combining data from the 2006 census with data on self-assessed language proficiency among groups of immigrants¹², an estimate of the number of immigrants with poor language skills¹³ can be made. The ESRI report indicated that approximately one third of immigrant respondents to the survey (total sample was 1030 immigrants) assessed their English Language Skills to be poor/fair. This is represented in the figure below.¹⁴ Of the approximately 225,000 adult immigrants from the new EU-countries, Eastern Europe, Africa and Asia registered in the 2006 census, approximately 75,000 needed language tuition, 60 % of which were from the new EU-countries (excluding Bulgaria and Romania). An even higher demand of English language tuition can be assumed today, given that the immigration into Ireland has continued.

English skills among adult (15+) immigrants

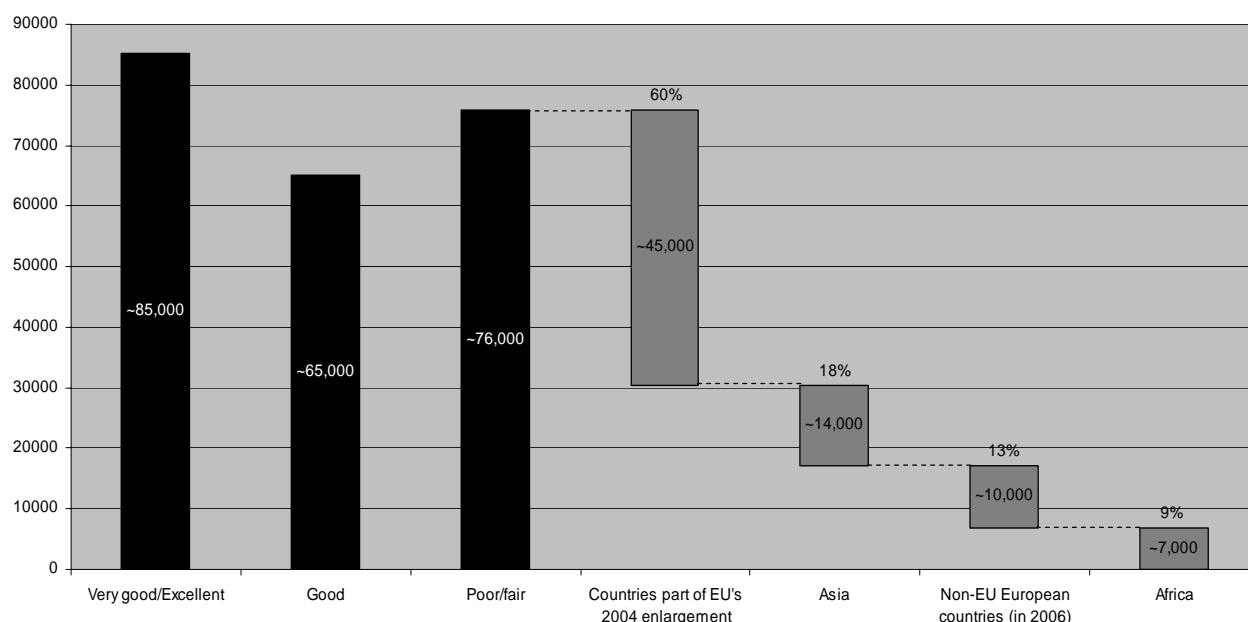


Figure 4.3 – Assessment of English Language Levels

The results of this analysis are supported by the survey findings in Chapter 6.

¹² Survey results from Language Ability of Non-EU Immigrants in Ireland, 2005 (Self Assessed) Evidence from the Survey of Racism and Discrimination in Ireland.

Dr Frances McGinnity, ESRI. July 2007. The estimates are based on an assumption that the language skills among immigrants from the new EU-countries (which were not included in the survey) are similar to language skills among immigrants from non-EU countries in Eastern Europe.

¹³ Defined as immigrants assessing their language skills as 'poor' or 'fair' - the two lowest categories on the five point scale used (poor, fair, good, very good, fluent/native speaker).

¹⁴ Note to figure: The "Non-EU European countries (in 2006)" category predominantly consists of Eastern European countries like Russia, Ukraine and Moldova, and also includes current EU-members Romania and Bulgaria. Two Western European countries, Norway and Switzerland, are also part of this group. Judging from the number of residents from similar countries (like Denmark and Austria), the total number of people from these two countries is likely to be small (less than 1500 in total).

The 2007 analysis by Gamma of recorded populations in District Electoral Divisions, based on the 2006 Census, showed the percentage of the population stating a place of birth as outside Ireland¹⁵. The national average was 14%. Figure 4.4 highlights that immigrants are located right around the country and are not just concentrated in urban areas.

In 2008, immigrants in Ireland are predominantly from the EU, in particular the ten latest accession states. This profile contrasts sharply with many other EU countries. In addition, immigration into Ireland is a relatively new phenomenon compared to immigration in other EU countries.

¹⁵ <http://www.gamma.ie/>

Areas with a high proportion of persons born outside Ireland - 2006

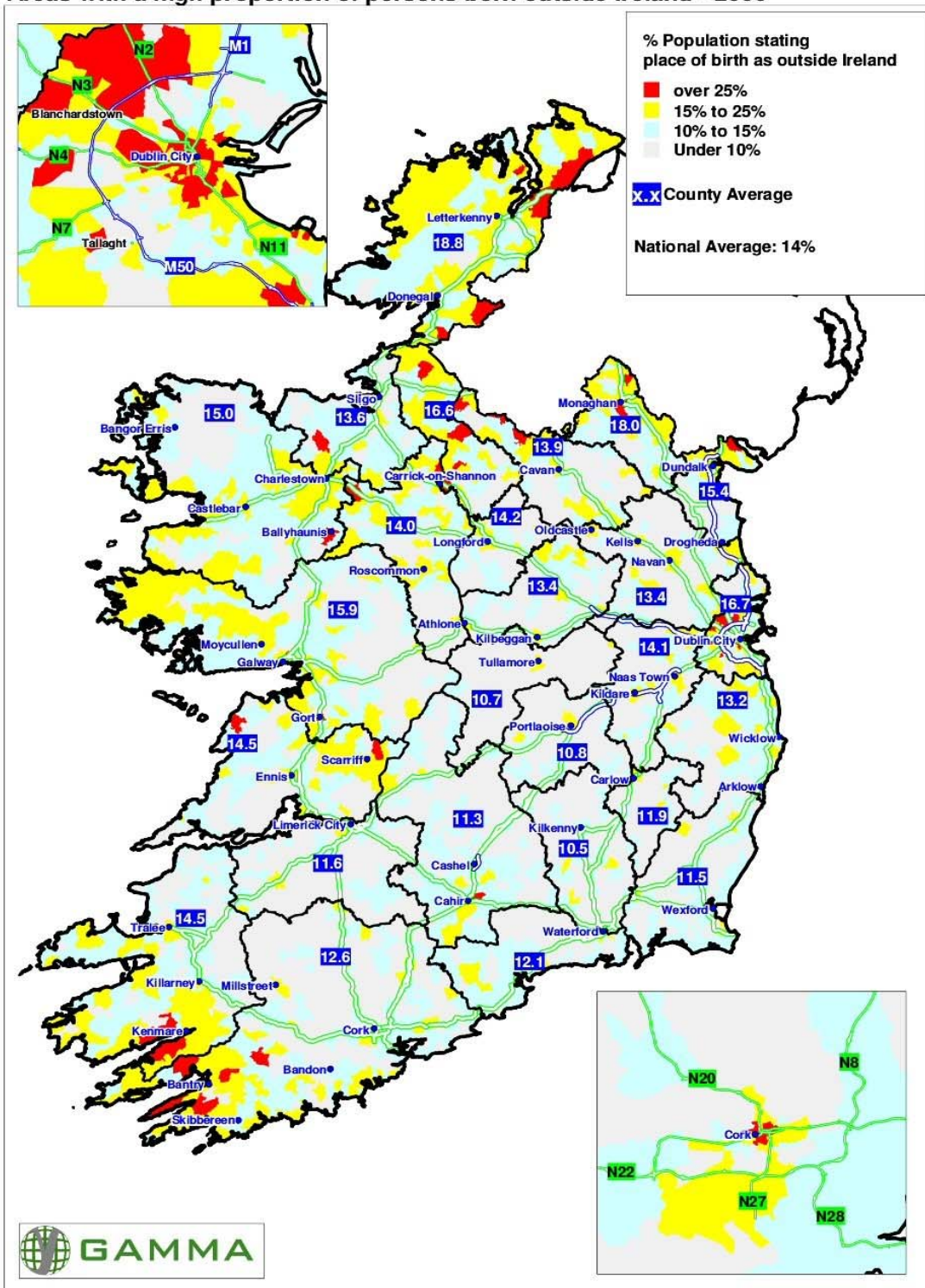


Figure 4.4: National distribution of people born outside Ireland

4.3 The EU, Council of Europe and OECD

The eleven Common Basic Principles on Immigrant Integration Policy in the EU were established by the Council of European Union and the representatives of the Governments of the Member States. (They are listed in Appendix 3).

The principles have been designed to promote a common European approach toward a framework for immigrant integration and to serve as a reference for the implementation and evaluation of current and future integration policies. The key principles which are pertinent to this study are that *“integration is a dynamic two way process of mutual accommodation by all immigrants and residents of Member States”* and *“basic knowledge of the host society’s language, history, and institutions is indispensable to integration; enabling immigrants to acquire this basic knowledge is essential to successful integration.”*¹⁶

The Council of Europe’s Policy for Language Education notes that it *“should promote the learning of several languages (European and others) for all individuals, thereby encouraging plurilingualism and intercultural citizenship, developing language skills and linguistic tolerance necessary for life in an increasingly interactive Europe”*¹⁷. Migrants’ languages should be regarded as an asset to Ireland and this rich variety of linguistic diversity should be embraced.

The OECD, in its recent Economic Survey of Ireland, 2008, notes that the impact of migration has been assessed in several OECD Economic surveys and that *“knowing the language is crucial for successful integration”*

The provision of language programmes should, therefore, be seen as indispensable in the context of the promotion of participation and integration amongst all groups within Irish society. It would also assist immigrants to bridge the common gap between their level of educational attainment/qualifications and their employment status. Well-educated immigrants with low levels of English competence can often be compelled through economic necessity to take low-paid, low-skill jobs representing a sub-optimal use of their previous experience and educational background.

There are a wide variety of methods being employed across the EU and worldwide to maximise the integration of migrants (see Chapter 3). Persistent obstacles to integration are unemployment and poor education / formal skills. This has led to continued recognition of the need to act collectively at EU level, and the EU is working to develop common approaches on integration and to promote exchange of best practices.¹⁸

As the Union has enlarged, it has encompassed a greater variety of ethnic and social groups, and this has required renewed consideration of the most effective ways to integrate immigrants into local communities.

¹⁶ <http://www.epim.info/docs/theproject/EPC%20Issue%20Paper%2027%20Basic%20Principles%20on%20Integration.pdf>

¹⁷ <http://www.ciemer.org/mercator/pdf/simp-jensdottir.pdf>

¹⁸ http://ec.europa.eu/justice_home/fsj/immigration/integration/fsj_immigration_integration_en.htm

4.4 National Policy

4.4.1 Education and Skills

The key goal of the **White Paper on Adult Education: Learning for Life** (2000) was to set out a comprehensive policy for the future development of adult learning in Ireland. (This paper was, however, developed at a time when there were relatively small levels of immigration into Ireland.) The White Paper was a response to poor educational and literacy levels within the adult population, and to comparatively low levels of access to adult learning opportunities and associated support services.¹⁹ The OECD's International Adult Literacy Survey²⁰, conducted in Ireland in 1995, and published in 1997 had showed that one in four of the Irish adult population scored at the lowest level of literacy on a scale of one to five, below the minimum threshold deemed necessary for full participation in social and economic life in developed countries.

Three principles were identified to underpin policy and practice in adult education in Ireland:

1. lifelong learning as a systemic approach (emphasising the interfaces between different levels of education provision);
2. equality of access, participation and outcome for participants in adult education, with proactive strategies to prevent barriers arising from economic and demographic differences; and
3. interculturalism, with a consequent need to frame educational policy and practice in the context of serving a diverse population as opposed to a uniform one.

The White Paper stresses the need to encourage the participation of asylum seekers, refugees and immigrants in educational provision. Refugees have access to education in the same manner as Irish citizens. Adult asylum seekers are eligible for language and literacy support through the VECs. The Paper also sets the policy context for the development of English Language Tuition provision.

4.4.2 Employment

In addition to the poor levels of adult literacy identified in the White Paper, Ireland is also experiencing a decline in the numbers leaving second level education (a trend predicted to increase over the coming decade), which in a tight labour market will exacerbate the skill shortages in the current workforce.²¹ In addition to the economic effect that this trend might imply, there are a number of social concerns driving the Lifelong Learning agenda. The Report of the **Taskforce on Lifelong Learning** (2002) (established by the DETE in collaboration with the DES) set out a strategic framework by mapping existing Lifelong Learning provision, identifying gaps in that provision and proposing solutions to fill those gaps.

¹⁹ White Paper **on Adult Education: Learning for Life** (2000)

²⁰ "Literacy, Economy and Society: Results of the First International Adult Literacy Survey", OECD 1997

²¹ <http://www.entemp.ie/publications/labour/2002/lifelonglearning.pdf>

In 2005, the Expert Group on Future Skills Needs set about identifying the skills required for Ireland to become a competitive, innovation-driven, knowledge-based, participative and inclusive economy by 2020²². Specifically, the Expert Group concludes that, if Ireland is to compete effectively in the global market place, it requires enhancing the skills of the resident population, increasing participation in the workforce, and continuing to attract highly skilled migrants.

Specifically, the Expert Group proposes a vision for Ireland that, by 2020:

- 48 percent of the labour force should have qualifications at National Framework of Qualifications (NFQ) levels 6 to 10;
- 45 percent should have qualifications at NFQ levels 4 and 5; and
- The remaining 7 percent will have qualifications at NFQ levels 1 to 3.

In order to achieve these objectives, action is required at a number of levels:

- An additional 500,000 individuals within the workforce will need to progress by at least one NFQ level;
- Specifically, upskill 70,000 from NFQ levels 1 & 2 to level 3; 260,000 up to levels 4 & 5; and 170,000 to levels 6 to 10.

This requirement to enhance the skill level of the working population presents a substantial challenge, as Ireland's participation rate in continuous learning (non-formal learning) is relatively poor. Only 14 percent of 25-64 year olds in Ireland engaged in non-formal learning in 2002, compared with 16.5 percent in the EU25 and 34.5 percent in the UK.²³

4.5 National Action Plan Against Racism

The **National Action Plan Against Racism** (NPAR) for Ireland arises from the Irish Government's commitments given at the UN World Conference Against Racism in September 2001.²⁴ The Plan prioritises building an intercultural dimension into all Government programmes/initiatives, with a key challenge being to ensure that immigrant workers and their families are integrated in a way that is consistent with the requirements of policy on immigration, employment and equality. The NPAR is based on five objectives: protection, inclusion, provision, recognition and participation. Consistent with its message of inclusivity in education, it specifically mentions a need to enhance the provision of training in English as a Second Language (ESL).²⁵

The main thrust of the Plan is to encourage inclusion by design, rather than as an afterthought of policy development. In practice, this will mean implementing an anti-racism, intercultural programme at every level of the education system in line with the recommendations of the National Action Plan.

²² <http://www.skillsireland.ie/press/reports/index.html>

²³ <http://www.skillsstrategy.ie/>

²⁴ <http://www.nccri.ie/nccri-background.html>

²⁵ "Planning for Diversity", National Action Plan Against Racism, 2005

4.6 National Action Planning

4.6.1 Introduction

The key constituent elements of Ireland's National Planning are listed below;

- Towards 2016, Ten-Year Framework Social Partnership Agreement 2006-2015;
- National Development Plan 2007-2013;
- National Action Plan for Social Inclusion 2007 – 2016;
- Programme for Government 2007-2012.

Integration and social inclusion are endorsed within the above elements and are described in some detail in the paragraphs below.

4.6.2 Towards 2016

Towards 2016 is a ten-year Social Partnership Agreement (covering the years 2006-2015). It has been negotiated by parties including the Government, trade unions, employers, farming organisations and the community and voluntary sector. Towards 2016 is the overall framework into which a number of other national strategies contribute.

Its focus is to ensure Ireland continues to be a dynamic, internationalised, and participatory society and economy, with a strong commitment to social justice, where economic development is environmentally sustainable, and internationally competitive.²⁶ Of the goals, the most relevant to education and integration of legally resident immigrants are nurturing the complementary relationship between social policy and economic prosperity; deepening capabilities; achieving higher participation rates; and, more successfully handling diversity, including immigration.

The plan is based on the lifecycle of the citizen, and places the individual at the centre of policy development and delivery, by assessing the risks facing him/her, and the supports available to him/her to address those risks, at key stages in his/her life. Such an approach helps to highlight factors such as lifelong learning and links improved competition within the economy with increased investment in human resources and innovation.

Towards 2016 is a successor of the Programme for Sustaining Progress, which committed to a workplace basic education and literacy/numeracy/information and communication technologies programme.

4.6.3 National Development Plan 2007-2013

The €184 billion **National Development Plan 2007-2013** builds on the significant social and economic achievements of the **NDP/CSF (2000-2006)**. Launched in January 2007, and entitled ***Transforming Ireland - A Better Quality of Life for All***, this new seven-year plan is aimed at building a

²⁶ Towards 2016, Ten-Year Framework Social Partnership Agreement 2006-2015

prosperous Ireland for all its people, characterised by sustainable economic growth, greater social inclusion and balanced regional development.

4.6.4 **National Action Plan for Social Inclusion 2007 - 2016**

The high levels of economic growth experienced by Ireland in recent years has contributed greatly to combating poverty and social exclusion, especially through a major increase in employment participation, greatly reduced unemployment and much greater social investment in income support and other services. The significant increases in resources invested in the social security system has resulted in major reductions in consistent poverty and in the numbers below the 40% and 50% median income thresholds.²⁷

The European Council meetings in Lisbon and Feira in 2000 set the strategic goal of making the European Union by 2010, *“the most competitive and dynamic knowledge-based economy in the world, capable of sustainable economic growth with more and better jobs and greater social cohesion.”* Arising from this, the **National Action Plan for Social Inclusion** has been drawn up to set out the strategies, specific measures and institutional arrangements at national level in making progress to achieve these goals.²⁸

The Plan ensures that combating poverty and social exclusion is a key part of national efforts to promote economic and social development. The Plan is coordinated with the **National Reform Programme** and they should be viewed jointly to get a full picture on the measures being taken to combat social exclusion²⁹. It provides a basis for continuing the dialogue with the social partners, NGOs and other interested parties at national level on further developing the policies and programmes to meet that objective, it also makes specific mention of the importance of taking account of diversity among those living in poverty.³⁰

4.6.5 **Programme for Government 2007-2012**

The Programme for Government 2007-2012³¹ sets out a shared vision for Ireland's development over this five year time-span. As part of the Programme, a fair and strategic immigration policy is viewed as an imperative to the sustaining of a strong economy. Legal immigrants are welcomed to Ireland to support Ireland's development and to help them become full and active participants in Irish life.

4.7 **National Legislative Context**

The **Department of Justice, Equality and Law Reform** is responsible for immigration law and immigration controls in Ireland (including admission, residence and citizenship issues) and for the Irish contribution to developing EU and international policy on immigration and related issues.³²

²⁷ http://www.taoiseach.gov.ie/attached_files/Pdf%20files/ActionPlanagainstPoverty.pdf p1

²⁸ http://www.taoiseach.gov.ie/attached_files/Pdf%20files/ActionPlanagainstPoverty.pdf p1

²⁹ http://www.eapn.ie/pdfs/48_Irish%20National%20Reform%20Programme%202005-2008.pdf

³⁰ http://ec.europa.eu/employment_social/employment_strategy/nap_2004/nap2004ie_en.pdf

³¹ http://www.taoiseach.gov.ie/attached_files/Pdf%20files/Eng%20Prog%20for%20Gov.pdf

³² <http://www.justice.ie/>

The key legislative Act currently controlling the entry of immigrants is the **Immigration Act (2003)**, which makes provisions in relation to the entry of non-nationals. This is supplemented by the controls under the **Employment Permits Act (2006)**, which provides for the granting of employment permits to certain foreign nationals to allow them to be employed in Ireland. It also allows for the number of permits to be regulated and establishes that criteria must be met before permits are issued.³³

The **Immigration, Residence and Protection Bill 2008**, when enacted, will contain many of the provisions of the Immigration Act and will set out a legislative framework for the management of inward migration to Ireland. It will also lay down a number of principles governing the presence of foreign nationals in the State. It will set out statutory processes for applying for a visa, for entry to the State, for residence in the State and for being required, when necessary, to leave. Of special note is the proposed provision in statute for foreign nationals to obtain long-term residence permits, giving to the holders rights in the State similar in most respects to those of Irish citizens. It sets out a system for residence permits which will form the basis for lawful residence in Ireland into the future.³⁴

4.8 The Reception and Integration Agency (RIA)

Established in 2001, the RIA had two principal functions: (i) accommodating of asylum seekers and the coordination of ancillary services and (ii) development and implementation of integration policy. The former function is still carried out by the Agency, the integration function was expanded and responsibility assigned to the Office of the Minister for Integration following the appointment of a Minister of State in June 2007 with responsibility for the development of integration policy.

4.9 The Office of the Minister for Integration (OMI)

The OMI has responsibility for, *inter alia*, the development and implementation of a national integration policy. The development of this policy will be facilitated through the establishment of a Task Force on Integration, a Ministerial Council to consult with migrants and a Commission.

The OMI also encourages and assists the host population to understand and value the economic and social contribution of newcomers.³⁵ The Minister for Integration is based in the Department of Community, Rural and Gaeltacht Affairs but has primary links to the Departments of Justice, Equality and Law Reform and Education and Science. The OMI has a cross-Departmental mandate to develop, drive and coordinate integration policy across other Government Departments, agencies and services.

This integration function is underpinned by the general policy objectives of ensuring that the rights of all newcomers are upheld regardless of ethnic and cultural background, and that opportunities are provided to enable newcomers to

³³ <http://www.entemp.ie/publications/labour/2006/emppermitsact2006.pdf>

³⁴ <http://www.oireachtas.ie/documents/bills28/bills/2007/3707/b3707s.pdf> Explanatory Memorandum to the Immigration, Residence And Protection Bill 2007

³⁵ <http://www.ria.gov.ie/>

effectively participate in the economic, social and cultural aspects of Irish society.

4.10 Government Organisations and Policy Delivery

4.10.1 Department of Education and Science

The Department of Education and Science (DES) is the central agent in the delivery of education policy designed to enable individuals to achieve their full potential and to participate fully as members of society and to contribute to Ireland's social, cultural and economic development. Amongst the Department's priorities are the promotion of equity and inclusion, quality outcomes and lifelong learning; planning for education that is relevant to personal, social, cultural and economic needs.³⁶

DES has identified the English language as central to developing the skills and confidence necessary to engage with Irish society.³⁷ It promotes the development of the English language in the further education sector by funding the following programmes:

Adult literacy and community education; Vocational education and training programmes for:

- Early school leavers
- Unemployed people
- Travellers and
- Participants on PLC courses

Its recent developments for the sector (as outlined in its 2005-07 Statement of Strategy) include: expanding access to education, supporting quality improvement, a National Adult Literacy Strategy, a part-time Back to Education Initiative aimed at flexible learning for those with less than upper secondary education and including an Adult ICT skills programme, the development of an adult guidance service, and the expansion of community education models.³⁸

4.11 Workforce Training

4.11.1 Department of Enterprise, Trade and Employment

The **Department of Enterprise, Trade and Employment**³⁹ is the primary policy agency responsible for labour market policy. Its remit includes, amongst others, labour force development, competitiveness and international affairs, and employment rights and industrial relations.

It set out the following Objectives and Strategic Actions in its Statement of Strategy 2005-2007.

- Economic migration issues – the Department will actively pursue this agenda, in particular the early enactment of the Employment Permits Act (2006) and general monitoring of the post-enlargement situation.

³⁶ Department for Education and Science – Statement of Strategy 2005-07.

³⁷ DES, 2002

³⁸ Department for Education and Science – Statement of Strategy 2005-07.

³⁹ <http://www.entemp.ie/aboutus.htm>

- Lifelong Learning – the Department will maintain a strong focus on the Lifelong Learning (training in employment) agenda, in keeping with Ireland's policy of moving up the skills ladder in an increasingly knowledge-driven economy and in line with the Lisbon Agenda.⁴⁰

The Department also has policy responsibility for a number of state-sponsored bodies, including FÁS.

4.11.2 National Training Fund

The National Training Fund is resourced by a levy on employers of 0.7% of reckonable earnings in respect of employees in Class A and Class H employments. This represents approximately 75% of all insured employees. The National Training Fund has supported schemes operated by FÁS, Enterprise Ireland, IDA Ireland, Shannon Free Airport Development Company (SFADCo), Skillnets Ltd., the Institute of Engineers of Ireland, and the Higher Education Authority.

4.11.3 FÁS⁴¹

As the National Training and Employment Authority, FÁS anticipates the needs of, and responds to, a constantly changing labour market, which employs over 2 million people. Through a regional network (8 regions) of 66 offices and 20 training centres, FÁS operates training and employment programmes; provides a recruitment service to jobseekers and employers, an advisory service for industry, and supports community-based enterprises.

The FÁS Corporate Strategy 2007 – 2009 outlines eight High Priority Goals and actions to be taken by the organisation during this period. These goals cover areas such as services for job seekers and the unemployed, workforce development, labour market policy, social inclusion, equality and diversity and customer service.

In response to the increased demand for FÁS services from Ireland's growing immigrant population, FÁS introduced a telephone interpretation service (Language Line) in its Employment Services offices. This service is available in over 150 languages. This is supplemented by the 'Know Before You Go' initiative which provides useful information to citizens of the countries that acceded to the EU in May 2004 and January 2007, in preparation for travel to, and arrival in, Ireland.

'Know Before You Go' information leaflets and DVDs provide some information on how to access English Language classes. In addition, services are provided through the EURES system (EUROpean Employment Services), which was established by the European Commission to facilitate the free movement of workers. This service provides job listings from all over Europe, including Ireland; a central database of working and living conditions for the relevant country and specially trained EURES Advisers, who give comprehensive mobility advice and guidance.

⁴⁰ <http://www.entemp.ie/publications/corporate/2005/strategystatement.pdf>

⁴¹ <http://www.fas.ie/en/About+Us/Home/default.htm>

FÁS does not provide “extensive English language tuition”, but it does provide a certain amount of technical English within vocational training courses where participants need it. In 2006, the English Language Tuition programme budget for FAS was almost €730,000.⁴²

4.11.4 Skillnets

Skillnets is an enterprise-led support body dedicated to the promotion and facilitation of learning and skills development as a key element in sustaining Ireland's national competitiveness. Skillnets is funded by the Department of Enterprise Trade and Employment from the resources of the National Training Fund and has been allocated increased funding to continue its support for training networks in 2007- 2009. The Government has now granted a new five-year mandate to Skillnets for 2005-2010. Up to €55 million will be made available from the National Training Fund.⁴³

Skillnets supports networks of enterprises to engage in training under the Learning Networks Programme. These networks are led and managed by the enterprises themselves and have created and delivered training programmes across a broad range of industry and service sectors nationwide. Its stakeholders include the Irish Business and Employers Confederation, Chambers Ireland, the Construction Industry Federation, the Small Firms Association and the Irish Congress of Trade Unions, as well as the thousands of enterprises and trainees it works with on a day-to-day basis.⁴⁴

4.12 English Language Provision

4.12.1 Overview

English Language Tuition is delivered by three main categories of providers:

- State-funded provision of ELT (English for Speakers of Other Languages) mainly through Vocational Educational Committees (VEC);
- Private Language Schools;
- English Language Tuition provided by Non-Governmental Organisations (NGOs) and Charitable Institutions.

4.12.2 State-funded/Public Providers

English Language Tuition (ELT) is in the main delivered by the nationwide network of VECs, with funding from their annual Adult Literacy and Community Education Scheme grant (ALCES) from the Department of Education and Science. ELT programmes do not have a separate funding line. In 2007, approximately 12,000 places (30% of overall ALCES places) were allocated to English Language students at a cost of approximately €10m.

A typical course would last for fourteen weeks and be of two hours duration per week. Learners may take a number of these courses. VECs run ELT based

⁴² FÁS Annual Report and Financial Statements 2006

⁴³ <http://www.skillnets.com/skillnets/about/index.html>

⁴⁴ <http://www.skillnets.com/skillnets/about/index.html>

generally on between 8 and 12 attendees. There are five levels of ELT available in VECs; beginner, elementary, lower intermediary, upper intermediary and advanced. Elementary and lower intermediary are the most popular classes.

From consultations with VEC representatives, 40 hours of English Language Tuition would cost the student between €250-€300. This suggests an indicative hourly rate of up to €7.50 per hour per student for ELT. These classes are also provided, where needed, to participants in the Back to Education Initiative (BTEI), in the Vocational Training and Opportunities Scheme (VTOS) and the Post Leaving Certificate (PLC) programme.

4.12.3 Adult Education Guidance Initiative (AEGI)

The White Paper - Learning for Life (2000)⁴⁵, highlighted the need to establish a supporting service in guidance and counselling for adults participating in adult education programmes funded by the Department of Education and Science.

The Adult Education Guidance Initiative provides a nationwide guidance service to adult learners in VTOS, BTEI, literacy and community education programmes. Most AEGI programmes are attached to the VECs.

The AEGI is funded by the DES under the National Development Plan 2007-2013. The National Centre for Guidance in Education (NCGE), an agency of the DES, has been given the lead role in the Initiative.⁴⁶

4.12.4 Private Language Schools

There are currently over 120 Advisory Council for English Language Schools-approved (ACELS) English as a Foreign Language (EFL) providers or administrators in operation in Ireland. The client group for this English Language Tuition is generally visitors to Ireland who learn English here for a finite period of time, they may work part-time but generally do not intend to settle in the country.

Some 62 of these private language schools are members of MEI RELSA, which is an association of English Language Schools, operating language courses in over 120 locations around Ireland. There are also a number of unrecognised EFL schools or providers in Ireland. Many operate on a transitory or seasonal basis to cater for the needs of students who come for a short period in the summer to learn English. Enrolment tends to be at its highest during the peak season in July and August. These schools are not in operation during the rest of the year.

Courses designed for, and delivered to, migrant workers have increased considerably across the country in ACELS-approved schools in recent years. Of the 30 schools inspected in 2007, there are over 10 running between 8-12 classes per school (15 students max per class as per regulations) attended almost exclusively by migrant workers generally taking place in the evenings and/ or Saturdays. In at least 5 of the schools inspected in 2007, this is their core business.

⁴⁵ <http://www.ncge.ie/documents/adult/New%20Guidelines%202007.doc> , Section 8.5.

⁴⁶ <http://www.ncge.ie/documents/adult/New%20Guidelines%202007.doc>

English Language courses generally are between 10-12 weeks duration, cost between €8 and €10 per hour and the migrant workers seem to want courses culminating in a recognised English language exam (Cambridge suite of exams and TIE exams are the most popular). Many continue on and take further courses.

A 2006 report published by Indecon (International Economic Consultants) relating to ELT in Ireland indicated an average monthly cost of about €800 per month for full-time ELT provision (*in 2008 this figure would be higher*).

Average Cost of an English Language Course in Ireland in 2001 and in 2006 – € ⁴⁷		
	2001 - €	2006 - €
One month English language tuition	636	804
Accommodation		
Residential (per week)	-	156
Family (per week)	132	162

Table 4.12: English Language Course – Cost profile

Taking the above figures set out in Table 4.12, an indicative hourly rate per student for tuition charged by the private language schools is from €10 up to €15.

Although quality assurance is not mandatory for English language providers, over 100 schools have been inspected by ACELS in the recent past. The list of recognised English language schools is published on an annual basis.

4.12.5 NGOs, Charitable and Religious Groups

There is no mandatory licensing for teachers of English. Many voluntary groups provide language learning opportunities. Although teachers are not always trained, the role they perform is important as engagement in this form of English language tuition can improve proficiency and can lead learners to participate in other more formal education settings. It is often through community groups/churches etc. that migrants are introduced to language learning. Churches, community groups and voluntary bodies have played an important traditional role in supporting refugees and migrants to learn English.

The use of qualified teachers to deliver structured English language tuition is desirable, but whatever solution is applied it should not prevent the voluntary sector from providing English language tuition. Such classes can provide migrants with an extra opportunity to learn English.

4.12.6 E-Learning and Library-based Language Tuition

There is value in exploring delivery modes such as e-learning through internet websites or English Language Tuition broadcasts. In addition, more targeted use of library computer facilities to enhance classroom tuition can open up flexible learning opportunities to motivated students. These students could utilise the Internet as a tool for learning, and harness its educational potential through bringing people together to communicate in a vocational manner.

⁴⁷ Language Travel Magazine Global Comparison, 2001/2002 and March 2006 and Education UK

E-learning and the use of libraries computer facilities are not a straight alternative to classroom tuition but all learning modes can reinforce each another. ELT-related broadcasts on television could be used to raise awareness among the target group that in-class tuition exists and is available to them. Likewise, teachers can refer to libraries, TV shows and other e-learning arrangements to enhance learning speed. In this regard, e-learning and classroom tuition are complementary.

Projects, such as the 'Survival English' project initiated by Community Radio Castlebar, Co Mayo, in collaboration with Co Mayo VEC, to support foreign nationals living in Mayo to acquire basic skills in the English language, could be developed. This project, which was initiated in 2006, was supported financially by the Broadcasting Commission of Ireland.

Another recent development illustrating the burgeoning capacity for creative educational broadcasting approaches is one where University College Cork has recently been granted (with Cork and Waterford ITs) a broadcast license for a 'National Life Long Learning Channel', Ireland's first educational television channel. The backers of the channel regard this as an opportunity to develop a dedicated television service focusing on migrant and minority communities in Ireland in a manner which could be an important tool in assisting the process of integration. A broadcast ELT service is envisaged to help meet the educational remit of the station, serve as a way of introducing Ireland and Irish society to new migrants and represent a very effective ELT tool using Irish-themed material. It is hoped that it will be complemented by appropriate literature and locally organised classes and work to certified FETAC standards up to, for example, level 6.

4.13 Key Organisations

4.13.1 Education Ireland

The Interdepartmental Group established to consider the question of the Internationalisation of the Irish Education Service recommended in its report, published at the end of 2004, that a new body (Education Ireland) be established. The Group was mandated to consider the possibility of establishing a single agency for the promotion of Ireland as a centre of educational excellence.

The Group recommended the new body should amongst its functions;

- Assume responsibility for the certification of English Language schools, including a mandatory framework and Quality mark for courses of more than three months duration, and voluntary recognition / approval arrangements for courses of less than three months duration.
- Control standards of accreditation and teachers training and ensure the use and development of appropriate testing and certification instruments.

4.13.2 Advisory Council for English Language Schools

The Advisory Council for English Language Schools (ACELS) was established in 1969 under the auspices of the Department of Education and Science to control standards in EFL schools and organisations through an inspection/recognition scheme. ACELS' remit also includes recognition of teacher training (TEFL) courses and the development of materials and examinations for overseas students.

ACELS administers the School Recognition scheme delivered by the DES to assure that students studying English as a foreign language (EFL) in Ireland receive high teaching and educational standards as well as a commitment to their welfare, safety and social benefit. A list of recognised English Language Tuition organisations is published on an annual basis and quality standards are measured in five areas:

- General management and administration;
- Academic management (course design etc);
- Teaching Performance;
- Social programme/student welfare;
- Premises.

In order to be able to teach in a recognised EFL school in Ireland, teachers must possess recognised Teaching English as a Foreign Language (TEFL) qualifications. This equates with a third-level degree/diploma *plus* an approved TEFL qualification (Certificate of English Language Teaching at a minimum).⁴⁸ ACELS' remit also includes recognition of teacher training (TEFL) courses and the development of materials and examinations for overseas students.

4.13.3 Irish Vocational Education Association

The Irish Vocational Education Association (IVEA) represents the interests of Ireland's 33 VECs. As a representative body, IVEA promotes the interests of vocational education and training within the wider education sector.

IVEA's objectives include informing, assisting and directing its membership to respond to and implement the provisions set down in legislation of relevance to the VEC sector. It also influences the development of policy through negotiation, consultation and submission to the drafting and publication of legislation that will impact on the development of the vocational education sector.

IVEA delivers education and training programmes targeted at the general membership within the vocational education sector and supports the VECs to quality-assure their performance and liaises with FETAC on behalf of the vocational education sector.

⁴⁸ The Certificate of English Language Teaching qualification takes about 4 weeks. The Diploma in English Language Teaching qualification takes about 8 weeks and we understand from our consultations with stakeholders that less than 5% of EFL teachers in recognised schools in Ireland have the Diploma qualification. We understand that 'quality', as measured by the level of TEFL qualifications held by providers, is high in Australia.

4.13.4 Integrate Ireland Language and Training

The Department of Education and Science established Integrate Ireland Language Training (IILT) to advise it on matters relating to the English language provision for newcomers across the education system, and to provide courses for adult refugees.

IILT was originally set up as a Research and Development unit with delivery of classes as a secondary activity - primarily for research use. Included amongst the key areas of IILT activity over the past ten years are:

- the development of a framework curriculum, in close collaboration with adult learners, to meet the needs of refugees/migrants in Ireland;
- the focus on both language and integration throughout, including cross-cultural awareness;
- a learner-centred approach throughout in which learners drive the programme of learning to address both immediate and general needs; and
- merging of the Common European Framework of Reference for Languages with FETAC accreditation.

IILT continues to develop a repository of accessible classroom materials which are available via its website and has also provided training to VECs which has been evaluated positively. IILT works closely with the Council of Europe in relation to language pedagogy and, in particular, migrant language learning throughout Europe. IILT has hosted regular study visits from colleagues, curriculum designers and ministry officials from a number of European countries

In 2006 IILT's English language courses for adults with refugee status underwent expansion, with classes being offered at 13 centres throughout Ireland (there were 7 centres in 2005). The two principal foci of IILT's courses are the development of language knowledge and skills to support membership of and integration into Irish society, and the identification by participants of immediate language learning needs as well as possible future areas of employment, with appropriate preparation.⁴⁹

4.13.5 National Adult Literacy Agency (NALA)

National Adult Literacy Agency (NALA) is an independent membership organisation with a lobbying role. It receives a grant from the DES to staff national and regional offices, and other government departments fund specific research and work.

NALA's ELT support consists of:

- the development of materials for learners and tutors;
- the provision of training for tutors and coordinators (though less so now that VECs are undertaking training); and
- delivering ELT conferences.

⁴⁹ Integrate Ireland Annual Activities Report 2006
<http://www.iilt.ie/fileupload/File/Reports%20and%20Publications/Report%20year%202006%20250707.pdf>

The Agency is involved in the development of accredited courses for teachers in ELT and adult literacy in conjunction with Waterford Institute of Technology.

NALA recently completed a consultation process to examine provision of ELT in Adult Literacy Schemes. A major part of this work is developing 'Policy Guidelines and Supports' in relation to ELT for the literacy service. The process also involved research into policy guidelines and supports in Ireland and other countries. In particular how can existing experience and skills be applied to the Literacy Service. The ultimate aim of this work is make support for ELT clients more beneficial and satisfactory.

4.13.6 POBAL

Pobal is an intermediary company established to promote social inclusion, reconciliation and equality and to counter disadvantage through local social and economic development⁵⁰. Pobal is a not-for-profit company with charitable status that manages programmes on behalf of the Irish Government and the EU, such as the Local Development Social Inclusion Programme. Pobal supports partnership approaches to decision making in order to engage communities and it promotes co-ordination between communities, state agencies and other stakeholders.

In 2006, the Minister for Justice, Equality and Law Reform established the Immigrant Integration Fund of €5m. €3m of the fund was dispersed through the Pobal framework to Partnership companies at local level (€2m) and to national Non Government Organisations (€1m) to promote partnership approaches between state agencies, local community organisation and other stakeholders at national and local levels so as to enable them to become actively involved in integration related activities. This was seed funding and not intended to remove or replace mainstream responsibility for service provision.

4.14 Qualifications and Standards

4.14.1 National Qualifications Authority of Ireland (NQAI)

The National Qualifications Authority of Ireland, established in 2001 has developed the National Framework of Qualifications (NFQ). This framework, launched in 2003, provides a single coherent and easily understood qualifications system for all levels of education and training in the state. Figure 4.14 is a diagrammatic representation of the 10 levels in the framework. The NFQ will be aligned to the European Qualifications Framework.

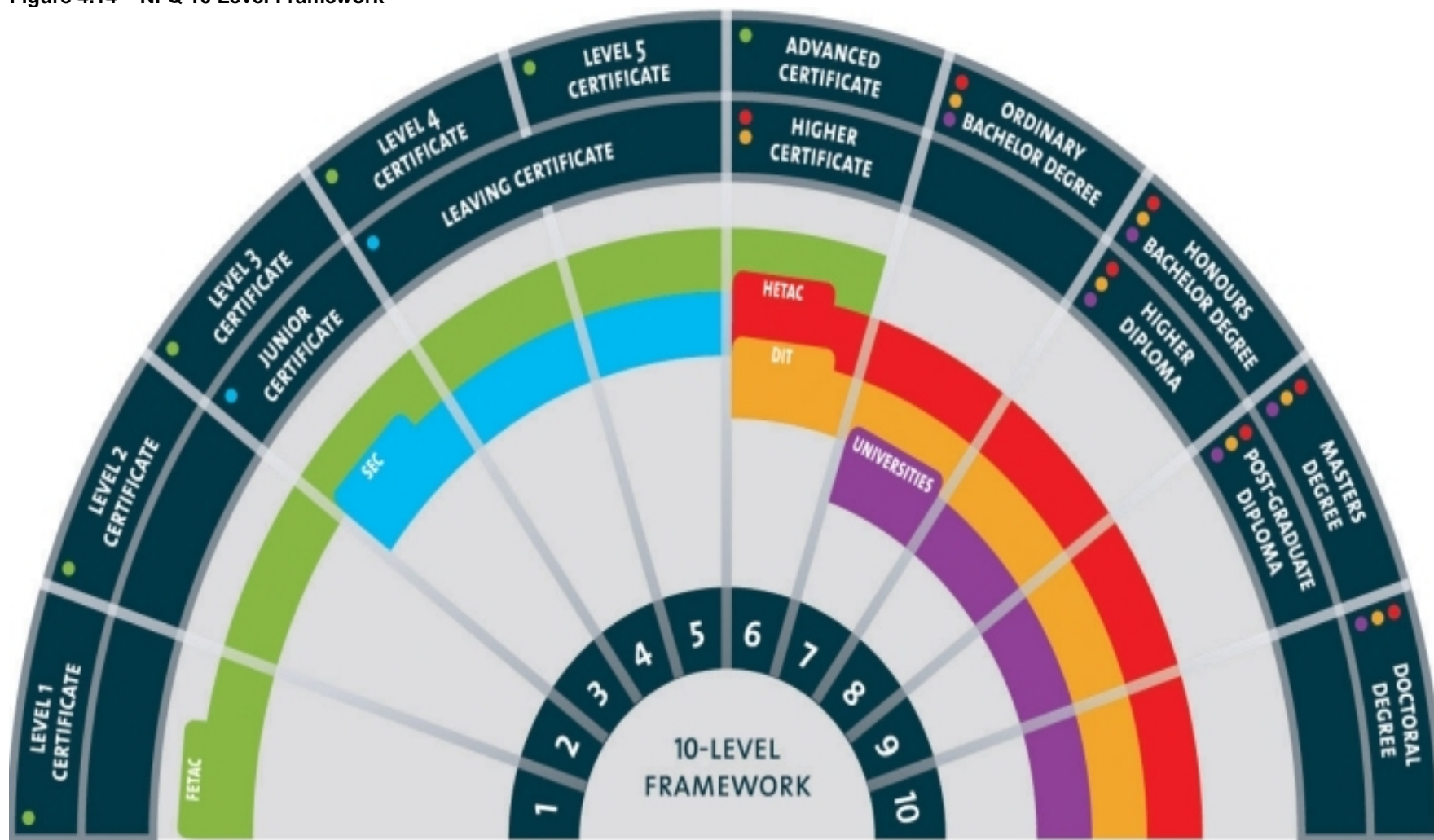
The NQAI has established Qualifications Recognition - Ireland as the Irish centre for the recognition of international qualifications. Immigrants can use this service to have their qualifications recognised. The Authority represents Ireland in a European Network of centres known as ENIC/NARIC (European National Information Centre/National Academic Recognition Information Centre) and

⁵⁰ www.pobal.ie

NRP (National Reference Point) which promote the recognition of international qualifications throughout Europe and further afield.

The International Qualifications Database contains information regarding foreign qualifications and education and training systems which is useful to holders of foreign qualifications, employers, institutions and other interested parties. It lists the foreign qualifications that have been processed to date by Qualifications Recognition - Ireland and states the advice that has been issued regarding the comparability of the qualifications in Ireland.

Figure 4.14 – NFQ 10 Level Framework



4.14.2 Further Education and Training Awards Council (FETAC)

FETAC was established under the Qualifications (Education and Training) Act 1999. FETAC is responsible for making and promoting awards at levels 1-6 of the National Framework of Qualifications and for maintaining and improving the quality of education and training. FETAC qualifications are recognised and understood nationally and internationally.

FETAC awards are available through programmes offered by FAS, Vocational Educational Committees, Failte Ireland, Teagasc, Bord Iascaigh Mhara and others.

The Council maintains and improves the quality of further education and training in Ireland through the validation of programmes leading to awards, and through agreeing providers' quality assurance systems, and monitoring the implementation of agreed quality assurance systems. Providers are responsible within this system for ensuring that programmes are developed, delivered and reviewed according to quality assurance systems that have been agreed with FETAC. Providers are responsible for devising programmes which meet the awards standards and the needs of specific learner groups.

FETAC has a number of minor awards in English as a Second Language covering levels 3 – 5. Standards are also available at level 1-6 in communications which cover listening and speaking (oral communications, non-verbal communications, written communications and reading). Awards are also available for Languages, aligned with the European common languages framework. Awards and standards will be reviewed by 2010 to further align them to the National Framework of Qualifications through Standards Development Groups.

4.15 Interpreting and Translation Services

The research project **“The Development of Quality, Cost-Effective Interpreting and Translation Services for Government Service Providers in Ireland”** is currently being overseen by the National Consultative Committee on Racism and Interculturalism (NCCRI)⁵¹ and funded by the OMI. A core aspect of the methodology was asking immigrant participants if they perceived language as a barrier for accessing public services; and when or if they used professional interpreters/translators to do so. Participants indicated strongly that language barriers presented problems when accessing services, especially when they had to deal with complex situations or deal with technical or specialised terminology.

In the draft report on Interpreting and Translation, language was reported as a barrier for many members of different minority ethnic groups when trying to access public services. The report noted that the “provision of interpreting and translation services to assist minority ethnic groups to integrate and to participate in Irish society is only one part of the overall approach to integration in Ireland. The provision of English language education and training was also seen as another important part of Ireland’s overall policy response”.

The Report emphasises the need to ensure that immigrants are offered opportunities for developing and improving their English language skills.

⁵¹ NCCRI, 2008

5. WRITTEN SUBMISSIONS AND CONSULTATIONS

5.1 Introduction

This section documents the findings from;

1. Stakeholder Consultations – direct interviews and group meetings;
2. Written Submissions.

In the next Section of the report, findings are documented from the web-based survey of institutions that are either involved in the provision of English Language Tuition or have an interest in the provision of English Language Tuition.

5.2 Findings from consultations with stakeholders

5.2.1 Overview

Meetings with representatives from over 30 organisations were conducted, the organisations are listed in Section 2.4.1 above.

The primary areas for discussion at the stakeholder consultation meetings were their views on the current English Language policy and system, services that stakeholder provide, views on what should be included in the English Language Policy and perspectives on the funding of English Language provision.

Key findings from our discussions with strategic consultees are listed below under the following headings:

- Assessment of Immigrants' English Language proficiency;
- Links between Citizenship and English Language proficiency;
- Barriers to participation;
- Qualified teaching resource;
- The role of employers;
- Funding for English Language tuition;

The commentary below is based on the findings of the interviews with key stakeholders consultations. Comments are generally reported where they represent a synthesis of the majority of views expressed and/or provide a consensus.

It is important to note that the commentary set out in the following sub-sections reflects a distillation of views expressed, rather than a definitive statement of a uniform view of what a future policy should look like.

5.2.2 Assessment of Immigrants' English Language Proficiency

Consultees indicated that ELT currently lack common standards i.e., no standardised assessment of the immigrant's English language proficiency prior to entry, no standardised exam after completion of the course and no common teaching material. In the State-funded sector, at present, a typical English Language course comprises fourteen 2-hour classes, which was deemed by a majority of consultees to be an insufficient level of hours to elicit meaningful progress towards proficiency.

Immigrants should not be regarded as being a homogeneous group, therefore the new system should address the needs ranging from the highly qualified immigrant to those with a low educational attainment. It was felt by several consultees that an assessment of proficiency in English should be the starting point for referral to classes, instead of using nationality and background. A majority of consultees recommended that those who complete ELT courses should receive a valid and nationwide/internationally recognised qualification.

5.2.3 Links Between Citizenship and English Language Proficiency

Consultees articulated a range of views on the proposed requirement for non-EU immigrants to have English language proficiency prior to being granted citizenship. Some felt that English Language proficiency should be connected to eligibility for citizenship and the majority are strongly against the connection between English Language proficiency and eligibility to citizenship as they believe it could cause resentment towards the State by sections of the immigrant population. However most emphasised the importance of having English Language proficiency to successfully integrate into Irish society. Consultees noted that for there to be a link between citizenship and English Language proficiency then there would be a requirement for citizenship component within ELT and learning modules.

5.2.4 Barriers to Participation

A majority of consultees felt that motivation techniques should be incorporated into English Language tuition approaches. A strong motivational aspect mentioned was linking classes with vocational content to boost employment prospects.

Consultees considered that ELT should be practical in its focus to appeal to immigrants. In particular, the language student should be clearly able to see why they need ELT i.e., to assist with integration, secure employment, to access state services and so on. Class make-up should reflect the diverse nature of immigrants and participants should be able to choose topics of interest to them to heighten the relevance of the classes. On the other hand, many consultees noted that motivation does not need to be 'artificially introduced' as immigrants are already well-motivated and pro-active in their focus.

A minority of consultees suggested that it should be mandatory for immigrants receiving social welfare to participate in a structured ELT programme (as part of an Employment Action Plan) and for those immigrants who do not participate in classes that sanctions on their social welfare benefits should be considered.

Although the majority of consultees believe motivation does not need to be fostered externally, they believed that barriers to participation need to be reduced. Attendance at ELT courses indicates that some learners incur additional costs such as transport and childcare. Consultees suggested the following methods for reducing barriers; flexible times for classes, e.g., at night or early in the morning to reflect the working patterns of employees, school opening times, flexible access compatible with work, distance/e-learning and they also emphasise the need for clear information.

5.2.5 Qualified Teaching Resource

Consultees generally noted that, at present, English Language teachers in the State funded sector have varying teaching qualifications, some teachers have general literacy training while others have a background in primary school teaching. A strong need articulated by many consultees is that the deployment of qualified teachers for the ELT courses is essential, as is required for the English language schools under ACELS supervision.

Many consultees urged that quality assurance be provided through the accreditation of teachers and institutions. The voluntary sector should not be prevented from engaging in language tuition, however it was noted that language courses provided by volunteer organisations are not quality assured and have no certification.

Consultees suggested that teaching approaches should take account of different levels of language and literacy and be flexible to meet different 'learner motives' for participating in classes. It was recommended by several stakeholders that common standards relating to the different levels of English Language proficiency should be which learners at different competencies should be attaining.

Consultees considered that there is a pressing requirement for systematic capacity-building with nationally agreed standards for tuition, classes conducted on a consistent basis wherever immigrants are receiving tuition. Having appropriate teaching materials is a critical requirement and consultees noted the need for materials to be developed by experts. The development of a common national curriculum framework was recommended by consultees.

The use of online, electronic delivery of English Language material should be used to supplement face-to-face teaching and to overcome barriers where, for example, immigrants are living in a rural location where access to classes is not as convenient as in an urban setting.

5.2.6 The Role of Employers

Consultees had different views on the issue of employers contributing financially towards the employee's English language tuition. It was suggested by consultees that employers should pay for English Language classes for those immigrants where English is required for the job. Many supported the view that employers who bring immigrants in to Ireland on a work permit, should pay for their ELT if necessary.

It was suggested that the payment for ELT should be considered on the basis of who is benefiting from it and who can afford it. For employers operating with low-skilled workers it was felt that employers have little incentive to finance training, as enhanced English language skills among their employees would make it harder to retain them. Many consultees believe tax benefits for employers who train their immigrant employees in English Language could motivate employers to hire immigrants. There was support articulated for utilising the National Training Fund to fund ELT provision.

5.2.7 Funding for English Language Tuition

Consultees felt that there is a strong need for a specific national budget for ELT. Some providers have waiting lists for learners to access ELT courses and this has led to some state-funded providers not being able to meet demand. Consultees felt that financing should originate from a range of entities such as Government, DETE, DES and from immigrants who have a 'well paid' job and who can afford it. A number of consultees indicated that learners want to pay for English Language classes as free provision would devalue it.

At present, VECs provide State funded ELT classes; a number of consultees noted that VECs are not funded to meet the ELT demands placed upon it and the future likely demand for tuition. Some consultees noted that it is important for the State to finance a basic level of English Language education for free.

Consultees generally supported the idea that employers should contribute to ELT if they are employing 'large numbers' of immigrants. Co-financing was felt to be the most pragmatic option by the majority of consultees with contributions from Government, employer and the employee attending the ELT course.

5.2.8 Group Meetings

In addition to the above consultations, the consulting team met with four separate groups of consultees;

1. English Language School Students;
2. Embassy Staff;
3. English Language Schools;
4. Irish Vocational Education Association

English Language School Students

The consulting team met with a group of English Language students from private language schools and those attending courses state-run courses based in the VECs. The private language school attending students were generally full-time students who work part-time but are visiting Ireland for a specific period of time to learn English. They had come to Ireland to study because of the good reputation of the ELT classes. Those students attending VECs for language tuition were generally immigrants working in Ireland full time, typically studying English in their spare time.

Most students would ideally like to attend ELT classes with different nationalities, 1) to reduce the incidence of people from the same country

speaking their own language, 2) to learn English through learning about different cultures.

VEC students generally attend a 90-minute ELT class once a week. This was regarded as being less than adequate to maximise learning progression. The VEC students felt that it was difficult to improve their standard of English having 90 minutes per week of teaching contact time.

Students also felt that a range of visual and audio media should be deployed in a more prevalent manner during ELT classes to 'bring classes to life'. The organisation of 'discussion clubs' were suggested as an additional component to enable students to continue the ELT learning process outside of a 'formal' classroom setting.

The majority of student felt that they have access to good teaching resource spanning the required listening, reading, grammar and oral aspects of ELT. A small minority felt that their teachers' language tuition skills were inadequate.

Embassy Staff

The consulting team invited representatives of the embassies listed below in order to gather their opinion on English Language policy and framework for legally resident adult immigrants;

- Brazil
- China
- India
- Latvia
- Lithuania
- Nigeria
- Philippines
- Poland
- Romania
- Slovakia
- South Africa

Representatives from the Chinese, Indian, Philippine and Polish embassies attended the meeting. Whilst the embassy staff had an awareness of how English Language provision affects the nationals from their countries residing in Ireland, their comments were mainly of a broad nature in relation to language and its role in the integration of immigrants.

In general, the provision of ELT in Ireland is regarded as an area where there is scope for improvement. Many immigrants are not maximising their earning potential because of their low standard of English and it was felt that the economic downturn could leave some displaced immigrants vulnerable to long term unemployment. Language tuition costs are prohibitive for those in entry level or unskilled positions which perpetuates immigrants not being able to gain the language skills required to move up to more rewarding positions of employment.

Some attendees felt that immigrant parents whose children are within the Irish educational system should be encouraged to develop their language competence

to enable them to communicate with their children in English. Where the parent does not have the competence required to speak English with their child this should be remedied via the provision of accessible and inexpensive ELT services.

English Language Schools

The consulting team met with the representative language school organisation MEI RELSA to gather opinion on English Language policy and framework for legally resident adult immigrants. Twelve constituent organisations attended the meeting.

The private language schools have infrastructure in place to help support the delivery of a state-led ELT service to immigrants. Compliance with ACELS standards by MEI RELSA indicates that the schools meet ELT standards as stipulated by the DES. A national system and framework with input from the private colleges would be instrumental in upskilling immigrants. MEI understand that there is a need for flexible options around weekend, evening, early morning provision to enable working immigrants to be able to access flexible ELT at times that suit employees who are working in industries with a variety of work hours.

Many sectors of the economy, but in particular the tourism and hospitality industry which absorbs a lot of immigrants have requirement for investment in ELT. In order for immigrants to progress in their jobs it is necessary to provide them with the tools they require. This is a problem for many immigrants as there are competing factors on their time and money and it is difficult for many immigrants to use their discretionary income on ELT.

Irish Vocational Education Association

The consulting team met with the IVEA to gather opinion on English Language policy and framework for legally resident adult immigrants. Twenty attendees from IVEA and Vocational Education Committees throughout the country providing their input on the new system and framework for ELT.

The main findings from the meetings were that the IVEA sees a clear need for a common curriculum which is consistent with the Common European Framework of Reference for Languages and with the National Framework of Qualifications. It was felt that the new English Language system and framework should have a dedicated source of funding for ELT to ensure that it is not subsumed, as it is currently, into the Adult Literacy Fund. The IVEA identified a need to invest in recruiting teaching resource or upskilling existing teachers, this should be from new funding rather than relying on spreading existing funding thinner.

Investment in ELT can assist immigrants with integration into Irish society. When the immigrant is confident in their ability to communicate in English then this increases their feeling of confidence, security and even, enjoyment of residing in Ireland. The national infrastructure and staffing in place within the VECs would facilitate the introduction of a wide network of ELT locations which would be convenient for both rural and urban-based immigrants. The use of a large number of disparate ELT providers should be carefully considered in terms of control and monitoring of standards.

5.3 Written Submissions

5.3.1 Introduction

This section documents the process carried out with a wide range of stakeholders, who via the national print media, were invited to submit their written opinions about a future system for provision of ELT for legally resident adult immigrants in the Republic of Ireland.

The consultation process was initiated with a notice published in the national press in July 2007 by The Office of the Minister for Integration in conjunction with the Department of Education and Science. Fifty-two written submissions were received. 15 were from English language schools and were almost all identical in their wording. The remainder were from a range of stakeholders including Institutes of Technology and Vocational Education Committees.

The 52 organisations which made submissions are listed below.

Abacus Communications	Galway-Mayo Institute of Technology
Adult Education Officers' Association	GEOS Dublin
Advisory Council for English Language Schools	Grafton College
Alpha College	High Schools International
American College Dublin	Immigrant Council of Ireland
Annalivia School	Information and Support Unit
The Asana School of English	Integrate Ireland Language and Training
Atlantic Language	Ireland City and Guilds
Atlantic School of English and Active Leisure	Irish Vocational Education Association
City of Dublin VEC	Irish Polish Society
Chambers Ireland	Liffey Linguistics
Community Partnership North Fingal	Limerick Language Centre
Cork College of Commerce	Mayo VEC
Cork English College	MEI RELSA
County Dublin VEC	Migrant Rights Centre Ireland
DBL College Ltd	National Adult Literacy Agency
Dublin Business School	North Mon Language Institute
Dublin City Public Libraries	Refugee Information Service
Emerald Cultural Institute	Rehab Group
Emigrant Advice	The Slaney Language Centre
English in Dublin	Swan Training Institute
The English Language Institute	TIE Examinations
Finglas Cabra Partnership	UCD Applied Language Centre
Finglas for Diversity	University of Limerick, Dept. of Languages and Cultural Studies
Galway Cultural Institute	Waterford City Local Employment Service
Galway Language Centre	Welcome English Language Centre

Below, we describe the consultation process, and then examine input received on seven key aspects of English Language policy. These are:

- Legal Framework and overall conditions guiding the provision of language provision;

- Organisational Structure of Language Provision;
- Financial Structure: Resources and mode of financing;
- Auditing, Quality Assurance and Controlling;
- Incentives for immigrants in relation to language provision;
- Pedagogical approaches and course content;
- Links between language provision, the labour market and other integration efforts.

As previously stated, the commentary reflects a distillation of views expressed, rather than a definitive statement of a uniform view of what a future policy should look like. Comments are generally reported where they represent a synthesis of the majority of views expressed and/or provide a consensus.

5.3.2 Overall Impressions

The vast majority of submissions welcome the development of a national English language policy, as the current system is not seen as appropriate, both in terms of organisational structure, and the quality and quantity of service provided. However there was an emphasis on the importance of tapping into the skills and expertise that already exists within the English Language sector for the new system.

There was some disagreement about the most suitable organisational structure and matching quality assurance and auditing system, especially regarding the role of the private English language school sector. However, there is broad consensus that the role of teacher education and career development is critical. The importance of providing classes that reflect the language needs of the students and at times when they can attend was emphasised.

5.3.3 Legal Framework and Overall Conditions Guiding the Provision of Language Tuition

Submissions from organisations representing immigrants generally supported the view that language courses should be accessible and affordable – preferably free – for all immigrants regardless of their legal status. One organisation recommends that language courses be free of charge only for immigrants who have stayed in the country for more than two years, but that courses should also be available for persons who have obtained Irish citizenship but still do not have a reasonable command of the English language.

On the other hand, submissions from a number of private language schools and business organisations were opposed to the concept of free language courses as a right for immigrants. This is because it is seen as a factor which could diminish the motivation of immigrants, as being unfair towards the Irish population, too costly and potentially undermining the private language sector.

Overall most submissions emphasised the importance of gaining proficiency in English to enable immigrants to participate in Irish life, in the work force and for successful integration into Irish society.

There were also a number of references in the submissions to the need for linking English language proficiency and the Irish citizenship process. Most submissions which commented on this area, emphasised the importance of language proficiency but a sizeable proportion did not want language competence directly linked to gaining citizenship since this could be seen as a sanction.

5.3.4 Organisational Structure of Language Provision

Many submissions raised issues about the organisational structure of language provision, i.e., what organisations would deliver language tuition, questions about teacher training, and so on. A number of respondents suggested that there should be a centralised co-ordinating agency, based on the 'ACELS model', to plan, co-ordinate and oversee all ELT provision within the State. One submission suggested that a central language training committee be set up for overall coordination. Another suggested that a co-ordinator should be appointed to co-ordinate provision within each county.

Private and Public Provision

There were a range of divergent views among respondents about organisations and institutions as to which was best placed to deliver ELT.

Private language schools and their organisations strongly stress that a national English language policy should only use recognised English Language tuition facilities, approved by ACELS (Advisory Council for English Language Schools). Furthermore, they underline that the link with the language tuition sector should be through MEI RELSA.

In contrast, other respondents hold the view that a range of existing organisations could play a role in language provision: VECs, FÁS, Institutes of Technology, National Universities, the independent higher education providers, and the voluntary sector. Some submission noted that English Language provision standards should correspond to FETAC quality assurance and accreditation standards.

Some immigrant organisations felt that voluntary groups working with immigrants should play a key role in language provision.

There were a number of submissions noting that learners should be facilitated to access English Language resources via e-learning, distance learning (including radio and TV), podcasts, and in particular libraries. All of these media should be used to reinforce and act as an effective supplement to what is learnt in the class or could be used to enable learners to study independently. One submission noted the role to be played by libraries in supplying a forum for informal studies between immigrants and facilitating people studying English independently.

English Language provision should be driven by the identified needs of the learners. To this end it is important to consult with learners, review and continuously monitor needs and provision to a wide spectrum of learners – immigrant workers, women, older people, disabled people being cognisant of their different levels of English language needs etc. Submissions noted the

need for clarity on who can access publicly funded classes, a number submissions questioned whether EU nationals have a right to attend publicly funded classes.

Training for Language Teachers

There was broad agreement amongst respondents that training and career paths for English Language teachers need to be developed as the need/demand for ELT grows. The recruitment, initial training and continuous professional development needs of English Language teachers should be prioritised. One respondent from an institute of higher education expressed frustration with the (false) notion that 'anyone can teach English' and stressed the need for a stronger academic and professional interest in ELT – a position which is shared by several respondents.

The problems identified with English Language teacher training are two-fold: First, many teachers do not have formal English Language training and second, there is not a clear professional development pathway for teachers, who have chosen to specialise. This reality works as a disincentive for prospective English Language teachers. Specific qualification requirements need to be established for the sector. Private English language schools noted in their submissions that they must comply with teacher qualifications (under ACELS supervision) and they supported the view that all providers should be compelled to comply with these same criteria.

Some respondents noted the importance of training for teachers not just concentrating on ELT content but also on diversity, equality, literacy, anti-racism, and inter-culturalism. It was felt by some respondents that training in diversity should be a key competence for public servants who interact with and serve immigrant clients.

Other Organisational Aspects

Several respondents addressed the overall organisational structure required to oversee English Language Provision for immigrants. It was suggested that a central language training committee be set up for overall coordination, while other respondents perceived the need for a dedicated expert agency based on the ACELS supervisory model.

The issue of childcare provision to encourage women to attend English language courses is raised by several respondents, as it is perceived that the paucity of affordable childcare is seen as a major barrier for immigrant women to participate in language tuition.

A number of submissions covered access to guidance and information to enable learners to establish what services are available. Respondents were supportive of providing access to a service such as the Adult Education Guidance initiative to support learners. Respondents deemed it imperative that ELT provision be marketed so that potential learners know what is available and that such information is made available in a range of languages to ensure the wide dissemination of this information.

5.3.5 Financial Structure: Resources and Mode of Financing

Respondents from the 'commercial private language school sector' generally espoused the need for a comprehensive package of language courses for immigrants. Respondents arguing for free provision courses generally proposed state financing as the most appropriate mechanism.

Placing an onus on employers of immigrants to fund language tuition was raised in several submissions. Although some submissions noted examples of fully employer-financed courses, it is felt that the vast majority of employers would regard this as being prohibitively expensive, and there was support noted by some consultees for the National Employers' Training Fund being used to partly fund some courses, or that the state provide residual funding, when an employer agrees to partly fund a language course. A tripartite approach to funding that involves the State, the employers and learners has also been proposed by several respondents.

Several respondents noted that employers should be consulted with regard to the language needs of their employees so that providers can accurately tailor English language provision to those labour market areas which are most in need of language support.

Several submissions detailed a requirement for a dedicated fund for English language provision with this fund encompassing staff training (teachers and administrators). On a related note, ELT was described as a distinct area of expertise needing dedicated funding, specific job descriptions for professionals, accepted levels of qualification standards and documented skills requirements to operate in the sector.

5.3.6 Auditing, Quality Assurance and Control

The issue of auditing, quality assurance and control is connected to the issue of the organisational structure, and as above, there are differing views expressed.

Several respondents argue that language provision should be closely linked to FETAC accredited language modules, which should also serve as the basis for auditing and quality assurance of language providers. It is argued by some respondents that FETAC accreditation ensures that the training and qualification an individual receives is widely recognised by employers. It was generally felt that there is a need for a common national curriculum framework across providers offering language tuition for immigrants, aligned with the government's overall strategy on immigration and integration.

The need to assess learners when they initially present for classes, while they are learning and to provide them with recognised accreditation on completion of their courses was stressed in many of the submissions. Some respondents from language schools recommended a role for ACELS in quality assurance, using a Test of Interactive English developed in Ireland.

5.3.7 Incentives for Immigrants in Relation to Language Provision

A small number of respondents directly addressed the issues of incentives for immigrants in relation to language provision. Of these, several respondents,

representing immigrant groups, counselled against linking language proficiency to citizenship or long term residence arguing that this could potentially lead to the exclusion of some immigrants. One organisation noted that if such a policy was put in place, it should only be done after a new language provision system has been functioning for a number of years.

5.3.8 Pedagogical Approaches and Course Content

Amongst most respondents there is broad consensus that courses should not focus solely on language, but should also include other topics, such as literacy, learning about Irish culture, how to access and communicate with public services and social engagement to maximise their opportunities to interact and integrate with the local community and thereby minimise isolation. Some language teaching consultees felt that the inclusion of non-classroom based activities is essential – these include taking part in public festivals and performing routine tasks (such as going to the bank) as part of the course. The potential for including e-learning is mentioned by several respondents, one mentions that FAS E-college has already developed a platform that could be used as the basis for an extended integration of e-learning in ELT provision.

The issue of teaching materials is raised by a respondent, who felt that there is an unfulfilled need for Irish-specific material, although there is an abundance of ELT material available which has been developed in the US and UK. It was suggested by several respondents that language teachers should have access to an interactive forum where they can share best practice and have the facility to engage in open discussion to support development.

It was generally felt that provision should be based around a common national curriculum framework based on the Common European Framework of Reference for Languages.

Literacy skills are mentioned in several submissions as an area that lacks focus, as there are marked differences between immigrants, who have no literacy skills, immigrants with only non-Latin literacy skills and immigrants with Latin literacy skills – although they might all be labelled as ‘beginners’. Consultees noted that the range of needs about the pace of learning is diverse. It was felt that some immigrants want to proceed with language learning at a slower pace than others due to educational background, or time constraints.

Some respondents noted the current language courses for immigrants focus overly on basic English skills, and thus fail to provide immigrants with more advanced English skills necessary in much of the labour market. Several consultees signalled a need for a range of courses reflecting the varied needs of learners – workers, parents, women at home, older people, disabled. One respondent argued for inclusion of career advice as an integral part of language courses.

5.3.9 Links Between Language Provision, the Labour Market and Other Integration Efforts

Several submissions, noted the risk of women being excluded from ELT and not accessing courses, mainly because of childcare responsibilities. A number of consultees felt that women play a pivotal role in supporting their children

learning languages and that language provision should focus on reaching out more widely to women in order to facilitate this participation. It was felt by respondents that access to ELT facilitates parents to more actively participate in school activities and improves their children's educational experience.

A number of submissions refer to the need for policy and framework to be linked to relevant agencies outside of the education sector which have regular contact with the immigrant population, such as the HSE, the Department of Social and Family Affairs, the Equality Authority and the National Consultative Committee on Racism and Interculturalism. On a similar note respondents representing businesses were supportive of job-specific language courses being tailored to the needs of the construction and nursing/health sectors. Respondents indicated that these links could be facilitated through the fostering of co-operation between providers and such bodies as IBEC, DETE, FAS etc. at both local and national levels.

5.4 Key Lessons

The key lessons from this chapter are set out below;

- The current English Language system and framework is not regarded as being adequate, both in terms of capacity, and the quality and quantity of service provided.
- The importance of English language proficiency as an enabler to assist the immigrant to successfully integrate into Irish society should inform the above policy.
- ELT should be practical in its focus in order to maximise its appeal to immigrants. The language student should be clearly able to see why they need the language tuition, i.e., to assist with integration, secure employment, to access state services and so on.
- Resources directed at ELT will be recouped indirectly through a more integrated and confident immigrant population. Through their participation in language tuition, immigrants will be more likely, and able, to participate economically to the limits of their abilities rather than being held back through an inability to communicate effectively through English.
- The acknowledged high levels of EU nationals who have poor levels of English language competence is a significant cause for concern and will require both incentives and an effective communications strategy to reach out to those immigrants who do not currently perceive the need to reach a level of language ability required to maximise participation in the labour market and in society generally.
- As part of the incentivisation process to encourage the take up of ELT, State part-funding of ELT may facilitate its timely development. Consultees indicated that immigrants who are EU citizens are less likely to spend money on ELT but they are the immigrant group most in need of ELT.
- Utilising less 'formal' mechanisms such as e-Learning, Public Library facilities, TV programmes etc, will complement and support a class-room approach. All of these 'channels' could be used to reinforce and act as an

effective supplement to what is learnt in the class-room or could be used to enable learners to study independently.

- Existing English Language providers (private, public and NGO/religious providers) would welcome the chance to increase availability of ELT at a wider range of times such as evenings, weekends early mornings and so on. The feasibility of delivering such a service should take into account the downstream value which would be delivered as a result.

The key lessons listed above have informed the Conclusions and Recommendations set out in Chapter 7.

6. SURVEY FINDINGS

6.1 Introduction

This chapter summarises the main findings from a web-based survey carried out from November 2007 until January 2008 with institutions who are either involved in the provision of English Language Tuition (ELT) to immigrants in the Republic of Ireland or have an interest in the provision of ELT. There is more detailed material on the component aspects of the survey in Appendix 4.

This survey results are set out under six main headings listed below.

- Methodology;
- Demand for and Supply of English Language Tuition;
- Profile of the Target Groups;
- Profile of Current English Language Tuition Provision;
- Future English Language Tuition Provision;
- Preliminary Conclusions.

6.2 Methodology

The methodology of the survey is documented below, including an important caveat about the reliability of the results due to the response rate.

306 institutions were contacted and surveys issued, of which 106 partial/complete surveys were submitted. There were multiple surveys completed by a small number of organisations. 98 organisations (plus one individual) participated in the survey. 78 respondents completed all of the survey questions. The response rate may have been partially impacted by VEC staff completing a major survey commissioned by the IVEA on the ELT subject over the same timeframe as the survey reported on in this document.

The 98 institutions plus individual participant which fully/partially completed the survey are listed below;

Abacus Communications	Horner School of English Ltd.
Access Ireland	IBEC
Active Language Learning	Immigrant Council of Ireland
Alpha College of English	Individual participant
Annalivia School	Information and Support Unit for new communities
AONTAS, National Adult Learning Organisation	Institute for Minority Entrepreneurship (DIT)
Atlantic Language Galway	Institute of Technology Tallaght
Avondhu Development Group	Integrate Ireland Language and Training (IILT)
Chambers Ireland	Integrating Ireland
Church of Jesus Christ of Latter day Saints Dublin	Intercultural Interfacing
City & Guilds Ireland	International Study Institute Ireland
City of Cork VEC	Irish Congress of Trade Unions

City of Limerick VEC	Irish Council of Chinese Social Services/Irish Chinese Information Centre
City of Waterford VEC	Islamic Cultural Centre of Ireland
Clare Language Centre	ISME
Clare VEC Adult Education Service	Kerry Education Service
Co-operation Fingal - Partnership	Kildare Community Partnership
Co Cavan VEC	language solutions
Co Cork VEC	Liffey Linguistics
Co Wexford VEC	Limerick Institute of Technology
Co. Donegal VEC - Adult Education Service	Limerick Language Centre
Co. Laois VEC	Lucan Institute of Further Education
Co. Limerick VEC	Mayo VEC Adult Education Services
Co. Meath VEC	MEI RELSA
Co. Monaghan VEC - Adult Literacy	NMLI
Co. Westmeath VEC - Adult Education Service	North Tipperary VEC
Co. Wicklow VEC	One Family
Co.Galway VEC	Polish Information Centre
Construction Industry Federation (CIF)	Rehab Group
Cork English College	Royal Irish Academy
Crosscare Migrant Project	SIPTU Basic English Scheme
D.B.L. College Ltd.	South Tipperary VEC
DCU Language Services	SPIRASI
Dublin Bus	St. Catherine's Community Services Centre
Dublin Business School	Swan Training Institute
Dublin City Public Libraries	Tallaght Intercultural Action
Dundalk Institute of Technology	TARGET
Edgewater College	The Language House School of English
English in Dublin Ltd.	The Slaney Language Centre Ltd.
English Language Ireland	TIE Examinations Ltd
Fingal County Development Board	Tipperary NR VEC
Finglas Cabra Partnership	Trinity College, Dublin
Finglas for Diversity	University of Limerick Language Centre
Galway Adult Basic Education Service	University of Ulster
Galway Language Centre	Vincentian Refugee Centre
Galway Refugee Support Group	VTOS Programme
Galway-Mayo Institute of Technology	Waterford Institute of Technology
GEOS Ireland	Welcome English
Health Service Executive	Yeats Language School
High Schools International	

The response rate for **completed surveys** was 25.5%, with the breakdown of respondents as follows:

- Of the institutions that answered the questionnaire, 76.2% provide English language courses while 23.8% do not provide English Language tuition at all.
- The institutions that provide language tuition comprise 30.4% private tuition organisations, 31.6% VEC, 24.1% other types of institutions, 11.4% non-governmental organisations (NGOs), and 2.5% Integrate Ireland Language Training institutions.

From these results, it is obvious that the market for language courses is diverse, as the 24.1% “other types” of institutions consist of a wide range of different organisations, ranging from university language providers, via church and trade union providers, to web-based distance learning organisations.

This diversity is also reflected in the answers of the institutions that do not provide courses: only 36% of them are NGOs, while 64% are other types of organisations replicating the same diversity as the course providers. Thus, a broad range of institutions have answered the questionnaire, highlighting the heterogeneous composition of course providers in Ireland.

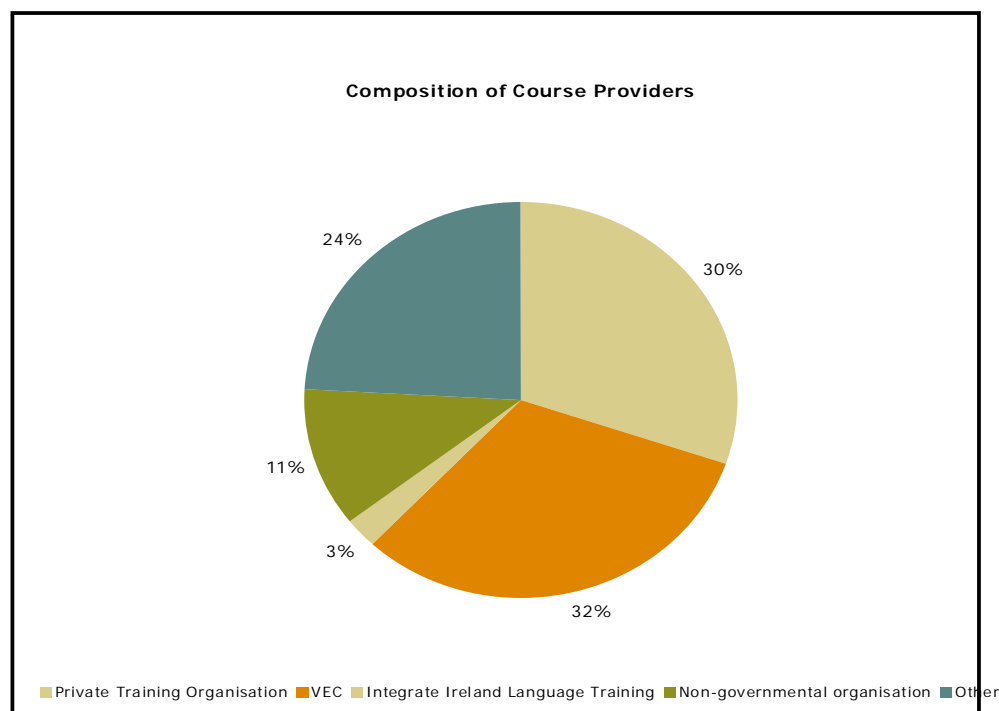


Figure 6.2 – Composition of Course Providers

With regard to the geographical spread and hence the provision of language courses throughout Ireland, a balanced picture can be drawn, as on average approximately 20% of all course providers offer courses in each county. The only exception to this is Dublin, where over 53% of all course providers provide language courses. This is not unexpected, as most immigrants in Ireland live in and around Dublin.

Interpreting the survey results

When interpreting the results of the survey, it is important to keep in mind that the survey is of an exploratory nature, i.e., it gives important insight into the attitudes and opinions among relevant stakeholders, but is not based on a statistical sample from a well-defined section of the population.

Given the length of the survey, the response rate of 25.5 % is not necessarily low but, nevertheless, it does influence how reliable the data are as an

expression of the opinions among all stakeholders invited to take part. The IVEA had conducted a separate survey on the subject of ELT amongst its own members shortly before the survey being reported on in this document and this may explain why only 17 of the 33 VECs responded to the survey documented below.

6.3 Demand for and Supply of English language tuition

The general picture, which has emerged from the survey, is one of an imbalance in the demand for, and supply of, language tuition in Ireland. Demand is reported to currently exceed supply of courses, regardless of the target group or geographical location (county/town) of the course providers. This is evident in the fact that over 70% of all respondents to these questions declare the provision of language tuition to all groups to be very important, while on average about a similar percentage of the same respondents judge the present supply of language courses as insufficient.

The demand for English language tuition is a key aspect which will inform the new English language policy, it has two components:

- Those requesting tuition and searching for classes, and
- Those with a perceived need to take part in language classes, who do not look for classes themselves and might not feel the necessity to participate.

Both groups exist in Ireland and require different approaches to be incorporated in the new policy. The first group, above, require offerings in terms of class hours, costs and travel time, the second group above require these aspects and additional motivation and incentives to take part in classes.

In order to estimate the demand for English language tuition, we have undertaken two analyses:

- Survey among course providers and other stakeholders
- Analysis of 2006 census data in combination with research undertaken by ESRI (set out in Section 4.2)

Due to lack of data (not registered or only temporarily staying EU citizens, illegal immigration etc.), it is difficult to forecast or assess the actual figure of immigrants that plan to stay in Ireland for the long term. Furthermore, as there is no continuous language testing for immigrants, the overall level of English proficiency is similarly difficult to judge.

Both analyses do not claim full accuracy but point commonly in one direction – that there is a very high demand for English language tuition.

This becomes evident in the fact that up to 85% of all respondents to these questions declare the provision of language tuition to all groups as very important while on average about 70% of the same respondents judge the present supply of language tuition as insufficient.

According to respondents all target groups are affected equally by the current situation as the demand for English Language tuition for all target groups by far exceeds the assessed supply. This situation is also generally reflected in that there is the same gap between supply and demand prevalent in both town and county areas. However, the imbalance between supply and demand is, in general, more pronounced in urban than in rural areas.

A large majority of respondents assess the overall situation as one in which demand for languages courses exceeds the current supply of courses regardless of the target group or an urban/rural division. The demand being experienced by the respondents is the demand from the group actively seeking courses. *As mentioned above, there is a further potential demand from groups which need language training, but are not actively seeking it.*

The key group, both in the census-based analysis and in the survey, is the group of immigrants from EU-countries, because this group is by far the largest of all the discrete immigrant groupings. This is important to take into consideration when deciding a new policy, as this group differs from other groups in terms of the legal requirements that can be applied, i.e. language tuition cannot be made mandatory for EU citizens not receiving welfare benefit payments.

6.4 Profile of the Target Groups

6.4.1 Introduction

The survey covered institutions reporting a total enrolled population of 19,824 students, excluding non-EU nationals in Ireland on a student visa and people for whom no legal status was given. The legal status of these students and the training institutions in which they were students are set out in Table 6.4.1 below.

Legal status of students enrolled in responding training institutions						
	Private training organisation	VEC	Integrate Ireland Language Training	Non-governmental organisation	Other	Total
Refugees	28	812	876	297	305	2,319 (12%)
Asylum-seekers	21	771	0	155	11	958 (5%)
EU nationals (Visiting students and immigrants)	7,508	4,214	0	116	1,410	13,247 (67%)
Work permit holders from non-EU countries	941	610	0	5	221	1,778 (9%)

Legal status of students enrolled in responding training institutions (cont'd)						
	Private training organisation	VEC	Integrate Ireland Language Training	Non-governmental organisation	Other	Total
Irish for whom English or Irish is not their native tongue	0	4	0	0	76	80 (0%)
Illegal residents	13	0	0	2	2	17 (0%)
Spouse/ Family Members of non-EU worker (holder of work permit)	114	148	0	6	83	352 (2%)
Spouse/Family Members of EU Citizen	327	113	0	6	100	547 (3%)
Spouse/Family Members of Irish Citizen	150	12	0	0	366	528 (3%)
Total	9,101 (46%)	6,683 (34%)	876 (4%)	588 (3%)	2,576 (13%)	19,824

Table 6.4.1 – Legal Status of students enrolled in English Language tuition

Note: The numbers above are calculated based on the institutions' information of the total number of students enrolled and their estimate of the distribution of these students across the legal statuses. All numbers are therefore approximate.

EU nationals are by far the largest group, comprising more than two-thirds of all language students, followed by refugees (12%), work-permit holders from non-EU countries (9%), and asylum-seekers (5%). It should be noted that the group of EU nationals might include persons who are in Ireland primarily to study English, with no intention of settling or working in Ireland. Due to the freedom of movement and settlement of EU citizens in Ireland, it is impossible to separate this group from other EU nationals.

Figure 6.4.1 above illustrates where the previously mentioned four biggest group of immigrants are taught English. As can be seen, VECs cater for the needs of each of the four groups, and educate the vast majority of asylum-seekers, but also provide tuition to around one-third of the students in the other categories.

Private tuition institutions are mainly teaching EU nationals, but it is also interesting to note that private institutions are the predominant language institutions for work permit holders from non-EU countries, although this group only account for about 10% of the private language institutions' students.

Integrate Ireland Language Training train refugees, but nevertheless the majority of refugees receiving language tuition are trained outside the auspices of IILT. The group of 'other' providers predominantly consist of language training institutions connected to universities; this group plays a minor but not insignificant role in education for all groups except asylum-seekers.

6.4.2 Barriers to Participation

We now look at the reasons articulated as to why some do not complete tuition or never take up a course at all. The reasons for not participating or failing to complete a course are primarily of a practical nature, such as lack of spare time, lack of access to childcare facilities or lack of access to night-time or weekend courses. Cultural factors or a lack of perceived necessity play minor roles. This does not mean that such factors could not feature as barriers in language provision in Ireland at a later stage, but currently there is a significant group of immigrants who would participate in language tuition given a solution to the practical obstacles they face.

The main reasons for immigrants not participating in English language tuition reveals can be grouped under two headings

- Costs, both direct costs and indirect costs;
- Other barriers.

In Table 6.4.2 below, the issues which influence why respondents do not to take part in language tuition are ranked according to importance.

Ranking*	Issue: Why do people not take part in English Language tuition?	Very important	Somewhat important	<div> <div>Very important</div> <div>Somewhat important</div> <div>Not important</div> </div>
1	Lack of free time due to employment	47.40%	44.30%	
2	Lack of access to affordable childcare facilities while attending English Language tuition	53.60%	33.00%	
3	Lack of available information on English Language tuition and providers in a number of languages	37.60%	48.40%	
4	Lack of awareness that English Language tuition is available	30.10%	54.80%	
5	Lack of free time due to caring responsibilities	34.40%	50.00%	
6	Cost of English Language tuition	52.10%	31.20%	
7	Lack of flexible delivery models, e.g., morning, evening and weekend English Language tuition	47.40%	34.70%	

Ranking*	Issue: Why do people not take part in English Language tuition?	Very important	Somewhat important	<div> <div>Very important</div> <div>Somewhat important</div> <div>Not important</div> </div>
8	Lack of access for English Language tuition in local community e.g. deficiencies in public transport provision	38.10%	42.30%	
9	Lack of English Language tuition relevant to current needs	36.50%	43.80%	
10	Absence of a requirement for compulsory English Language tuition	37.90%	37.90%	
11	Lack of prior educational attainment	16.70%	57.30%	
12	Lack of availability of English Language tuition relevant to cultural needs	24.20%	44.20%	
13	Lack of relevance of English Language tuition to current employment or prospective employment	17.00%	51.10%	
14	Perceived lack of necessity for English language tuition	8.70%	44.60%	
15	Reasons of gender	7.50%	34.40%	
16	Lack of interest in English Language tuition	6.50%	34.40%	
17	Lack of cultural acceptability of English Language tuition	10.60%	28.70%	

*Ranking based on sum of 'very important' and 'somewhat important'.

Table 6.4.2 – Barriers to Participation

The main barriers are lack of affordable child-care and the cost of tuition. Cost is therefore a major issue, with the important addition that it is necessary to look beyond direct cost and take indirect costs, such as child-care, into consideration.

Practical considerations hindering participation are lack time, lack of proper information about the courses and lack of access due to time issues and transport issues.

It is worth noting that cultural motives of participants are deemed of little importance by respondents.

Reasons of gender, the lack of cultural acceptability of English, the perceived lack of necessity for English and the lack of interest in English are all reasons which are regarded by respondents as being of peripheral importance.

However, reasons of gender and the lack of cultural acceptability of English are viewed by those institutions not providing language courses as somewhat more important than by the course providers.

Moreover, the reason “lack of availability of English Language Tuition relevant to cultural needs” is judged by the course providers as rather less important while the other type of institutions view this reason as an obstacle to the participation of immigrants in language courses.

It is important to note that the data here only builds on responses from institutions, not from prospective participants. It is therefore not safe to conclude that factors such as cultural issues, gender, lack of interest or a perceived lack of necessity are not relevant to the development of an English language policy. What can be concluded, however, is that there are many immigrants with a genuine interest in learning English, who are currently prevented from participating in English language tuition due to a number of barriers of a predominantly practical nature.

The results indicate that increasing the appeal of English Language tuition amongst the immigrant population would have to take place in two steps. The survey results indicate the existence of a significant group of immigrants, who want to access language courses, but are currently not enrolled.

1. The first step would consist of including the group of people, who fail to access courses because of costs or practical barriers – in other words, ‘opening the door’ for immigrants.
2. The second step would be to include the immigrants who for reasons of culture or lack of perceived need do not access courses, even though they have been made accessible.

6.5 Profile of Current English Language Tuition Provision

We describe the existing supply of courses and relate it to the identified demand in the previous section and the identified capacities in the existing system. Additionally, we illustrate the costs and current funding practices of the course providers as well as their teachers’ education. Finally, we highlight the course providers’ practices regarding educational approaches, tests and exams.

About half of the respondents answered the questions concerning the provision of courses in the two different time periods: **“September 2006 to June 2007”** and **“July 2007 to August 2007”**.

September 2006 to June 2007

- Respondents conducted a total of 1,619 language courses
- VECs provided most courses, followed by private training organisations

July 2007 to August 2007

- Respondents conducted a total of 895 courses
- ‘Other’ organisations provided most of the courses, followed by private training organisations

September 2006 to June 2007 + Period July 2007 to August 2007

- Most of the offered language courses are either day classes or night classes
- The amount of weekend and early-morning classes is only half or less of the day and night classes offered in both time periods

English Language Tuition - September 2006 to June 2007					
Beginner Courses	Early Morning Classes	Day Classes	Night Classes	Weekend Classes	Total
Private training organisations	2	47	26	9	84
VEC	23	96	152	44	315
Integrate Ireland Language Training	0	30	0	0	30
NGO	1	2	1	0	4
Other	40	55	45	42	182
Total	66	230	224	95	615
Intermediate Courses					
Private training organisations	4	103	52	3	162
VEC	23	69	83	33	208
Integrate Ireland Language Training	0	7	0	0	7
NGO	0	2	2	0	4
Other	40	58	44	40	182
Total	67	239	181	76	563
Advanced Courses					
Private training organisations	3	55	30	0	88
VEC	28	54	52	31	165
Integrate Ireland Language Training	0	0	0	0	0
NGO	0	1	0	0	1
Other	40	52	54	41	187
Total	71	162	136	72	441

Table 6.5 (a) – English Language Tuition; September 2006 – June 2007

English Language Tuition - July 2007 to August 2007					
Beginner Courses	Early Morning Classes	Day Classes	Night Classes	Weekend Classes	Total
Private training organisations	2	63	21	0	86
VEC	0	13	9	4	26
Integrate Ireland Language Training	0	28	0	0	28
NGO	1	0	1	0	2
Other	41	56	5	42	144
Total	44	160	36	46	286
Intermediate Courses					
Private training organisations	4	108	31	0	143
VEC	0	2	2	0	4
Integrate Ireland Language Training	0	7	0	0	7
NGO	0	0	1	0	1
Other	40	60	43	40	183
Total	44	177	77	40	338
Advanced Courses					
Private training organisations	3	62	24	0	89
VEC	0	2	2	0	4
Integrate Ireland Language Training	0	0	0	0	0
NGO	0	1	0	0	1
Other	40	57	42	40	179
Total	43	122	66	40	271

Table 6.5 (b) – English Language Tuition; July 2007 – August 2007

The current provision of courses is marked by an extensive supply of day and night courses; however, this still does not meet the identified demand. Moreover, there exists a lack of early-morning and weekend courses. Nonetheless, some of these gaps (day and night classes) can be balanced by existing capacities within the course providers. The gaps regarding early-morning and weekend classes probably cannot be addressed by the existing capacities of the course providers.

Based on survey returns there is an indication that the current numbers of courses provided may not be sufficient to meet the demand for English language tuition. However it must be stressed that this tentative finding is based on a

relatively small survey population. A more definitive finding in this area would only be possible through the commissioning of an extensive survey of a much larger number of English Language tuition providers.

6.6 Additional capacity for English Language Tuition

The survey also explored additional capacity which could be provided by language course providers. The gap between current provision and the required amount of tuition (expressed in the survey) could, to some degree, be met through the existing capacity of course providers.

In relation to day and night classes, course providers could offer additional classes. In terms of early morning and weekend classes course providers indicate less capacity (or less interest) whereas survey respondents made – among others – a lack of course time flexibility responsible for low participation. It is important to note, however, that additional courses would not equal a better regional coverage of tuition offerings.

Figure 6.6 (a) below illustrates where the four biggest group of immigrants are taught English.

The largest immigrant group, EU-nationals, are receiving tuition in private training institutions, followed by the VECs.

In terms of student composition, VECs, private institutions, Integrated Ireland Language Training (IILT), NGOs and other providers differ significantly:

- VECs are teaching each of the four groups, and educate the vast majority of asylum seekers, but also around one third of EU nationals, Work permit holders from non-EU countries and refugees respectively.
- Private training institutions provide language tuition to a majority of EU-nationals and work permit holders from non-EU countries. (The latter account for about 10 % of the private language tuition institutions' students.)
- Integrate Ireland Language Training only train refugees, but nevertheless the majority of refugees in receipt of language tuition are trained outside IILT.
- The group of 'other' providers predominantly consist of language tuition institution connected to universities and plays a minor, but not insignificant role in educating all groups, except asylum seekers.

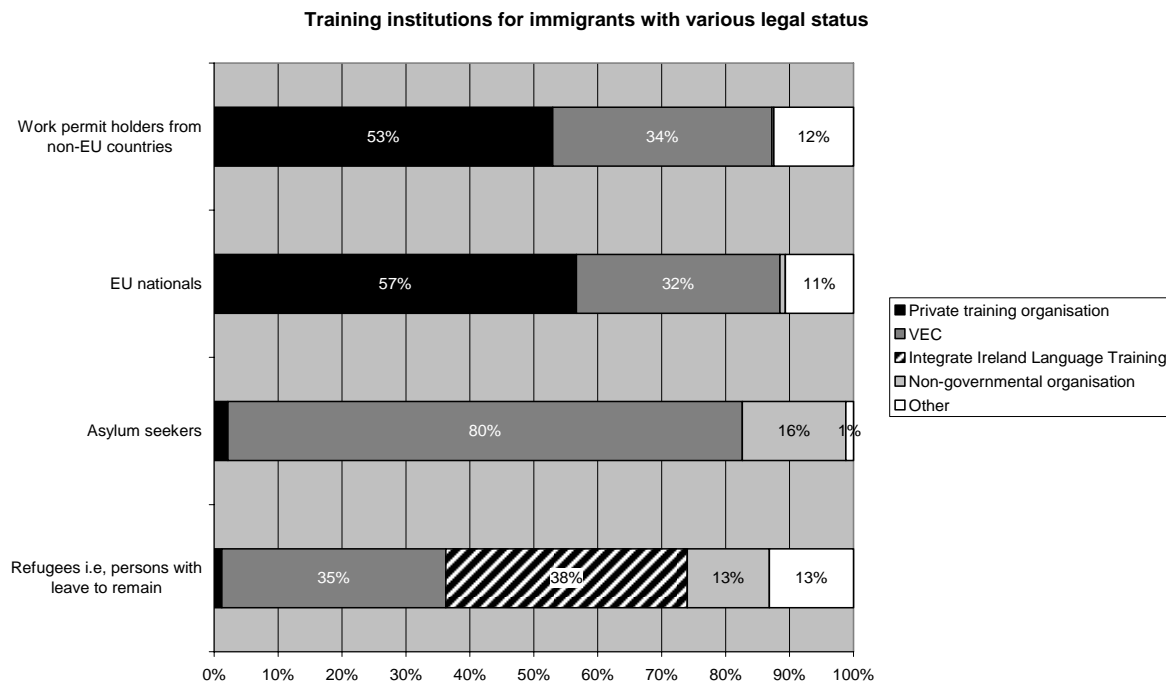


Figure 6.6 (a) –English Tuition Locations

Figure 6.6 (b) below illustrates the geographical origin of the students. For technical reasons, it is not possible to separate the students residing in Ireland on a student visa when looking at geographical origin, therefore the figure covers all students.

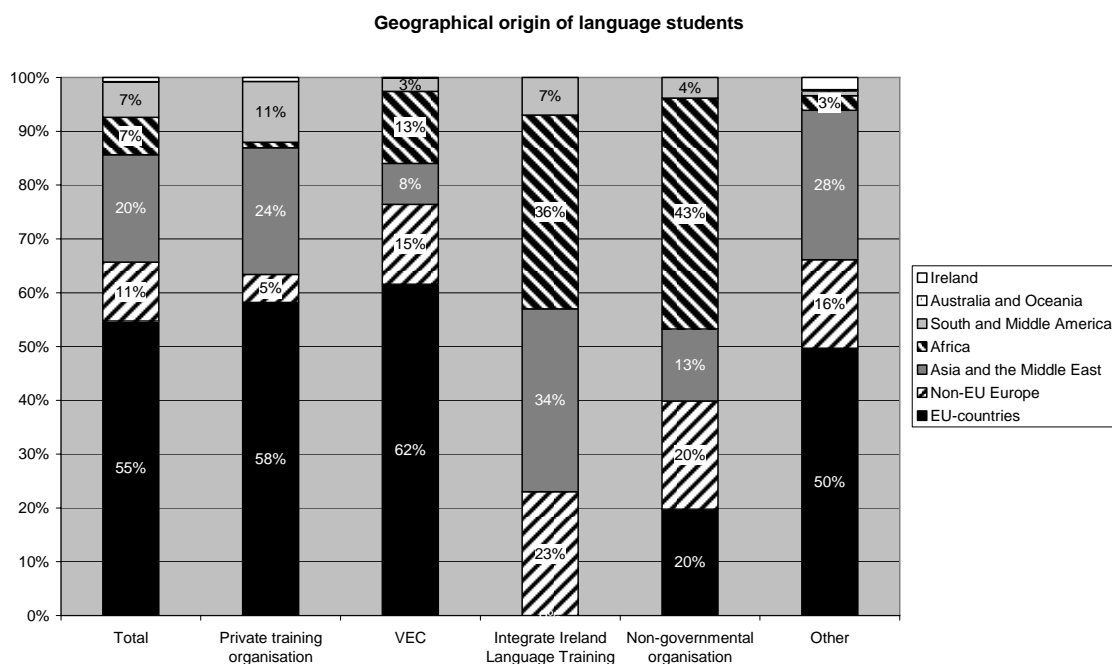


Figure 6.6 (b) – Geographical origin of students

6.7 Future English Language Tuition Provision

There is generally strong support for positive incentives and measures such as making access to language education a right, while the picture is more mixed when it comes to making language education mandatory or connecting language proficiency to citizenship (supported by a small minority) or right to seek employment (almost evenly split). The support for access to courses for free or a nominal fee is substantial, although there is also strong support for some kind of means testing of immigrants.

Regarding the organisation of language provision, there is agreement that there should be a separate funding stream for ELT (that is, split from the Adult Literacy and Community Education Scheme), but divergence among stakeholders between private language schools all favouring a central role for ACELS, while VECs and other stakeholders generally favour FETAC taking a similar role (this split was also represented in the face-to-face consultations).

The results above indicate that the new system will be one characterised by a very significant demand from mostly EU immigrants, and with several different kinds of suppliers of language courses.

A key dimension in a new system is the rights and responsibilities that immigrants would have in relation to language courses.

A majority, 56.4 %, of the survey respondents feel that attendance at language tuition and proven language skills should in some way be linked to determination of citizenship and residency status.

The support for this link is strongest among organisations providing English Language Tuition, while a plurality (40%) of organisations not providing language tuition are opposed to such a link.

Linking language proficiency to the right to seek employment is more contested, with 38.5% approving such a link and 41.0% opposing it.

There is support for creating positive incentives towards both employers and immigrants making it more attractive for the immigrants to take language courses. This contrasts with less support indicated for the introduction of sanctions for employers and immigrants which would penalise them should immigrants not take language courses.

In particular, there is limited support for sanctions against immigrants. However, a strong minority of 43% thought that language courses should be made mandatory for refugees, and as can be seen there is also above 20 % support for this option for work permit holders from non-EU countries, asylum seekers and EU-nationals.

With the exception of illegal immigrants, a plurality of respondents preferred guaranteed access for all groups. The general view among all respondents is,

as illustrated in the figure below⁵², that there should be a guaranteed access to courses for immigrants with no or limited English language proficiency. It is worth noting that, with the exception of illegal residents, there is very little support for not providing immigrants with the right to access language training.

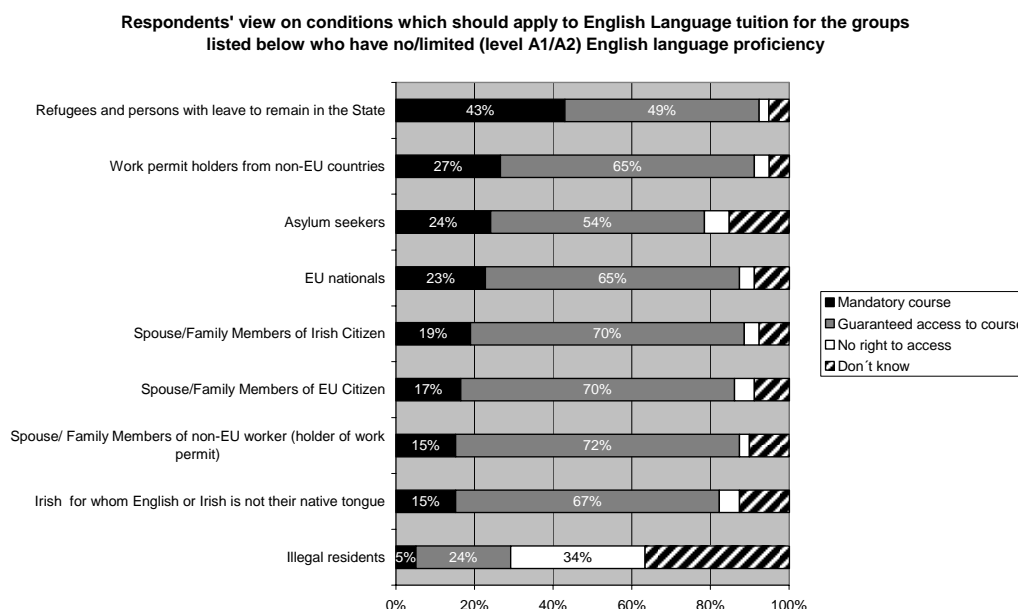


Figure 6.7 – Conditions to be applied to future English Language tuition

6.8 Funding for Language Tuition

There is strong support for free language courses for refugees and asylum seekers, with more than 60% of respondents providing this opinion. There is also considerable support for free courses for Irish citizens with no or limited English language proficiency.

Of the alternatives to free courses, there is substantial backing for offering courses for a nominal fee, especially for economic immigrants (EU-nationals and non-EU-nationals with work permit) and their family members. In general, only a small number of respondents favour total self-financing, the proportion being greatest in relation to economic immigrants, where 23% of respondents think they should finance courses themselves.

⁵² The figure is based on responses from both language institutions and non-language institutions. There is a greater tendency for language institutions to be in favour of mandatory courses.

Respondents' view on how English Language tuition should be funded for the groups of immigrants listed below who have no/limited (level A1/A2) English language proficiency?

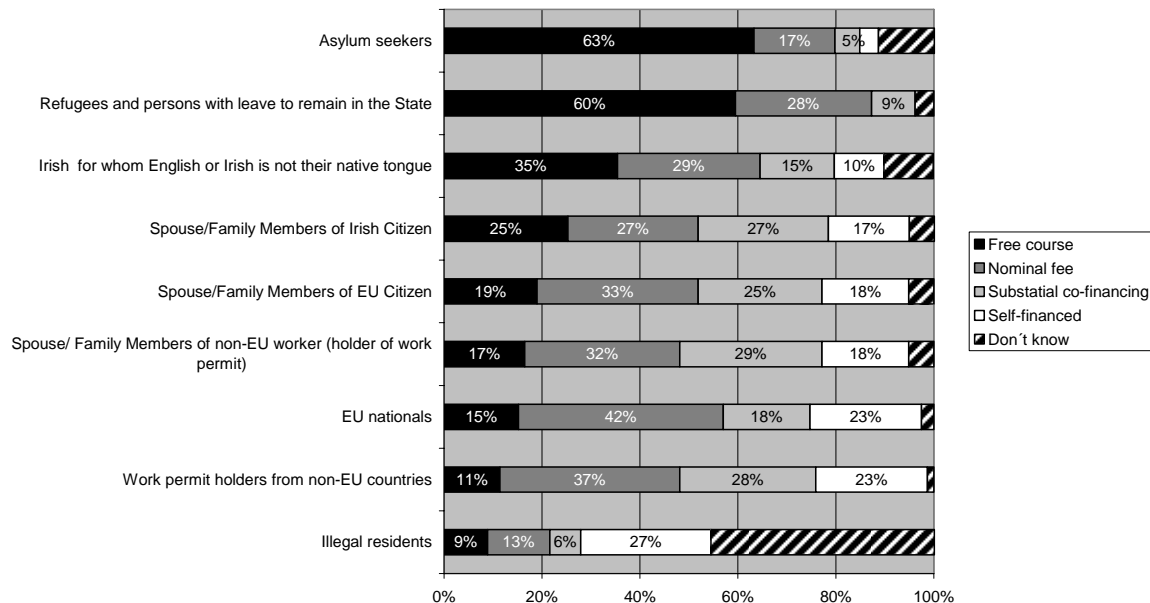


Figure 6.8 (a)– English Language Tuition Funding

As EU-nationals are by far the largest group of immigrants, it is worth taking note of the responses regarding this group.

There is strong support for guaranteeing EU-nationals access to a course, with only limited support for making it mandatory (as mentioned above, it is in fact not legally possible to make language classes mandatory for EU-nationals, although participation could be linked to social welfare entitlements etc).

However, support for offering courses for free is limited, and the rest of the respondents were evenly split between, on the one hand, those who prefer only a nominal fee, and on the other hand those who prefer that the EU-nationals pay full or a substantial part of the cost. It should be added that there is general support for looking at the immigrants' financial and professional background when deciding on funding, e.g., 53% think that publicly funded courses should be means-tested, this is opposed by 25.6% of respondents.

There is support for a model of provision for EU-nationals based on a guaranteed access to a language course in exchange for a fee, which would be determined based on a means-testing of the immigrants, going from nominal to fully self-financed. An interesting aspect, which has not been addressed in the survey, is the approach to take when dealing with EU-nationals with low English skills, who are claiming benefits due to a possible future increase in the unemployment rate amongst this group.

Another key question in designing a language policy is setting the target level for language tuition, i.e., what level immigrants in publicly funded or supported language courses should be reaching for.

Respondents generally favoured designing courses to reach an 'independent user' level (B1/B2), using the Common European Framework of Reference for Languages⁵³. However, respondents differed in their assessment of the average amount of hours of tuition needed to obtain this, relatively high, level of proficiency. The number of hours is also likely to vary widely across age groups and educational backgrounds, even for immigrants starting from the same level of English language proficiency.

There is strong support for some kind of development of English Language Tuition **programme content**. Among organisations providing English language tuition, 82.8% would welcome such support, with less than 7% of respondents opposing it.

Regarding course content, there is strong support for combining language tuition with other kinds of learning, as can be seen below. There is a strong desire to see language tuition combined with teaching immigrants how to conduct basic tasks such as filling out tax forms, accessing health care etc. There is also strong support for combining language tuition with other forms of learning suggested, such as Irish culture and history, rights and duties of immigrants and the Irish political system and democracy.

Should English Language provision be combined with other types of learning?

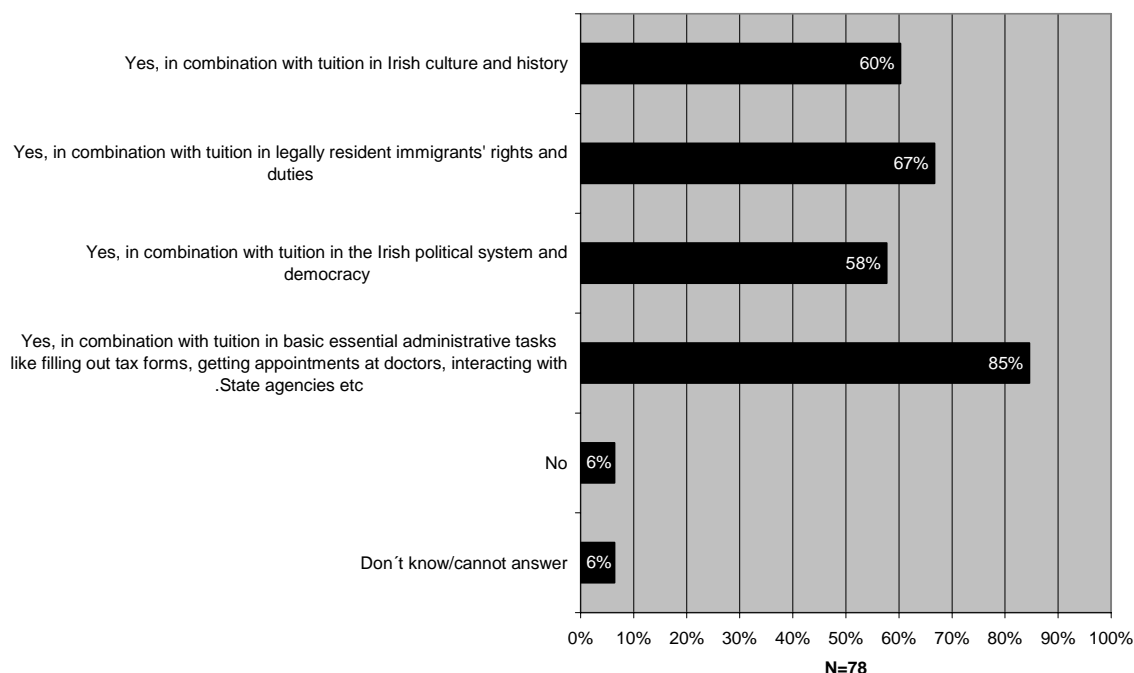


Figure 6.8 (b) – Combining English Language tuition with other learning

⁵³ The Common European Framework of Reference for Languages operates with six levels, from A1 to C2. A description can be found on the Council of Europe's website: http://www.coe.int/t/dg4/linguistic/default_en.asp

The way English language tuition is funded is evidently an important dimension of a new system. Currently, State funding of English for speakers of other languages is through the Adult Literacy and Community Education Scheme budgets. The respondents' comments on this arrangement differed somewhat between the different categories of respondents, although there is general agreement that the current system is deficient.

Among *private training institutions* (13 respondents) there was general dissatisfaction with the arrangement. The majority thinks that funding either should be provided via other channels, or that the current funding stream should be opened up to private training institutions.

Amongst VECs (18 respondents) there is total agreement that the current system with no separate funding stream is insufficient. The responses from VECs are evenly split between a minority who prefers to keep ELT-funding within the overall Adult Literacy and Community Education Scheme, but with a separate funding stream, and a majority, who think it should be separate. The current budget is deemed insufficient, and there is agreement that a separate funding stream must not be developed by splitting the current funding for the Adult Literacy and Community Education Scheme in two. There is some concern that the current arrangement leads to competition among two equally deserving groups.

Other respondents (16 respondents) also share the view that the current system is generally insufficient and that there should be a separate funding stream. Two respondents make the point that there is a huge difference in the motivation among the two target groups currently covered by Adult Literacy and Community Education Scheme funding. Whereas immigrants in need of ELT actively seek training, adults in need of literacy classes are much harder to reach. Conflating the funding for these two groups might therefore lead to a greater focus on the easier-to-reach target group.

Organisational Aspects

Attitudes towards a future organisational set-up pose challenges. We asked respondents about what organisations they thought should be in charge of different aspects of an English language provision system for immigrants. The questions were asked as open questions, that is, the respondents were free to put in any organisation and did not have to choose from a list.

Whilst private training institutions prefer a significant role for the Advisory Council for English Language Schools (ACELS), the VECs in general prefer a greater role for the Further Education and Training Awards Council (FETAC), especially within quality assurance. These results are consistent with the outcome of the consultation phase.

6.9 Summary of Findings

6.9.1 Introduction

A summary of findings from this section is set out below:

6.9.2 Learning Population

Ireland's immigrant population is not a homogeneous one for whom a single solution will fit all of their requirements for English Language tuition. The analysis conducted indicates that there is a rich diversity of immigrant nationalities whose discrete ELT needs will need to be met. The major defining difference for ELT about the status of immigrants is between EU immigrants who cannot legally be mandated to partake in ELT, and non-EU immigrants for which mandatory ELT classes may be considered as an option to promote the agreed standard of proficiency. It can be assumed that the largest demand will come from immigrants from EU-countries, because this group is by far the largest of all the discrete immigrant groupings.

Our survey indicated that there is a general consensus that immigrants in a future system should either have guaranteed access to a language course or that it should be mandatory – that is, there is virtually no support for immigrants not having a right to access, with the exception of illegal immigrants. Support for mandatory basic English Language tuition is strongest for refugees.

6.9.3 Factors influencing Participation

The main reasons put forward to explain why immigrants are not participating or failing to complete a course are primarily of a practical nature, such as the cost of tuition, lack of available spare time, lack of access to childcare facilities, transport issues or lack of access to night-time or weekend courses. These are all issues which are potentially complex to overcome and are outside of the remit of this study. However the required roll-out of additional night-time and weekend classes is the most easily tackled of the above factors, through incentivising providers to deliver tuition hours at these times during the week in addition to their current offerings.

6.9.4 Capacity for Language Tuition

Whilst respondents to the survey indicated that in their experience demand for ELT is greater than the current supply capacity, ELT providers articulated the capacity for additional teaching capacity which could be made available subject to clarity from the Government about sufficient funding to support the development and roll-out of this additional tuition capacity. From a practical perspective it will be necessary to build on existing capacity amongst private and public providers currently available to ensure that tuition could be provided within the framework of a future ELT programme for immigrants.

A primary consideration for any future system with greater numbers of students requiring English Language tuition is the adaptability of VECs to the requirements of students – can they deliver sufficient volumes of additional tuition outside of core hours i.e., at night, early in the morning to reflect the working patterns of employees? The funding of VEC language tuition and their

current models of delivery and ability to deliver in the future consistent with requirements of immigrants are critical components to be addressed in a future English Language system.

6.9.5 Funding for Language Tuition

There is a consensus amongst those we surveyed that courses should be free or offered for a nominal fee to refugees and asylum-seekers, while the picture is less clear for other immigrants groups. Refugees can attend free English Language classes to improve their English. Free classes are provided by Integrate Ireland Language and Training, VECs also run English language classes for refugees. Asylum seekers can access State-funded English classes.

There is general agreement that some form of means-testing should be employed when deciding whether an immigrant should be offered a course which is fully or partly publicly funded. Publicly funded English language courses should, according to the vast majority of respondents, have their own funding stream, and not be part of the general literacy programme.

There was support articulated for a model of provision for EU-nationals based on a guaranteed access to a language course in exchange for a fee, which would be determined based on a means-testing of the immigrants, going from nominal to fully self-financed.

A generally open system of language provision will be a costly means to deliver language provision and should be reflected against the background of prevailing and future budgetary constraints.

6.9.6 Delivery of Language Tuition

Respondents generally agree that ELT should be combined with other course content, with especially strong support being given to combining language classes with education in carrying out essential administrative tasks necessary for communicating with authorities, filling out tax forms, accessing health care etc. There is also strong support for combining language tuition with other forms of learning suggested, such as Irish culture and history, rights and duties of immigrants and the Irish political system and democracy. The IILT publications “Feach” and “Anseo” contain much of the information thus minimising the resource impact of this facet of English Language tuition.

Regarding the target level, most respondents favour aiming for a level of n ‘independent user’ (B1/B2). The respondents’ assessment of how many hours this would require differ to such an extent that it is impossible to draw any firm conclusions.

A majority of stakeholders suggest an ideal target level of B1 or B2 according to the Common European Framework of Reference for Languages, which is a high level compared to that aimed for by other jurisdictions. Respondents’ assessment of how many hours this would require differ to such an extent that it is impossible to draw any firm conclusions.

6.9.7 Organisation of Language Tuition

Co-ordinating an ELT programme for a large group of disparate immigrants will require a strong, well-resourced mechanism dealing with all aspects of ELT. While there is, as described, general consensus about key parts of a future system, there is little consensus about the organisational set-up, particularly regarding the roles of ACELS and FETAC. The private language schools seem to favour a predominant role for ACELS in accreditation, quality control and assessment, while other organisations, including VECs, see FETAC taking on a leading role in this area.

There was strong support from respondents to the survey for some kind of support with the development of ELT programme content. The co-ordinating organisation will require a Government Department to act as its 'sponsor' and to whom it will be accountable.

When targeting immigrants within an English language policy a new system based on the current provision should consider the role of VECs and private institutions as providers of language tuition.

7. CONCLUSIONS AND RECOMMENDATIONS

7.1 Introduction

This report indicates that there is a robust case for the development of a formalised English Language system and framework for legally resident immigrants in Ireland. Within this section, the findings and analysis in the preceding chapters are used to inform the development of options for a new system and framework and the selection of a preferred option.

7.1.1 Structure

This chapter is structured under five areas:

Section 7.1 - Key caveat and assumptions for the study

Section 7.2 - Contextual information on drivers for the introduction of an English Language system and framework

Section 7.3 - Key criteria forming the basis for an English Language system and framework

Section 7.4 - Description of options for consideration and English Language system criteria and recommendation for the preferred option

Section 7.5 - Next steps to progress the preferred option

7.1.2 *Caveat –accuracy of figures relating to immigrants who do not have level A2 language competence*

Within the parameters of this piece of work it has not been feasible to quantify in exact detail the numbers of immigrants who need English Language Tuition (ELT) to A2 level (see 7.1.3 for definition). There is a lack of existing reliable data on English Language competence level of immigrants. In order to establish this figure it would require a reasonably large-scale survey/research exercise. It is legitimate to assume that a significant number of immigrants lack even basic skills of English language knowledge (level less than A2 according to the European Framework of Reference).

Since 2000, the number of immigrants arriving into Ireland each year has consistently exceeded 50,000 with a significant increase in immigration particularly in 2005 and 2006. Immigration patterns into the future will need to be reviewed in the light of economic developments that could result in a reduction in the rate of immigration due to less favourable employment prospects in Ireland for migrants.

In Chapter 4, (Section 4.3) it is estimated that of the approximately 225,000 adult immigrants from the new EU-countries, Eastern Europe, Africa and Asia registered in the 2006 census, approximately 75,000 immigrants were deemed to be in the category of those immigrants needing language training. Current State-sponsored ELT infrastructure, primarily located in the VECs, is not currently sufficient to provide this quantum of immigrants with ELT.

7.1.3 Assumptions made in this study

- **English Language competence of A2/FETAC Level 3 equivalent** is the accepted standard at which the student has a functional competence in

the English Language as set out in the Common European Framework of Reference for Languages:

- “Can understand sentences and frequently used expressions related to areas of most immediate relevance (e.g. very basic personal and family information, shopping, local geography, employment). Can communicate in simple and routine tasks requiring a simple and direct exchange of information on familiar and routine matters. Can describe in simple terms aspects of his/her background, immediate environment and matters in areas of immediate need.”
- **200 hours ELT for beginner to reach A2 level of competence.** This number of hours is taken as the best estimate English Language competence of A2 /FETAC level 3 is the accepted standard at which the student has a functional competence in the English Language as set out in the Common European Framework of Reference for Languages. The most practical approach to delivery would be a course of 4 hours (2 x 2 hour classes) of tuition over 50 weeks i.e., tuition carried out over one calendar year. However there would need to be a flexible approach from providers to cater for students who may wish to accelerate their learning into a more compressed timescale.
- **€12.40 per hour cost of tuition** is an average hourly rate from a sample of Irish-based public and private ELT organisations/bodies.
- **English Language system; 5,000 additional publicly funded places.** This would be a challenging but attainable number of publicly funded EL places to be provided by the VEC sector on top of the 12,000 places currently available throughout the VEC network. It would provide a meaningful number of immigrants with ELT and would form the basis for a robust evaluation exercise to ascertain the effectiveness of the tuition, impact on learners, performance of schools and teachers. Pre and post ELT testing would need to be an integral part of the new English Language system.
- **Cost estimate** - estimating costs for ELT could be undertaken by multiplying the number of participant hours by the indicative hourly rate. In our assumptions this would be **5,000 students x 200 hours x €12.40 = €12.4m.**

There are a range of other considerations which are central to the development and delivery of the English Language system and framework.

- Project Management to establish the new system and framework;
- Development of ELT Materials and ELT Curriculum consistent with NFQ/FETAC standards;
- Development of Testing tools – pre and post tuition;
- Development of Accreditation Criteria for Teachers;
- Monitoring processes for ELT Qualifications;
- Development of Performance Monitoring/Control/Assessment tools for schools/teachers;
- Development of ‘Informal’ Materials;

- Development of Citizenship Module;
- Development of Supporting Administration to track progress of immigrants through the system, links from DES to VECs and links from DES to DJELR in relation to citizenship and residency matters impacted by language competence;
- Development of Evaluation Process to assess the effectiveness of the English Language system.

It would be prudent to assume that there will be a significant outlay in addition to the ELT outlined above. Given the wide range of activities involved and human resource input into supporting processes and administration it could be assumed that these could amount to **30% of the estimated outlay on ELT**. This would represent an additional sum of **almost €4m** giving a total indicative outlay of in excess of **€16m to deliver 5,000 ELT places** and all of the supporting assistance required to operationalise the system. Naturally when the system is operational there will be significantly reduced outlay on project management or development of the new curriculum and so on.

7.2 Context – why should Ireland invest in English Language Tuition?

Growth in Immigration and links to Economic Development

Section 4 of this report documents figures on recent immigration trends in Ireland. Since 2000, the number of immigrants arriving into Ireland each year has consistently exceeded 50,000 with a significant increase in immigration in 2005 and 2006. Ireland's population of 4.17 million includes, according to the latest conducted census in 2006, approximately 420,000 immigrants (over 10% of the total population). Future estimates of immigrants needed in the coming years to sustain economic development may need to be tempered in the light of ongoing economic patterns which could result in a reduction in immigration due to less favourable employment prospects in Ireland for migrants.

OECD Findings

The OECD, in its recent Economic Survey of Ireland, 2008, notes that the impact of migration has been assessed in several OECD Economic surveys and that *“knowing the language is crucial for successful integration”*⁵⁴. Language is key to social cohesion, active participation in society and key to understanding and accepting national culture.

Immigration, Residence and Protection Bill, 2008

The Immigration, Residence and Protection Bill recommends that immigrants who are seeking long term residence in the State or citizenship should “demonstrate in such a manner as may be prescribed a reasonable competence for communicating in the Irish/English language”⁵⁵. However, in practice, this relates primarily to non-EU immigrants who form the minority of the overall total of immigrants.

⁵⁴ OECD, Economic Survey of Ireland, 2008

⁵⁵ Immigration, Residence and Protection Bill, 2008

International Experience

Evidence from other countries suggests that A2 is the minimum target level that facilitates subsequent independent language acquisition.⁵⁶ Ireland's English Language system and framework should be consistent with the standards set out in the NFQ and be aligned to FETAC levels.

Benefits for Immigrants

The acquisition of language skills has positive long-term benefits for immigrants:

- Enhanced language skills leads to improved job opportunities;
- There is a potential for higher earnings for those immigrants with a reasonable command of English;
- EL competence by parents can lead to enhanced educational opportunities for 'second generation' immigrants.

7.3 English Language System and Framework – List of Key Criteria

7.3.1 Introduction

The key criteria which should be contained in an English Language System are described below in the Section 7.3.2 below. *All of these criteria are significant considerations and are not listed below in order of their importance.*

1. Supports Legal Framework
2. Organisational Structure of Language Provision
3. Financing Language Tuition
4. Quality Assurance and Control
5. Incentive Structures and Sanctions
6. Course Content and Pedagogical Approach
7. Integration into the Labour Market

7.3.2 Supports Legal Framework

Consistent with the Common Basic Principles on Immigrant Integration Policy in the EU the provision of language programmes should be considered in the context of the promotion of participation and integration amongst all groups within Irish society. Most of the EU countries documented in Section 3 of this document have mandatory language policies in place for non-EU immigrants and immigrants receiving welfare payments. However there is little scope to mandate EU immigrants attending language classes in an EU jurisdiction where they are participating economically.

The English Language system and framework should be developed being cognisant of the statutory objectives relating to language competence and application for long term residence and citizenship as set out in the Immigration, Residence and Protection Bill, 2008.

⁵⁶ For example the integration courses in Denmark, Sweden and Germany aim at a targeted level of B1 while in Austria and the Netherlands they aim at targeted level of A2.

7.3.3 Organisational Structure

The key facets of the organisational structure needed to support the English Language system are set out below:

- **VEC Infrastructure** - The English Language system and framework should utilise the VEC's national infrastructure in place for ELT. This is for ELT up to A2 standard.
- **Teaching Hours** - 200 hours of tuition should be provided to enable beginners to reach A2 level, this is the commonly held base-line number of hours which equip the English learner at beginner level to attain A2 competence.
- **Curriculum** - A common English Language curriculum framework should lead to consistency in all geographical areas and ensure that the immigrant receives the same basic education no matter what institution is attended. It should leave an amount of flexibility to providers, but still function as an overall framework for state-funded or supported provision
- **Testing/Examination** - Independent, standardised test for assessment prior to and after commencing language tuition should be developed and be accredited by FETAC. Testing should be conducted by an independent body to ensure integrity of the process. Testing should assess the level of competence on the European Framework.
- **Teacher accreditation** - Teacher accreditation should be linked closely with proven levels of teaching competence consistent with the NFQ framework. A transition period could be put in place, setting a date after which all teachers must fulfil certain accreditation requirements; however, it is important that the final criteria are known as soon as possible, in order for current and prospective teacher to plan for accreditation.
- **Provision above A2** – This should be available through such channels as the VEC, private language schools and other providers as necessary. There is a key role for providers of English Language Tuition from A1 to C2 level on the European Framework.
- **Complementary Techniques** - the English Language system and framework should be complemented by less formal teaching methods such as:
 - E-learning and conversation groups in libraries
 - DVDs and other formats of language tuition support
 - Government-funded homepage with self-directed learning; podcasts etc
 - Courses offered on radio and TV-channels targeting the immigrant population
 - NGO involvement in informal tuition
 - Private sector resources as appropriate.

7.3.4 Financing Language Tuition

ELT up to A2 level of competence (equivalent to FETAC level 3) should be state-funded. Partial funding from the student for tuition received would increase the perceived value attached to ELT by the student.

The State should not fund ELT above A2, this should be funded privately by the student, their employer or from other private sources of funding.

7.3.5 Quality Assurance and Control

A system should be established to monitor performance and outcomes of ELT providers. These standards should conform to those set out in the NFQ/FETAC qualifications framework.

7.3.6 Incentive Structures and Sanctions

Should the immigrant receive sanction to attend publicly funded ELT but does not attend an agreed number of classes or does not sit exams, then fees should be recouped and notification made to the relevant authorities that the immigrant has been non-compliant. Where the immigrant is funding their own ELT, he/she should be able to claim tax credits for expenditure on ELT.

7.3.7 Course Content and Pedagogical Approach

Classroom teaching – all jurisdictions reported on in this document (see Section 3) have introduced comprehensive language/integration systems. Classroom based language provision is the approach widely used to equip immigrants with the necessary linguistic skills to enable them to function capably within society. This approach is generally adopted as it cannot be assumed that language acquisition will happen by itself through the experience of living (and working) in the ‘new’ country. Classroom-based tuition is a proven approach for the effective attainment of language competence.

Complementary Techniques - the English Language system and framework should be complemented by less formal teaching methods such as:

- E-learning and conversation groups in libraries;
- Government-funded homepage with self-directed learning; podcasts etc;
- Courses offered on radio and TV-channels targeting the immigrant population;
- NGO involvement in informal tuition.

7.3.8 Integration into the Labour Market

ELT should be practical and focused on mobilising the student to participate in the labour market. Where the student is working, then the focus should be on improving their standard of English Language to help maximise their potential within the employment arena.

7.4 Models/Options

7.4.1 Introduction

The key Options for an English Language System are set out below in summarised format and described in greater detail in the more detailed tables that follow. Five options are identified in this paper:

- Option 1 - Current approach ; 'As-is' ELT
- Option 2 - Current approach + introduction of new Informal Teaching Methods
- Option 3 - A2 level publicly funded classroom-based tuition
- Option 4 - A2 level publicly funded classroom tuition + Informal tuition methods
- Option 5 - 'Open access' to ELT

7.4.2 Options for English Language System

The table below sets out the high level summary of the Options.

	Summary of Options
Option 1	'As-is' ELT –the status quo as described in this document is maintained. None of the best practice outlined from other jurisdictions is adopted and Ireland maintains its current 'ad hoc' approach to ELT
Option 2	System based on current provision (as Option 1) with the provision of informal Teaching Methods, for example. <ul style="list-style-type: none"> ▪ E-learning and conversation groups in libraries ▪ Government-funded homepage with self-directed learning; podcasts etc ▪ Courses offered on radio- and TV-channels targeting the immigrant population ▪ NGO-involvement in informal tuition
Option 3	<ul style="list-style-type: none"> ▪ A2 level classroom-based tuition ▪ 200 hours of publicly funded A2 tuition ▪ 5,000 places available per annum ▪ The immigrant could pay a nominal fee per hour towards cost of tuition to defray on ELT costs
Option 4	<ul style="list-style-type: none"> ▪ A2 level classroom based tuition plus structured use of Informal Teaching Methods ▪ 200 hours of publicly funded A2 tuition ▪ 5,000 places available per annum ▪ The immigrant could pay a nominal fee per hour towards cost of tuition to defray on ELT costs <p>PLUS Informal Teaching Methods, for example.</p> <ul style="list-style-type: none"> ▪ E-learning and conversation groups in libraries ▪ Government-funded homepage with self-directed learning; podcasts etc ▪ Courses offered on radio- and TV-channels targeting the immigrant population ▪ NGO-involvement in informal tuition
Option 5	<ul style="list-style-type: none"> ▪ 'Open access' to publicly funded ELT ▪ A2 ELT is made available to all immigrants. Informal methods of ELT used to support class-room tuition. ▪ 200 hours of publicly funded A2 tuition at €10 per hour ▪ Privately funded ELT - above level B2 ▪ Unrestricted number of places available per annum for A2 ELT

Table 7.4.2 – English Language System – Summary of Options

7.4.3 Options Described against System Criteria

In the table below each of the options is described against the EL system criteria. *All of these criteria are significant considerations and are not listed below in order of their importance.*

	Option 1 As-Is System Private, public and NGO ELT provision partially funded by the student	Option 2 System based solely on existing provision and Informal Teaching Methods	Option 3 Classroom Based system – Pilot to Assess Demand	Option 4 Classroom based system with Complementary Teaching Material - Pilot to Assess Demand	Option 5 System where ELT available to all
Legal Framework	The current English language system for immigrants as described in Section 4.12 has developed over time to meet an evolving need. The current system and framework does not incorporate specific reference for non-EU immigrants to meet future citizenship/residency stipulations linked to language competence.	The current English language system for immigrants as described in Section 4.12 has developed over time to meet an evolving need. The current system and framework does not incorporate specific reference for non-EU immigrants to meet future citizenship/residency stipulations linked to language competence.	Consistent with the Common Basic Principles on Immigrant Integration Policy in the EU the provision of language programmes should be considered in the context of the promotion of participation and integration amongst all groups within Irish society.	Consistent with the Common Basic Principles on Immigrant Integration Policy in the EU the provision of language programmes should be considered in the context of the promotion of participation and integration amongst all groups within Irish society.	Consistent with the Common Basic Principles on Immigrant Integration Policy in the EU the provision of language programmes should be considered in the context of the promotion of participation and integration amongst all groups within Irish society.
Organisational Structure of Language Provision	There are currently no formalised and codified Teaching Hours, Curriculum Development, pre and Post Tuition Testing and Teaching Accreditation	As with the current systems there would be no formalised and codified Teaching Hours, Curriculum Development, pre and Post Tuition Testing and Teaching Accreditation	The target-level of A2 should be set in the pilot phase to formally position it as the basic level to be targeted in the new system Formalised and codified Teaching Hours, Curriculum Development, Pre and Post Tuition Testing and Teacher Accreditation Responsibility for oversight with DES as VECs would be implementing it. Co-operation with the administration of the literacy fund would be prudent.	The target-level of A2 should be set in the pilot phase to formally position it as the basic level to be targeted in the new system Formalised and codified Teaching Hours, Curriculum Development, Pre and Post Tuition Testing and Teacher Accreditation Responsibility for oversight with DES as VECs would be implementing it. Co-operation with the administration of the literacy fund would be prudent. To develop additional tuition material, close cooperation with FETAC needed.	A2 is the basic level to be targeted in the EL system. B1/B2 ELT may be introduced with scope for immigrants to receive assistance from the State to fund more advanced tuition. Formalised and codified Teaching Hours, curriculum Development, Pre and Post Tuition Testing and Teaching Accreditation Large numbers of applicants for tuition likely to make organisation of the system cumbersome

Table 7.4.3 – Options description against English Language system criteria

	Option 1 As-Is System Private, public and NGO ELT provision partially funded by the student	Option 2 System based solely on existing provision and Informal Teaching Methods	Option 3 Classroom Based system – Pilot to Assess Demand	Option 4 Classroom based system with Complementary Teaching Material - Pilot to Assess Demand	Option 5 System where ELT available to all
Financing Language Tuition	<p>There is no dedicated state funding for ELT. Consistent with National Skills Strategy (NSS) – The State should fund education up to Level 4 FETAC. A2 is Level 3 FETAC and therefore should be funded.</p>	<p>There is no dedicated state funding for ELT. Consistent with NSS – The State should fund education up to Level 4 FETAC. A2 is Level 3 FETAC and therefore should be funded.</p>	<p>Contribution made by EU nationals and Non-EU nationals who are active in the labour market towards their EL tuition. However, this would require a means assessment of applicants School/ teacher accreditation linked to the NFQ framework. A transition period should be put in place, setting a date after which all schools/ teachers must fulfil rigorous accreditation requirements.</p>	<p>Contribution made by EU nationals and Non-EU nationals who are active in the labour market towards their EL tuition. However, this would require a means assessment of applicants School/ teacher accreditation linked to the NFQ framework. A transition period could be put in place, setting a date after which all schools/ teachers must fulfil rigorous accreditation requirements.</p>	<p>This option envisages state funding to A2 level EL tuition for all immigrants who wish to participate. Given uncertainty over current numbers of immigrants who require this level of tuition it is difficult to forecast accurately the financial impact.</p>
Quality Assurance and Control	<p>Private language schools are supervised by ACELS. Teaching in VECs not supervised on a systematic basis.</p> <p>There are no clear, consistent quality standards in place for ELT courses as providers currently operate under a wide range of different internal/external standards.</p>	<p>Private language schools are supervised by ACELS. Teaching in VECs not supervised on a systematic basis.</p> <p>There are no clear, consistent quality standards in place for ELT courses as providers currently operate under a wide range of different internal/external standards.</p>	<p>School/ teacher accreditation linked to the NFQ framework. A transition period should be put in place, setting a date after which all schools/ teachers must fulfil rigorous accreditation requirements.</p> <p>Development of a framework curriculum for ELT provision under the oversight of FETAC.</p>	<p>School/ teacher accreditation linked to the NFQ framework. A transition period should be put in place, setting a date after which all schools/ teachers must fulfil rigorous accreditation requirements.</p> <p>Development of a framework curriculum for ELT provision under the oversight of FETAC.</p>	<p>School/ teacher accreditation linked to the NFQ framework. A transition period could be put in place, setting a date after which all schools/ teachers must fulfil rigorous accreditation requirements.</p> <p>Development of a framework curriculum for ELT provision under the oversight of FETAC.</p> <p>Where private institutions deliver classes, further control mechanisms will be needed.</p>

	Option 1 As-Is System Private, public and NGO ELT provision partially funded by the student	Option 2 System based solely on existing provision and Informal Teaching Methods	Option 3 Classroom Based system – Pilot to Assess Demand	Option 4 Classroom based system with Complementary Teaching Material - Pilot to Assess Demand	Option 5 System where ELT available to all
Incentive Structures and Sanctions	Informal incentives in place; the immigrant who wishes to progress in the labour market will wish to develop their EL proficiency	Informal incentives in place; the immigrant who wishes to progress in the labour market will wish to develop their EL proficiency	While this models builds on voluntary participation, the government might in the long run want to consider introducing mandatory elements, especially if a subset of immigrants show no particular motivation to learn the language or on welfare entitlement criteria.	While this models builds on voluntary participation, the government might in the long run want to consider introducing mandatory elements, especially if a subset of immigrants show no particular motivation to learn the English Language or on welfare entitlement criteria.	System open to all who want State funded A2 ELT provision. Universal access on a voluntary basis.
Course Contents and Pedagogical Approaches	Classroom based tuition complemented by informal methods is currently the most popular and robust approach in terms of learning outcomes	Classroom based tuition complemented by informal methods is currently the most popular and robust approach in terms of learning outcomes Access to e-learning and conversation groups in libraries. Government-funded homepage with self-directed learning; podcasts. Courses offered on radio- and TV-channels targeting the immigrant population. Facilitating NGO-involvement in informal tuition	Provision of classroom based A2 level EL tuition Classroom based tuition complemented by informal methods is currently the most popular and robust approach in terms of learning outcomes	Provision of classroom based A2 level EL tuition Access to e-learning and conversation groups in libraries. Government-funded homepage with self-directed learning; podcasts. Courses offered on radio- and TV-channels targeting the immigrant population. Facilitating NGO-involvement in informal tuition	As Options 3 and 4 and in addition, for courses going beyond A2, other elements could be included in the courses, such as culture, rights etc. This is done in many other countries, ref. Section 3.

	Option 1 As-Is System Private, public and NGO ELT provision partially funded by the student	Option 2 System based solely on existing provision and Informal Teaching Methods	Option 3 Classroom Based system – Pilot to Assess Demand	Option 4 Classroom based system with Complementary Teaching Material - Pilot to Assess Demand	Option 5 System where ELT available to all
Integration into the Labour Market	<p>Current ad-hoc content provision does not align labour market requirements with ELT</p>	<p>Current ad-hoc content provision does not align labour market requirements with ELT</p> <p>The addition of informal teaching methods, networking events, use of multi-media modes of communication, and so on, can be used to target at immigrants useful information about vocational/job opportunities</p>	<p>English language proficiency of immigrants should be at a level which enhances integration processes. From a social perspective as well as from a labour market view, better English skills will enhance the immigrant's contribution to Irish society, workforce and life.</p> <p>For people receiving social welfare, FAS will need to play an active role by incorporating ELT-courses in their active labour market policies. Create a framework where ELT is taught in relation to specific labour market language and requirements (e.g. construction).</p>	<p>English language proficiency of immigrants should be at a level which enhances integration processes. From a social perspective as well as from a labour market view, better English skills will enhance the immigrant's contribution to Irish society, workforce and life.</p> <p>The addition of informal teaching methods, networking events, use of multi-media modes of communication can be used to target opportunities at immigrants</p>	<p>English language proficiency of immigrants should be at a level which enhances integration processes. From a social perspective as well as from a labour market view, better English skills will enhance the immigrant's contribution to Irish society, workforce and life.</p>
OVERALL ASSESSMENT	<p>The current system has little evidence of best practice characteristics seen in international language systems, as set out in Chapter 3. It is not fit for purpose across all of the criteria which should characterise the new system.</p> <p>Maintaining the status quo would lead to a significant number of immigrants left with tuition needs not being met.</p>	<p>A system aimed at beginners which is solely based on such alternative delivery methods as TV, libraries, internet has not been tested in the country language systems described in this report.</p> <p>It would not meet the criteria which should characterise the new system and would lead to a significant number of immigrants left with tuition needs not being met.</p>	<p>The provision of a set number of ELT places is a positive start to the new system and framework. It will not ensure all applicants receive tuition but it is a solid basis for a system and framework and is a manageable number of students to evaluate the service</p> <p>Providing an adequate ELT service which meets the 'best practice' criteria of a system is a solid foundation for addressing the ELT needs of immigrants.</p>	<p>Providing an adequate ELT service which meets the 'best practice' criteria of a system is a solid foundation for addressing the ELT needs of immigrants.</p> <p>Alternative learning arrangements can accompany classroom based tuition and could be a good approach for intermediate learners to improve on their EL competence.</p> <p>An approach which factors in different levels of English proficiency and a combination of learning methods is desirable.</p>	<p>This option has the positive aspects of Options 3 and 4 but is a non-runner due to its cost impracticalities and the strain which 'free universal access' to ELT would place on the providers.</p>

7.4.4 Assessment of Options against System Criteria

In this section each of the above five English Language system options is assessed against the criteria below which form the basis of a future English Language system. *All of these criteria are significant considerations and are not listed below in order of their importance.*

1. Supports Legal Framework
2. Organisational Structure of Language Provision
3. Financing Language Tuition
4. Quality Assurance and Control
5. Incentive Structures and Sanctions
6. Course Content and Pedagogical Approach
7. Integration into the Labour Market

To assess the options we have used a simple colour-based system (*green, amber and red*) set out in the box below;

Does the option meet the criteria necessary for a successful English Language system?	Colour Coding
<i>Meets the English Language system assessment criteria</i>	
<i>Partially meets the English Language system assessment criteria</i>	
<i>Meets few/none of the English Language system assessment criteria</i>	

The table below documents how the options measure up against the EL system criteria. This is followed by commentary on how the five options measure up against the criteria and rationale for the assessment. *All of these criteria are significant considerations and are not listed below in order of their importance.*

	Option 1 As-Is System Private, public and NGO ELT provision generally funded by the student	Option 2 System based solely on existing provision and Informal Teaching Methods	Option 3 Classroom Based system – Pilot to Assess Demand	Option 4 Classroom based system with Complementary Teaching Material - Pilot to Assess Demand	Option 5 System where ELT available to all
Legal Framework					
Organisational Structure of Language Provision					
Financing Language Courses					
Quality Assurance and Control					
Incentive Structures and Sanctions					
Course Contents and Pedagogical Approaches					
Integration into the Labour Market					
OVERALL ASSESSMENT	<i>Partially meets one criterion</i>	<i>Partially meets a small number of the system criteria</i>	<i>Meets most of the system criteria</i>	<i>Meets most of the system criteria</i>	<i>Meets several system criteria but impractical due to funding and organisational drawbacks</i>

Table 7.4.4 – English Language System and Framework - Option Assessment against Criteria

Commentary on the assessment of the Options

Option 1 is the current system. It does not fully address any of the criteria selected but is provided for comparison purposes. It partially meets the Quality Assurance criterion as a number of the private language schools are currently overseen by ACELS.

Option 2 is the current system 'As-is' plus informal teaching methods, it fails on several criteria. It is assessed to be an unsuitable option on all but the Quality Assurance criterion as a number of the private language schools are currently overseen by ACELS. Investment in EL teaching provision via audio, print and digital teaching materials will not be realised where it is merely 'bolted on' to the current ad-hoc provision. Option 2 would be economically expedient as it would involve little additional investment on top of current ELT provision but would represent a false economy as the level of EL competence amongst the target audience would register little discernible improvement from the status quo situation.

Option 3

Of the 'change oriented' options, the third option would be the most expedient one to select as it is based solely around 'class-room' tuition within the State education apparatus. There would be no requirement to develop informal tuition delivery methods. The system and framework would meet the Legal Framework criterion. The target level of A2 would be consistent with best practice in terms of the required base-line competency for students and be aligned to FETAC standards, meeting the Organisational Structure criterion. All providers/teacher would be required to be accredited.

Testing/assessment would be under close State supervision meeting the Quality Assurance and Control criterion. The system would incorporate voluntary participation, primarily due to resourcing issues, this would partially meet the Incentives Structure and Sanctions criterion. The pilot would allow there to be an objective evaluation and assessment as to the value/feasibility of mandatory participation.

Option 4

Option 4 with 'class-room' tuition and supporting 'informal' methods of EL tuition would be the **preferred option** as it would incorporate the rigour of formal delivery with methods such as aural, digital and print delivery. There would be a 'ripple effect' to the wider immigrant population from this material and this would leverage the spend on the development of this material by reaching a wider audience than the classroom tuition participants.

The system and framework would meet the Legal Framework criterion. The target level of A2 would be consistent with best practice in terms of the required base-line competency for students and be aligned to FETAC standards, meeting the Organisational Structure criterion. All providers/teacher would be required to be accredited and testing/assessment would be under close State supervision meeting the Quality Assurance and Control criterion.

The provision of 5,000 additional ELT places as set out in Option 4 will not satisfy the demand from all immigrants, therefore it also recommended that there should be consideration given to the provision of tax relief to immigrants on ELT fees in line with tax relief provided to taxpayers regarding other educational-related fee outlay. This would encourage immigrants to participate where they receive a percentage of their fee spend back in the form of tax relief/credits.

Option 5

This option does not meet two key criteria; Financing and Organisational Structure. This option in which publicly funded ELT is made available to all is not a sensible option on several fronts, most particularly this would represent an 'open-cheque book' for ELT. In addition, there is a dearth of supply-side capacity (i.e., within the language schools) to satisfy the needs of all immigrants who wish to avail of publicly funded ELT. The financial implications of universal access to state-funded A2 ELT could impose a large burden on the State and the administrative burden involved in overseeing the system would be a massive and undefined undertaking.

7.5 Next Steps

The next steps in the formulation, development and implementation of the English Language system and framework are focused on the development of the constituent parts of the preferred **Option 4**, which are set out below:

- Liaison between DES and VECs on resourcing the system and framework;
- Development of ELT Materials;
- Development of ELT Curriculum;
- Development of Testing tools – pre and post tuition;
- Development of Accreditation Criteria for Teachers and NQF compliance;
- Monitoring processes for English Language Teaching Qualifications;
- Develop Performance Monitoring/Control/Assessment tools for schools/teachers;
- Development of 'Informal' Materials;
- Development of Citizenship Module;
- Development of supporting administration to track progress of immigrants through the system, links from DES to VECs and links from DES to DJELR in relation to any citizenship and residency matters impacted by language competence;
- Development of Evaluation Process to assess the effectiveness of the English Language system and framework.

These activities represent a significant undertaking and will require financial/staffing resource to be made available to ensure that the constituent parts of the system and framework are fully considered and resourced.

In addition there needs to be consideration about how ELT can be delivered in the most cost effective manner and where possible to consider defraying costs for DES in its delivery. For example, DES should avail of National Training Fund resources to fund ELT dedicated funding for immigrants. There should be consideration given to the introduction of a levy on employers in construction, hospitality and retail sectors, in which there are large concentrations of immigrants with lower levels of English competence. Tax relief on ELT fees paid by immigrants should be considered as a key component to reduce the net cost to the immigrant thus making investment in ELT more attractive.