



Australian Government
Department of Education and Training

Proposed Revisions to the English Language Intensive Courses for Overseas Students (ELICOS) Standards

Record of response to public submission round

Australian Council for Private Education and Training

Preliminary

Are you happy for your submission to be published online? *

Yes

Organisation Name

Please provide your organisation name (if applicable).

Australian Council for Private Education and Training

Sector of Delivery

Please provide your main sector of delivery (ELICOS, VET, higher education, combination, other) (if applicable).

ACPET members deliver in higher education, vocational education, English language and schools sectors.

Are you a member of an industry body?

ACPET is a peak body for private education and training members

Implementation of the ELICOS standards

There will be a staged approach to implementation of the revised ELICOS Standards. The revised ELICOS Standards will be applied to new market entrants from 1 January 2018, and to existing providers from 1 July 2018, to allow providers time to make required changes to staffing, curriculum and delivery.

Response

ACPET seeks clarification on whether an almost 12-month implementation period is necessary. What would the impact of a start date of 1 January 2018 be for all providers?

Introduction

Clarifies that the definition of ELICOS Standards applies to all courses provided to overseas students that are solely or predominantly of English language instruction.

Response

Supported.

Standard C1 – Mandatory requirements for course applications

Clarifies the requirements for course applications, that information must be 'fit for purpose' and clarifies the strategy for assessing achievement of learner outcomes, samples of certification of completion and partial completion, and course syllabus.

Course applications must also demonstrate that the course will include 20 hours of face-to-face tuition per week.

Response

Supported.

ACPET presumes this proposal is intended to require attendance.

ACPET seeks clarification on whether video conferencing or other similar technologies that facilitate distance learning using visual contact will be considered to be face to face tuition.

Is a clearer statement of what will constitute face to face tuition needed?

Standard P1 – Scheduled course contact hours

Includes a direct reference to an ELICOS course being 20 hours of face-to-face tuition per week.

Response

Supported.

ACPET presumes this proposal is intended to require attendance.

ACPET seeks clarification on whether video conferencing or other similar technologies that facilitate distance learning using visual contact will be considered as face to face tuition.

Is a clearer statement of what will constitute face to face tuition needed?

Standard P2 – Needs of younger ELICOS students

Includes minimum requirements regarding the needs of students aged under 18 years, and that providers would need to structure courses for students of different levels of age, maturity and English language proficiency.

Response

Supported.

Standard P3 – Teaching ELICOS

The requirement for records of teaching delivery to ensure efficient administration has been replaced with the requirement for retention and accessibility of records.

Response

Supported.

Standard P4 – Assessment of ELICOS students

Includes requirement that assessment be valid, reliable, fair, flexible and clearly referenced to criteria; that there be appropriate oversight or moderation; that assessment outcomes in English for Academic Purposes courses are to be benchmarked against external reference points commonly used in admission criteria for tertiary courses.

The requirement for records of assessment to ensure efficient administration has been replaced with the requirement for retention and accessibility of records.

Response

ACPET seeks greater detail on the expectation around benchmarking. While benchmarking is supported in principle, the practical impact needs clarification.

For example, there would be a cost burden for providers if externally validated benchmarking was required to demonstrate compliance.

The requirement for retention and accessibility of records is supported.

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

Although there are no proposed changes to Standard 6 ELICOS Specialist Staff, a suggestion has been made to allow teachers in their final year of study, with an appropriate formal mentoring program, to be eligible. This may align with some State and private school registration requirements, providing greater consistency.

Standard P7 – ELICOS premises

Specifies that rooms and equipment should be fit for purpose and proportionate or appropriate to the number of students and course syllabus.

Response

Supported.

Standard P8 – Business management

The term 'designated authority' has been updated to reflect the new role of the 'ESOS agency' and/or designated state/territory authority.

Response

Supported.

Glossary

Outdated provisions have been revised or removed where appropriate.

Response

Supported.

Other comments

Please provide any other comments on the revised ELICOS Standards in the space below.

Response

Thank you for the opportunity to submit our views.