The 'everywhere and nowhere' English language policy in Queensland government schools : A license for commercialisation

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Abstract

The paper explores the policy logics of privatisation through service provision for students with English as an Additional language or dialect (EAL/D) in the state education system of Queensland, Australia. In the context of EAL/D, specifically targeted policy has been subsumed by a broader umbrella or meta-policy of inclusion, whilst at the same time, funding support for EAL/D learners is substantial. The devolution of EAL/D support to individual schools through autonomous targeted funding results in policy 'everywhere', distributed across broad portfolios dedicated to ensuring schools provide quality education services for all learners, but also 'nowhere', lacking systemic support and detail on how inclusion should be enacted for EAL/D and with no accountability placed on schools to demonstrate that they are addressing EAL/D learner needs. The co-location of EAL/D policy with a broad systemic policy of inclusion, the absence of systemic professional support, combined with devolution to school sites has had real effects on the policy in practice. The analysis demonstrates there is the potential opening of EAL/D provision to market forces at school sites, where the private sector can potentially sell commercial 'solutions' directly to schools, which have greater autonomy over one-line budgets.

Keywords

Introduction

The policy focus of this paper is the provision of English as an Additional language or dialect (EAL/D) in the state education system of Queensland, Australia. Historically from the 1970s, the provision of English language education through government schools across Australia has been paramount in settlement services for migrant and refugee-background students. As a product of multiculturalism, English language education has enabled immigrants of diverse linguistic and cultural backgrounds to develop the English skills and capacities needed to participate in the practices of the dominant, English speaking, Australian society (Lo Bianco 2016). 'Dialect' in the naming of the policy reflects the inclusion now of Aboriginal and Torres Strait Islander English dialects in such policies and more broadly in the Australian curriculum (Australian Curriculum, Assessment and Reporting Authority (ACARA) 2014, p.8).

The naming of the policy of English language teaching has changed over time, as have funding arrangements, and federal and state government involvement. The specific analytical focus of this paper is current EAL/D policy in the restructured Queensland state education bureaucracy, where the policy has been subsumed as part of a systemic meta-policy of inclusion. While there is extensive funding for the policy, responsibility for its delivery has been devolved to schools, which now have greater autonomy over one-line budgets and with very limited accountability measures in respect of the provision and outcomes of the EAL/D policy in practice. The analysis demonstrates that this framing and managing of EAL/D policy opens it up to market forces at school sites, where the private sector (e.g. edu-businesses) can potentially sell 'solutions' directly to schools. Verger, Fontdevila and Zancajo (2017) have described such a situation as privatisation and commercialisation enabled by structural reform. The analysis also confirms the policy insight that the structural location of a policy within the bureaucracy affects its enactment and impact (Offe, 1975) and the further insight that the meta-policy framing also dilutes systemic support and accountability for the implementation of EAL/D in schools. In a sense, EAL/D policy is 'everywhere and nowhere'. This reality potentially enables the involvement of private sector actors in schools in relation to their EAL/D work.

The structural layers of the education department which will be presented throughout the paper are summarised here. The Department of Education and Training (DET), as described by our participants, has a hierarchical structure, where 'central office' located in the state's capital city Brisbane has responsibility for policy and performance measurement. Beneath central office are seven regional offices located geographically across Queensland, and these exist to provide a link between central office and Queensland's 1,249 government schools (Queensland Government, Department of Education. 2021). The division of relevance to EAL/D is the 'Division of State Schools', which supports planning and operations within regions and schools to ensure students have access to 'quality learning opportunities' (State of Queensland Department of Education, 2020, p.8). There are six portfolios in this division: Disability and Inclusion; Indigenous Education; Operations; Performance; Rural, Remote and International; and Independent Public Schools. Our participants indicated that the provision of EAL/D support (like EAL/D policy) is located within each of these portfolios. For example, Indigenous Education has staffing dedicated to Indigenous EAL/D, while funding for Indigenous EAL/D programs is overseen by Operations. This conflation of interests across numerous portfolios might create conflict, struggle or confusion about the enactment of policy texts, particularly around 'things like commitment, understanding, capability, resources, practical limitations, cooperation and (importantly) intertextual compatibility' (Ball, 1993, p.13). The paper proceeds as follows. First, we outline the logics of policy privatisation to show how gradual, covert changes to policy, may open the door to commercialisation in schooling. Second, we provide context to the current policy position of EAL/D learners within the meta-policy of inclusion in Queensland government schools. We also document the recent history of EAL/D policy reform in Queensland, noting the progressive decentralisation of EAL/D support from the federal government in the 1990s, to individual, financially-autonomous schools today. Third, we note how Ball's (1993, 2015) conceptual work on 'policy texts' and 'policy effects' frames our analytical contribution. We then present our findings based on semi-structured interviews with five education policymakers and officers situated within Queensland's DET, and from analysis of policy documents. Our

interviews draw out the processes and effects of EAL/D policy transformation. Finally, we provide an analytical commentary exploring the contemporary 'state of policy' and how structural reforms have affected EAL/D enactment in schools through the logics of privatisation.

Logics of policy privatisation

The trend towards privatisation in education functions in both overt and covert ways. Much research, for example, has investigated the rise of private and for-profit provision of schooling (Martin & Dunlop, 2019; Verger et al., 2017); the increasing influence of public-private partnerships (Gericke, 2021), the enlarged roles of non-state actors (Menashy, 2016), edu-businesses (Ronnberg, 2017 Ball, 2018) and philanthropists (Olmedo, 2014; Tompkins-Stange, 2016; Powell, 2019); the enhanced use of 'outsourcing' or contracting of services to the private sector, including in specialised curriculum provision (Bates, Choi & Kim, 2019), school maintenance (Gerrard & Barron, 2018), school infrastructure (Wood, 2020) and school supplies (e.g. the running of school canteens/tuckshops) (Burch, 2009); and the emergence of a powerful shadow education/tutoring industry (Edwards Jr, Le & Sustarsic, 2019). Most of these examples of privatisation can be traced back to education policy reforms starting in the late 1980s seeking to drive systemic improvements in schooling through system restructuring, decentralisation and enhanced autonomy for individual schools (Le Grand, 2009). As Ball and Youdell (2009, p.80) observe, 'while the language of privatisation is not always overtly present in policy - instead the vocabulary of choice, improvement, quality, effectiveness and efficiency prevail - these policy "moves" and their concomitant techniques at the organisation level often result in privatisation and privatising effects'. Verger et al. (2017) have described this as privatisation via 'state structural reform', which while contextually different across nations, often involves reforms in the provision (e.g. Charter schools in the US, Academies in England and Free Schools in Sweden) and financing (e.g. 'one-line budgets') of schooling. These policies often promise greater control and responsibility for schools through devolving decision-making and budget control to principals (McGrath-Champ et al, 2019). As Hogan and Thompson (2021) demonstrate, often these logics of policy privatisation – especially enhanced autonomy and budget control – create opportunities for school-based commercialisation, where private providers will sell education 'solutions' (e.g. products and services) directly to government schools.

Hogan and Thompson (2021) have made a useful distinction between privatisation and commercialisation, which is applicable to the analysis proffered in this paper. They see privatisation as developing quasi-markets in school systems, achieved through policy and systemic restructuring and see privatisation as done to schools. Privatisation policies privilege parental choice of schools and more school autonomy. In contrast, they see commercialisation as 'the creation, marketing and sale of education goods and services for commercial gain' (p.5) and note this occurs in schools. The paper is concerned to demonstrate how bureaucratic restructuring and a new policy frame for EAL/D potentially opens opportunities for the commercialisation of EAL/D provision in schools.

In Queensland all government schools have autonomy and control their own budgets, in an extension of the Independent Public School (IPS) initiative, introduced in 2013 to create an

avenue for public schools to decentralise from the broader state system. Just as Gerrard and Savage (2021) have observed of IPS schools in Western Australia, there is little difference now between the autonomy afforded to decentralised (IPS) and centralised (non-IPS) schools: 'For instance, since the introduction of IPS, one of its signature policy items, 'one-line budgets', which grant principals the power to locally determine budget decisions, have since been rolled out to all public schools' (p.6). With the devolution of control to local principals, public schools have increasingly been placed in competition with each other - often with published school performance data fuelling logics of school choice (Hardy, 2014). Research has investigated how public schools now increasingly market themselves, and their unique characteristics to prospective 'clientele' (Fitzgerald et al., 2018), often 'partially' selecting students on the basis of academic, sporting or cultural merit (Rowe, 2020). Indeed, a common concern is that comprehensive public schools have become residualised and forced to cater to disadvantaged or complex student cohorts (Keddie & Holloway, 2020). Drawing on social justice principles, some research has investigated how this has led to the establishment of targeted programs of support within government schools – often through school-based allocations of resources – which for example, might cater for cultural and linguistic diversity (Keddie, 2017; Pugh, Every & Hattam 2012). However, despite schools supposedly being able to better respond to the needs of students at the local community level through these targeted programs, Keddie and Holloway (2020) argue that often these efforts to cater for diversity do not align with formal policies for equitable and inclusive provision. As an example, Carter and colleagues (2020) argue extra funding tends to be spent on teacher assistants in mainstream classrooms – often without these assistants having any formal or specific accommodations for students with special education needs. Similarly, Dally et al. (2019) suggest that generalist teachers often lack the skills, knowledge and attitudes required to implement effective inclusive education in mainstream classrooms.

Regardless of the tensions that exist around the politics of mainstream schooling, recent policy reforms in Queensland have doubled down on the importance of mainstreaming by indicating the need for *all* state schools to be able to cater for every student. Indeed, a recent review of education for students with a disability (broadly defined, as we explain below) conducted by Deloitte (2017) for the Queensland DET recommended that while 'regular schools are not currently universally suited to meeting the educational needs of all students with disability' that immediate shifts be made towards improvements in inclusive practices in all mainstream school settings.[i]

As we describe in the next section, the development of an inclusion policy, subsuming EAL/D policy, and the removal of centralised infrastructure to support particular groups of students in specialised schools or programs, has led to the decentralisation of EAL/D support. These specialised programs with expert staff have been removed in favour of distributing funding to individual schools to create their own 'solutions' to students' specialised learning needs. Our argument is that this devolved structure, with an onus on autonomous schools with no formal accountability mechanisms, potentially opens the space for the commercialisation of EAL/D services in Queensland government schools.

Inclusion policy in Queensland

The 2017 Deloitte review of disability in Queensland state schools argued that good policy for students with disability is good policy for all students. It unequivocally supported the inclusion of students with a disability through mainstream schooling processes, supporting curriculum adjustments, enhanced funding and specialist staffing. Further, it called for a 'culture change strategy' in relation to students with a disability and that all educators should be 'held accountable' for building an inclusive school environment (Deloitte, 2017, p.V). As previous research has highlighted, this review rejected the segregation of particular students, or groups of students into 'special schools' and/or separate education units (Slee, 2018), and spoke of the importance of including not only children with a disability, but students of all cultures, ethnicities, religious, linguistic and socioeconomic backgrounds. The DET implemented this review in the form of a strengthened Inclusive Education policy, that not only targeted students with disability, but all those situated within the broad ideals of inclusion, including those with EAL/D needs.

Fundamentally, the inclusion policy advocates that all students should be able to access and participate in a high quality education, in a safe and supportive environment, at their local state school (Queensland Government Department of Education, 2020). The document calls on schools to implement the policy through 'reasonable adjustments and teaching strategies to meet … individual needs' (Queensland Government Department of Education 2020, p.1). Antithetically, sections of the policy indicate that particular groups of students 'who meet set criteria' may still be offered enrolment in 'highly individualised programs, including through special schools and academies' (p.2). Moreover, several groups of students are listed for specific recognition of difference due to how they might experience 'different barriers to inclusion', including, for example, as noted in the policy (p.3), Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, students who identify as LGBTIQ, students from rural and remote communities, students with disability, gifted and talented students, and so on. Indeed, the policy states: 'the department will continue to implement strategies and policies, and support practices that address the unique needs' of each of these groups of students (p.3). In sum, this three-page policy document, argues for inclusive education for all students through reasonable adjustments, but also opens the door to 'segregated solutions' (Slee, 2018). Thus, while the inclusion policy is intended to benefit all students, the identification of target groups within the document suggests enactment is in relation to specific students and their unique needs.

Sitting underneath the inclusion policy is a two-page document that outlines the requirements for EAL/D students (Queensland Government Department of Education, 2018). This is only one of many documents providing advice on curriculum, assessment and reporting frameworks in Queensland state schools, but clearly fits within the inclusion portfolio. According to this document, EAL/D students may include students that belong to specific cultural groups (Aboriginal and Torres Strait Islander, Maori, Pacific Islander, South Sea Islander), or are immigrants, refugees, international students, or returned travellers. Deaf and hearing-impaired children who use Australian Sign Language (AUSLAN) are also included in the EAL/D group. This specific naming of particular 'groups' of students further highlights the tension evident in the meta-policy of inclusion. Further, this document provides specific guidance for schools on

identification of language learner needs and monitoring of progress in Standard Australian English, as well as models of curriculum delivery, and additional administrative expectations. For example, schools are required to identify students who are EAL/D within the state's administrative software system of student data known as 'OneSchool' and to measure and document their English language progress using Bandscales, a tool developed by the DET for this purpose. Importantly, there is no indication that enactment of these guidelines is linked to any accountability processes within schools or the department.

Policy text and policy effects

Policies are products of the micropolitics of legislative formation and interest group articulation (Ball, 1993), as well as the internal politics played out inside state bureaucracies (Offe, 1975). As Ball (1993) observes, this means that there is often ad hocery within state policy formulation processes, where ideological politics and agenda control change understandings and the constitution of 'problems' and thus the processes of policy influence and text production within the state. He argues that over time, policies are re-oriented and re-interpreted, opening spaces for new actions and responses. In that observation, he is referring to the ways policies over time are rearticulated within the state as a site of policy text production. Ball's point is that we cannot predict or assume how policies will be acted upon or enacted (see Ball, Maguire and Braun, 2012), what their immediate effects are, or what room for manoeuvre actors will find for themselves, but that it is important to understand that policies 'create circumstances in which the range of options available in deciding what to do are narrowed or changed' (ibid, p.12 [ii].) .) Indeed, in attempting to determine the 'effects' of a specific policy, Ball cautions us that multiple texts are in circulation at any given time, and 'the enactment of one may inhibit or contradict or influence the possibility of enactment of others' (ibid, p.13). Taken in this way, 'the effects of a specific policy may be limited but the general effects of ensembles of policies of different kinds may be different' (ibid, p.16). If we take note of Ball's claim that policy change causes both first and second order effects, we can start to understand first, how changes in practices and structure across a system, might then affect patterns of equity, access and social justice within the system. As summarised by Heimans, Singh and Glasswell (2017, p.186), 'enactment is never just about what happens in schools but includes the virulent mix of the generation and adoption of these ideas by and through government and bureaucracy'. Thus, in making sense of the 'state of policy' in Queensland government schools, our analytical contribution in this paper is to trace the 'discursive origins and possibilities of policy' (Ball, 1993, p.16) as understood by education policymakers and officers sitting within the DET's central office.

The Study

This study forms part of a larger international comparative project on the privatisation of English to Speakers of Other Languages (ESOL) in four government school systems (including Australia, Hong Kong, Japan and Greece). This broader project is investigating the material and structural conditions that enable and shape privatisation practices in the teaching of English.

Our focus on the state of policy in this paper follows our hypothesis that the restructuring of EAL/D policy within Queensland government schools has created the necessary conditions for EAL/D commercialisation, where the private sector can sell EAL/D 'solutions' direct to individual schools. The data we present in this paper corresponds to the first stage of the project, concerned with policy and the perspective of policy makers. Our research has been conducted with the approval of the Queensland State education department and with Institutional Human Research Ethics Approval granted through the University of Queensland (Approval Number 2019000033).

Interviews with five policy makers and officers were conducted in 2019. Participants were purposively selected on the basis of their roles within the department in relation to EAL/D, but given the need to protect anonymity, we only refer to our participants as CO1 through to CO5 in the reporting of results. CO here refers to Central Office. Each interview took approximately one hour and was conducted onsite within the DET's central office, recorded and then transcribed for analysis. To analyse the data, thematic codes were established via a deductive approach. Two researchers coded the five interviews independently, and then discussed codes to ensure agreement in the qualitative analysis. Drawing on our theoretical frame, emergent themes were grouped into two categories: 1) Policy text and 2) Policy effect. These broad categorisations allow us to explore the perceptions of policy makers and officers about the intentions of EAL/D policy reform and the potential effects of this policy text in practice.

Policy text

The policymakers and officers interviewed in this study perceived EAL/D policy as: 1) embedded within a meta-policy of inclusion; 2) supported by generous targeted funding; and 3) progressively decentralised from close departmental oversight to individual, autonomous schools. Each of these subthemes is discussed below to show how reframed policy along with systemic, structural changes across the Queensland government school system have started to shape the contemporary possibilities for EAL/D provision, specifically the likelihood of the involvement of private providers.

EAL/D within the metapolicy of inclusion

Participants understood that EAL/D guidance sat under curriculum policy, which, in turn, sat under the inclusion policy. As described by CO2, there is a hierarchy of documents, starting with the P-12 Curriculum, Assessment and Reporting framework which governs the delivery of curriculum across all Queensland government schools. Then,

> there are a range of supporting documents underneath that policy document, one of which is the whole school approach to supporting diverse learners and which is about differentiation-focused and intensive support, that sort of tiered model. Sitting underneath that document is the document … supporting EAL/D students, so just a two-page document basically.

As this policy maker explains, the policy document that specifically uses the nomenclature of EAL/D sits beneath 'policy layers' and is limited in its detail. CO4 noted that the lack of

specificity in the inclusion policy could be used as a 'friend' to leverage support for EAL/D students.

> The risk with EAL/D is that because some of the specific policy work and specific support work has disappeared, you need to find your new language for the department and that's it. So, if it's in the inclusion bits, you front up and you use the language of that document to say, "this is why these students' needs need to be met and these students' specific needs are" – and then it's a language kind of focus. So, EAL/D sits within inclusion, absolutely, no doubt about it. (CO4)

However, the potential to exploit the inclusion policy for EAL/D advocacy requires specialised EAL/D pedagogical knowledge and school management, which is described in only a very limited way in the EAL/D two-page policy document discussed above.

Indeed, other officers expressed discomfort in naming and positioning the various EAL/D groups within the inclusion policy space, particularly given that the policy arose out of Deloitte's external review into the department's management of disability. The problem, according to CO1,

> is that inclusive education - and we all push inclusive education, including us - statement has come out of the disability area. I personally feel very uncomfortable having Aboriginal and Torres Strait Islander and culturally and linguistically diverse [students] put with a disability portfolio. They will say this is an inclusive statement and so obviously students with a disability are only one arm and there's rural and remote ... [and] all sorts of other things. It's not that there's anything wrong with this statement. I think it's just where it comes out of that makes me feel uncomfortable.

CO2 similarly described that the Deloitte review had driven the departmental focus on disability, and that there was now a need to focus on the broader portfolio of inclusion, 'and that the next piece of work is to get our heads around the gifted and talented, the gender diversity, the LGBTIQ, and of course, the EAL/D learners.'[iii]

The opaqueness of EAL/D in the inclusion policy was also reflected in the uncertainty policy makers expressed when asked to quantify the EAL/D population. While all participants reported difficulties in identifying and counting exact EAL/D student numbers due to 'unreliable data' (CO2) – as per previous research on this phenomenon (cf. Angelo and Hudson 2018; Angelo and Carter 2015; Creagh et al. 2019; Creagh 2014) – there were consistent reports across interviewees that EAL/D students constitute approximately 20% of the total student population in the Queensland state system.

> It seems that in OneSchool, about 630,000 entries are flagged as either, parents speaking a language other than English, or students speaking a language other than English... 510,000 students are – have English as one of the languages spoken at home... Which is going to be 630 minus 510, so, it's going to be about 110,000 students who have English either as their second language or additional language, or having a language spoken other than English at home by one of the parents... So, it's a little bit muddy. (CO4)

There was also a sense that the numbers of EAL/D students were increasing, though this might be an indicator of developing processes for identification of specific learner groups. In particular, identification of Indigenous EAL/D[iv] had risen dramatically, but as explained by CO3, accuracy in numbers can be poor in Indigenous data.

> Ten thousand identified as Aboriginal or Torres Strait Islander. That number's gone up about 30 per cent. It was about 6000 a year or two ago, and then there was a big push to get more kids identified. I know a few hundred in there, particularly in the Southeast Region, are probably inaccurately identified, but I'd suspect that there's another 10,000 or so that are as yet unidentified. (CO3)

Apart from poor identification, longitudinal identification of EAL/D is also hampered by other administrative processes or limitations. Once identified as EAL/D, students maintain this status (CO2) but may not be counted as EAL/D if they have no Bandscale data recorded in OneSchool. Bandscales are a language proficiency tool created and used by the department to track the English language development of EAL/D students. Knowledge and use of the Bandscales has traditionally been within the remit of EAL/D specialists and the interviewees reported that most teachers 'have no idea' (CO5) how to use the tool and could not be expected to add this tool, 'a six level additional construct for language' (CO4) to their workload. However, the merits of a dedicated EAL/D proficiency tool, such as the Bandscales was flagged as useful and good for teachers, for 'identification work', and building 'teaching responses around it' (CO3). Appropriate use of the tool by classroom teachers would enable differentiation between beginner, middle and advanced language levels as 'levels of proficiency make a difference' (CO3). Some interviewees flagged that capability building in using the Bandscales would result in 'effective EAL/D responses' in the classroom.

EAL/D targeted funding

Funding models provide another source of policy guidance for the delivery of EAL/D services across Queensland state schools, and policy makers indicated that there was no shortage of funds to support EAL/D learners. As explained by CO4,

> Schools receive money in three different ways...so there are two notional allocation models, there's a staffing model allocation and there's what's known as the WSSLR money, which is the Whole School Support for Student Learning Resource. … Then we have some targeted and general grants. So, there are three streams of money … the department's position is that schools have plenty of money.

In particular, CO4 discussed how the 'targeted and general grants' direct considerable financial support to schools for EAL/D learners. These funds are made available through the Department of Education's 'Investing for Success' scheme, which 'the government gave $263 million to this year',

> Within that funding allocation, Indigenous students get $322 extra and English as an Additional Language/Dialect, they get $2467 for each EAL/D non-refugee student, and refugees get $6703 ... So, that's a chunk of money that goes directly to the school. (CO4)

While CO4 has referenced the funding for Aboriginal and Torres Strait Islander students here, CO3 clarifies that this funding is independent of EAL/D need.

> Aboriginal and Torres Strait Islander [students] get $300 regardless. There's nothing that says anything about EAL/D... So they get that $300, so everyone gets that. If you're particularly remote, you get another couple hundred dollars, and then if you're low SES, you get another couple hundred dollars… I think it works out to about $600 total, but that would be available across 12 years [of their schooling].

While schools receive funding based on their 'types' of students, there is limited accountability in terms of how this funding is spent. For example, schools receiving Investing for Success money must provide a signed one-page statement on their school websites describing how this grant would be used. Yet, as indicated by CO4 it was probable that departmental priorities would be highlighted and unlikely that EAL/D would be mentioned in these statements.

> I do not think that you will see EAL/D written there. I don't think you'll actually see those things phrased around the populations that that money is funding. I think you will see general descriptions of school improvement and maybe, maybe not, you might see stuff like, improve reading, hire a literacy coach, … schools in Queensland are really able – they have an enormous amount of freedom.

In combination, and at face value, the Inclusive Education Policy and targeted funding schemes would suggest that the institution of EAL/D within the department has policy 'everywhere'. However, as we discuss in the next section, another policy under the umbrella of inclusion has been introduced by the department to disperse EAL/D provision from the central bureaucracy to individual schools.

EAL/D decentralisation

The decentralisation of EAL/D provision has been made on the basis of public school catchment legislation that requires students to enrol in the 'local' government school which services the geographic area in which a student lives.

> The policy and procedures for enrolment state that schools have a catchment area. Anybody residing in that catchment area must attend that school, and if they come from outside that catchment area, they should go to the school that's in their catchment area, and that's quite clear… There is no circumstance in which it would be an option for a school to say yes, you live down the road from our school, but the school two suburbs over would cater better for your needs. So, with that procedure in mind, every school is starting to take on more and more [EAL/D] students. (CO2)

The previous centralised management of EAL/D services had meant that EAL/D students, particularly in the secondary school system, were provided a schooling pathway from intensive English through to English units within some mainstream schools, to finally, the mainstream classroom in a school near the student's home. This program provided a scaffolded transition of beginner EAL/D students into mainstream programs across the period of three to five years, sufficiently flexible to cater to each students' individual language and learning needs. Importantly, the centralised management of this program ensured a critical mass of students

moving through the program, thus supporting stable service and specialised EAL/D staffing for these school sites.

However, with the department enforcing enrolment within local catchment, this centrally managed pathway has ended for metropolitan EAL/D students who are now dispersed across multiple schools with varying experiences and knowledge of EAL/D. It is worth noting that students can often attend a public school of their choosing, if they have the requisite 'merit' – academic, sporting, cultural, wealth – to be granted special entry through an out of catchment enrolment (cf. Rowe & Lubienski, 2017). In the case of EAL/D, however, the requirement that all schools cater to their specific populations is intimately intertwined with the inclusion policy in which all schools are required to include all students. This has negatively impacted on specialist EAL/D teachers, who instead of being employed at one school, might now work across any number of schools.

> You'll hear them (EAL/D teachers) all saying, "oh, well, I used to be three days a week there. Now I'm half a day here and half a day there", which is pretty much worse than useless. You'd be better putting all that teacher expertise into training the teachers if that's the model you're going to go with. All the teachers need better support in being able to meet the needs of the EAL/D students and understand what the language demands are as opposed to the literacy demands. (CO5)

Similarly, there have been consequences for the allocation and use of EAL/D funding. As discussed above, funding for EAL/D is untied from EAL/D services.

> Basically they've untied EAL/D funding, because it's now part of the general budget allocation to school. We don't have transparent specific-purpose EAL/D resources… Basically provision of EAL/D has moved away from central office to regions and schools, especially to schools. (CO5)

Despite considerable provision of funding, decentralisation of EAL/D has dispersed the specialist knowledge of the field, and with limited accountability requirements and one-line budgeting in schools, EAL/D policy has been rendered 'nowhere'.

Policy effects

In this next section we explore how the education policy-makers think EAL/D as an institution is evolving through ad hoc enactment in autonomous schools. In particular, we focus on how the structural changes described above have produced effects on: 1) a school's autonomy for individual decision making in regard to EAL/D provision; 2) access to EAL/D support within schools – and the potential for more schools to 'outsource' provision to the private sector given the lack of specialised EAL/D expertise; and 3) how a lack of formal accountability structures has worked to confuse schools about their responsibilities for EAL/D provision – with many shifting responsibility to generalist classroom teachers without provision of sufficient training or support. We document these subthemes below to detail the 'second order' effects (Ball, 1993) that have arisen from the meta-policy of inclusion, paying particular attention to issues of access and equity for EAL/D students.

School autonomy

Given increasing autonomy in Queensland public schools, particularly since the creation of IPS in 2013, principals have become 'really powerful' and regardless of centralised policy or advice there is rarely requirement for 'hard compliance [to DET policies] at the school level' (CO4). Rather, the enactment, in this case of EAL/D support is 'at the school's discretion' (CO1). This was viewed as a consequence of changed funding models where schools have full 'autonomy around what they do with that money' and 'how they interpret the Inclusive Education Policy' (CO2). There was a sense of frustration amongst some interviewees that the 'weak line management' (CO4) of principals by Assistant Regional Directors (ARDs)[v] was accentuating a fragmented approach to EAL/D enactment in schools. Officers referenced that some ARDs lacked sufficient 'influence as principals' bosses to ask questions about EAL/D' support structures in schools, despite the fact that ARDs had been instructed to treat EAL/D as 'a priority right now' (CO3).

Indeed, CO2 commented that 'central office support basically stops at the policy document and a couple of resources' and it was really up to regions to work more productively with schools. This perception of the central office as a mere producer of policy texts (and provider of funding) in the restructured bureaucracy was expressed in a number of interviews and is supported by our analysis of them. As CO3 observed, given the structure of the Queensland education system, the seven regional directors 'have more influence directly on the schools and principals in their region than probably us in the central office'. The problem with this, according to CO3, is that while regional advice and support are 'potentially a good thing', 'right now, it's completely ad hoc'. Similarly, CO4 argued that while their job in central office 'was around the mobilisation of knowledge and supporting practitioners' it is 'within a climate where we have no real authority because of a regional model, and empowered autonomous principals'.

As summarised by CO5, 'basically provision of EAL/D has moved away from central office to regions and schools', where for example, some regions invest in 'literacy' coaches over dedicated EAL/D positions (CO5). While CO3 suggests that each region is meant to respond to their localised cluster of schools, there are a range of competing interests and priorities that often mean EAL/D support is pushed aside.

Even with these regional support structures, CO2 observed that it is still up to schools to 'invite those regional coaches in, or not'. Indeed, CO2 argued that the autonomy afforded to schools - and their decision-making about their local priorities - can often hamper the progress of priorities set by the state. However, as CO3 argued, despite a push from central and regional offices to focus on EAL/D, and inclusive education more broadly, there was a gap for schools in understanding what they should be doing to actually support EAL/D learners,

> So we've gone through this process where it was very well promoted, but we lost a lot of capacity inside the department to do the work in a meaningful way. So there's been a lot of awareness raising and a lot of advertising for two or three years, and a lot of schools know that they should be doing something about it. But … there's been this feeling of people not knowing what they should do about it, so actually not having clear answers around essentially what whole class pedagogies are effective for EAL/D

learners, like what can you do after we've made a big deal out of it? So it's a gap and we're trying to fill it.

Expertise for EAL/D provision

Policy-makers noted that while schools do not lack funding to address student needs, there are issues around finding appropriate expertise,

> There should never be the argument that we can't do anything for this child because we didn't get funding for them. They have the autonomy to make the decisions at the school level to provide funding for that child. So, where an EAL/D student requires intensive support, then that should - a school should be able to provide that. Whether or not they can find somebody with the expertise to do that is another question…. so, some high schools, for example, are filling positions with early childhood teachers in the belief that they know something about teaching oral language and teaching reading and whatever, so therefore they would be best placed to teach EAL/D students. (CO2)

This creates an environment where 'schools are free to go on their own adventure' (CO5). What this 'adventure' looks like according to CO3 depends on the principal, their prior experiences of offering EAL/D support and 'what they think will support their students the best'. The danger of this approach is that if you do not know what 'a good EAL/D program or app looks like' then Google can send you down a whole lot of different paths about 'teaching English as a second language' (CO3). This tends to eventuate in many schools buying commercial services for EAL/D students,

> We're going to buy this package. We're going to do this reading thing. Yeah. There's not much having to report back to anyone. It all comes down to did the data shift? If the data shifts, everybody's happy. If it doesn't, the school thinks, mm, that was a waste of $10,000. We'd better do something else. (CO5)

Others were also concerned about the pedagogical approach of supporting EAL/D learners with commercially purchased apps,

> If you're in an early childhood setting, you shouldn't be in a single person withdrawal in the corner trying to work your way through a video game. That's just absolutely completely terrible pedagogy. It's not what all the early year people say. Is that what you'd say for teaching as a second language? One kid on a screen? It's absolutely not appropriate. (CO3)

This same bureaucrat argued, given the lack of centralised evaluation services, it was difficult for schools to know what to do. They suggested that 'there are some decent people in the department who know about the teaching of reading' and 'there should be nothing that stops them from doing a critical analysis of every single [commercial program] and saying, this one will give you this, this and this. This one's no good, whatever, have some recommendations. But they're too risk-adverse to engage in the project'. This bureaucrat thus acknowledged that schools were purchasing commercial products to use with EAL/D students as an effect of the restructured bureaucracy and school autonomy, and that there was no central evaluation of the quality of the available products.

13

Lack of accountability and capacity for EAL/D provision

Generally, the policy-makers perceived there was a lack of accountability on how principals spent their targeted funding for EAL/D support. One bureaucrat made the point that principals were not using the targeted funding for the purposes for which it was intended, but for what were perceived to be the school's own priorities (CO5). For example,

> So, while they may receive funding per EAL/D student, and particularly if they're receiving particular allocations for those students, the funding say for refugee students is - ostensibly it's to recruit EAL/D teachers. But if a school decides that instead of doing that, they're going to put on an additional deputy principal, their argument may well be that they're going to do that because of the complex nature that they need to have somebody in a leadership role connecting with parents, organising homework groups, arguing with the counsellor about transport, connecting with health about supporting their understanding of nutrition, whatever. That's all well intentioned, but that doesn't mean that the children then get the small group language instruction that they need. (CO2)

CO3 summarised that,

> Partly what's been going on, so those kids that never got that support in a lot of schools continue not to get that support even at the exact time that we were saying that we were funding it and targeting it. (CO3)

Beyond the structure of the school, and how leadership positioned EAL/D support, there was a common theme amongst the interviewees that the generalist teacher had to be made more responsible for delivering EAL/D support. There was a broad acceptance that, while some schools would employ specialist EAL/D teachers, most needed to upskill their staff in delivery of EAL/D support,

> More than anything else is the quality of the teacher that they see day-to-day, not the ESL/EAL/D specialist teacher that lobs in and out, because there isn't a lot - my understanding of the system is there isn't a great amount of those now and even if there are, the amount of kids that they have to see, seeing a specialist for 30 minutes a week, that role really needs to be working with building the classroom teacher capability… If they understand second language acquisition a bit and they understand the pedagogy that's effective for EAL/D, they're enacting it every single day and you can move mountains with kids very fast. (CO1)

There was a particular concern that secondary school teachers lacked sufficient understanding about the needs of EAL/D students. CO5 for instance, said, 'I've had [high school] teachers say to me, if their English is not good enough, they shouldn't be in my subject'. Yet, all officers agreed that the Australian curriculum provided 'tremendous freedom' for teachers to modify tasks in ways they enact the curriculum and 'bring in EAL/D pedagogy' (CO1). The problem though, according to a number of participants, was that Queensland teachers lean too heavily on the 'Curriculum into the Classroom' (C2C) resources.[vi] While C2C resources were designed by the state department as a starting point for school curriculum planning, that should be adopted or adapted to meet individual student learning needs and local school contexts, they

are often implemented as is. CO3 for example, discussed the need to 'take bits and pieces out of the C2C to help you' but, to also 'make sure you're differentiating through the unit and factoring in EAL/D'. Similarly, CO1 argued,

> If it's - some bulk standard C2C units in all the learning areas, if I enact that in 100 per cent Indigenous community, it's going to be quite meaningless to the kids. So you would have to look at, well, what's the - go back to the Australian curriculum, go - look at the unit. What's - what are they really trying to achieve in the achievement standard? (CO1)

Indeed, CO2 noted that 'there's still a lot of work that teachers need to do' both in their deep understanding of the Australian curriculum, but also in the development of their language skills. As CO1 noted, the department is 'madly trying to support things, but as a whole system, we're not there yet'. Indeed, some participants referred to the EAL/D Hub - an online professional development course for teachers - and how this works to build teacher knowledge and skills against the Australian Professional Standards for Teaching. As explained by CO3, there is a perception that beginning teachers have a fundamental understanding about EAL/D, and the Hub is about taking teachers from a graduate to more proficient level. However, as they observe,

> I'm not convinced that it actually does that job... I'm just not sold that it can as an online course take people to a proficient level where you would expect the capacity to actually do something moderately independently in a classroom and to change your practice to that level.

Others also made the point that graduating teachers do not even have a base of EAL/D training, and that initial teacher education providers should give more attention to EAL/D enactment (CO2). As CO1 summarised, the right kind of EAL/D support is very limited for generalist teachers, and it all depends 'on asking the right person at the right time of year'.

Discussion and Conclusion

Significant education policy reform in the Queensland government school system over the preceding decade has impacted the provision of EAL/D in subtle and cumulative ways. We argue this has primarily occurred through the progressive decentralisation of EAL/D support. For example, funding of EAL/D (formerly English as a Second language (ESL)), was once the responsibility of the federal government, before being devolved to states and territories to manage from the late 1990s (Oliver, Rochecouste, and Nguyen, 2017). The further devolution of (targeted) funding directly to schools and principals, for use in response to local EAL/D learner needs, has interrupted the need for centralised education services, placing more responsibility on schools to cater to their own contexts. Thus, rather than a critical mass of EAL/D students in a small number of schools with a centrally managed EAL/D program, there is now a dispersal of EAL/D learners across schools throughout Queensland.

Further complicating the structure of EAL/D at both a school and departmental level is the lack of confidence that the current system works to identify all EAL/D students. Despite the requirement for individual schools to identify EAL/D students, the department is unable to provide disaggregation of EAL/D student numbers. This creates a series of 'flow on' effects, where for example, flawed processes of categorising EAL/D learners in standardised testing in Australia have rendered invisible the impact of English language level on test outcomes and have contributed to the conflation of language with mainstream English literacy (Creagh 2014). The effect of this in schools is that there appears to be confusion about what EAL/D provision looks like. Indeed, schools are left to deal with this complexity on their own terms. They are faced with an inclusion policy that advocates – at face or 'political' value – for mainstreaming, but also an EAL/D document and EAL/D funding that suggests the need for specialised EAL/D provision. This devolution down the bureaucratic hierarchy has dispersed understanding of EAL/D, and as our findings suggest, it has become coupled, confused and conflated with disability, Indigenous language needs, literacy and reading. Understanding bureaucratic structure and its slow conversion of existing policies to new purposes, exhaustion due to systemic incompatibility (e.g. EAL/D, IEAL/D, literacy, reading and Disability and Inclusion), and erosion of resources (for these individual matters) have significant implications for understanding the structure of EAL/D policy and the possibilities for effective implementation.

As perceived by our participants, enhanced autonomy, coupled with weak accountability, has created a set of structural conditions that position schools to make their own decisions about EAL/D provision. This includes both the shifting of EAL/D expertise away from specialised teachers to classroom generalists, and consequently, the enhanced possibility of outsourcing EAL/D provision to the private sector, particularly through English language learning software and apps – which are not necessarily providing the structured EAL/D support students need, or are entitled to, through targeted funding mechanisms. To return to Ball's (1993) point here about the potential contradiction of multiple policy texts in circulation, we see the meta-policy of inclusion working to both mainstream EAL/D students based on equity, but simultaneously working to disadvantage EAL/D students in their opportunities to access centrally supported, high-quality EAL/D support. To be clear, we are not advocating against mainstreaming, rather we are arguing that the political appetite for mainstreaming needs to be supported by robust policy that clearly outlines – rather than confuses – the individual responsibilities of autonomous schools to provide reasonable adjustments to student learning, here for EAL/D students.

Our argument here aligns with older state theory (e.g., Offe, 1975, 1996), that the actual organisational structure of bureaucracy has impacts on the nature of policy that is produced and on its effects. This works in several ways. The configuration of a state department itself has effects on the policy developed; thus, for example, education located in a department of labour would work very differently in respect of policy from a structure in which, say, education is situated in a department of cultural concerns. This effect of organisational/bureaucratic structure works at more micro-organisational levels as well. We would argue in respect of our focus in this paper that the co-location of EAL/D policy with a broad systemic policy of inclusion, combined with devolution to school sites, has real effects on the policy developed and on what actually happens on the ground with the policy in practice. Our analysis above confirms these

observations. The meta-policy framing of inclusion in subsuming EAL/D confirms two policy insights: wording has effects and structural location in the bureaucracy also has policy effects. EAL/D service, if intended as an enactment of inclusion is illogically undermined by the generality of inclusion, and so has in fact become a form of exclusion. Centralised bureaucracy has established the principles of inclusion, but for schools, autonomy allows freedom to determine how inclusion is interpreted and actioned, if at all.

The state of policy, therefore, rests on both text and effect. The more recent policy literature tends to talk of policy enactment rather than implementation to emphasise some agency in the policy cycle at school and classroom levels (Ball et al., 2012). This agency can include ignoring the policy as well as implementing it. Our second policy insight thus relates to what happens now in the enactment of EAL/D policy at school sites, given these structural arrangements for EAL/D, combined with arguments about school autonomy, IPS etc, namely, schools are not held to account for what they do and there is the potential for them, with one-line budgets, to buy in commercial services to meet EAL/D student needs. In doing so, there is a perception amongst stakeholders that EAL/D policy is 'everywhere and nowhere'. On the surface, reducing central oversight and diverting funding based on need, allows schools more autonomy to respond to individual student requirements. This seems like a favourable outcome. But actually, this creates particular challenges - or vulnerabilities - in how policy is taken up and enacted. As the recent history of EAL/D in Queensland shows, there is now more responsibility on individual schools and teachers to exercise their judgement to determine who gets what, when and how. Previously, the state supported more systemic (and more expensive) 'solutions' to EAL/D support; for example, the funnelling of migrant students into particular schools and learning pathways with a concentration of expertise. As our analysis shows, this has been replaced by a loose accountability framework, and the potential opening of EAL/D to market forces and commercial providers, given attention now needs to be given to the local production and provision of required services.

We understand there is never a smooth and linear implementation or enactment of policy. However, what we have presented in this paper suggests a shift in policy over time, as EAL/D has moved from a centralised responsibility out into schools, already operating autonomously, with localised budget management. We have described the first order effects of this shift and wonder further about the second order consequences in education sites where there has been an increasing turn toward commercialisation. We argue that the mainstreaming of policies like EAL/D and the restructuring of roles and responsibilities within the department open up a potential commercial space for EAL/D provision, and indeed this commercial space already exists globally, through the immense TESOL industry (cf. Shin, 2016). We would argue however, that this commercial space sits outside the key concerns of government education: 'public ownership, equity and public purpose' (Darling-Hammond and Montgomery, 2008, cited in Wilkinson, Niesche and Eacott, 2019). If commercialisation of the EAL/D space is the next step, it is likely that the ideal of inclusive education in the government system will remain an ideal only.

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[i] We note how the use of private consultancy firms such as Deloittes to conduct such reviews is also common in restructured schooling systems.

[ii] Ball (2015), in a development beyond his 1993 paper, has made a useful distinction between policy as discourse and policy as text. In this paper, we confine our analysis to policy as text, neglecting policy as discourse, a neglect common in most policy analysis, Ball (2015) suggests. Ball, Maguire and Braun (2012) speak of policy enactment, rather than simply policy effects. This construction is to allow for some agency to those implementing policy, but in a circumscribed way, given their subject positioning by the policy discourse. Policy effects seems more appropriate to the analysis provided in this paper, as we are focused on the effects of department restructuring and reframed EAL/D policy. The next stage of the research will be conducted at school sites. Here the concept of policy enactment will have more salience.

[iii] At the time of finalizing this article, two positions for EAL/D officers in the inclusion portfolio of Central Office, had been advertised.

[iv] The Inclusion policy speaks of Aboriginal and Torres Strait Islander students. Indigenous is common usage today to include both groups.

[v] In the department's three-tiered structure, central office, regional offices and schools, regional directors (RDs) oversee whole regions, and school principals are managed by assistant regional directors (ARDs).

[vi] Curriculum into the Classroom (C2C) was a Queensland Department initiative to develop teaching units to support Queensland teachers implement the Australian curriculum introduced from 2010.