



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

Preliminary

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

Yes

Organisation Name

Please provide your organisation name (if applicable).

Sector of Delivery

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

VET

Are you a member of an industry body?

No

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

Six months from implementation to full changeover is insufficient given the hundreds of pending COEs for VET English courses which will be required to be cancelled and (hopefully) re-issued under ELICOS. A two year time frame would be far more appropriate.

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

In mid-2014 the then ASQA Chief Commissioner Mr. Robinson announced the reversal to the earlier decision to require VET English to be considered under ELICOS. From memory he stated that ASQA recognised that English Language teaching might take many forms, and that ELICOS was not the ONLY form. ELICOS is distinct in that it is "Intensive" training, and as such the requirement to have 20 hours of face to face classes per week is a requirement. In the existing Standards, ELICOS definitions contain that "Intensive" requirement. Under the new Standards, non intensive courses such as VET are required to become intensive in nature, this denying the thousands upon thousands of students who wish to study English under NON Intensive conditions, and under a VET framework. It appears that the strong ELICOS providers body have been successful in convincing those not in the industry that VET English is somehow inferior in quality (while no such evidence exists) and ruining the reputation of Australia's Language Teaching Industry. These unsubstantiated claims mask the real reasons for their lobby. For years overseas students have been attracted in increasing numbers to VET English, because the ELICOS providers have been delivering a poor quality service at exorbitant prices. VET English provider often have a superior

Response

product, better teachers, and deliver their courses at a fraction of the price. The ELICOS providers, through their mouth piece bodies such as NEAS and English Australia, as well as ACPET, have been trying for years to shut down the popular better priced courses associated with VET English. It appears they have succeeded in these new Standards. When these bodies ever produce any evidence that ELICOS providers and courses are in any way superior to VET English, that is when the Standards ought to change. There appears to be little change in the Standards except the definition of what is ELICOS. It will be a pity to see international students have their choices taken away, and to see the popular VET English courses morph into the lower quality unpopular and expensive rubbish courses offered by many ELICOS providers.

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

VET English has always been way ahead of ELICOS English in this department, so it is good to see some requirements of ELICOS to do what VET English has been doing for many years. What a pity the ELICOS providers were not made to live up to the same standards of VET English all along.

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

Course applications must be 20 hours face to face. This requirement takes English Language training back 15 years to the days when ELICOS providers shamelessly grew fat off the back of overcharging international students. Students will no longer have a choice to study 15 hours and 5 hours at home (as in VET courses), regulated by progress monitoring (like adults) but will be treated like children, against the hours they attend. If current ELICOS programs are of such high quality, why do they need to be monitored in this way? Is it because the students do not like attending the courses? So instead of recognising that different approaches work with different students, as Commissioner Robinson did in 2014, we are completely ignoring the decisions made at that time, now he has gone?

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

Why do ELICOS Standards need to repeat National Code requirements?
Aren't all ELICOS providers required to follow the National Code? Shouldn't ELICOS Standards be restricted to additional requirements?

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

Why do ELICOS Standards need to repeat National Code and CRICOS registration requirements? For ASQA registered RTOs there should be exemption for having to demonstrate yet again something that was previously addressed. In the case of a CRICOS registered RTO wanting to deliver eLICOS, it appears that some requirements appear 3 times, and that the provider would need to pass the requirement each time? Is this "Red Tape" gone mad?

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

Why do ELICOS Standards need to repeat RTO Standards? For ASQA registered RTOs there should be exemption for having to demonstrate yet again something that was previously addressed. In the case of a CRICOS registered RTO wanting to deliver ELICOS, it appears that some requirements appear 3 times, and that the provider would need to pass the requirement each time? Is this "Red Tape" gone mad?

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

No proposed response to this standard except again, Why do ELICOS Standards need to repeat RTO Standards? For ASQA registered RTOs there should be exemption for having to demonstrate yet again something that was previously addressed.

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

Why do ELICOS Standards need to repeat RTO Standards? For ASQA registered RTOs there should be exemption for having to demonstrate yet again something that was previously addressed. Staffing is addressed at RTO, CRICOS and now ELICOS level for essentially the same thing.

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

Why do ELICOS Standards need to repeat RTO Standards? For ASQA registered RTOs there should be exemption for having to demonstrate yet again something that was previously addressed. Premises matters are addressed at RTO, CRICOS and now ELICOS level for essentially the same thing.

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

Why do ELICOS Standards need to repeat RTO Standards? For ASQA registered RTOs there should be exemption for having to demonstrate yet again something that was previously addressed. Management matters are addressed at RTO, CRICOS and now ELICOS level for essentially the same thing.

Glossary

Outdated provisions have been revised or removed where appropriate.

Response

Other comments

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

Response

Why does ELICOS need its own Standards? Why doesn't Business Training have its own set too? What is covered under ELICOS that isn't already covered under requirements for being an RTO, or under CRICOS registration requirements? If nothing, then providers should have to comply with EITHER RTO standards, or ELICOS Standards (if they are not an RTO), not BOTH. The triplication of Standards and requirements is Red Tape is the extreme. ELICOS providers might have some legitimate reasons for wanting to set standards on their own group of non RTOs, but CRICOS registered RTOs should be exempted from this RedTape extravaganza. Finally, has anyone bothered to consult and review the most important stake-holders of all, the students? If that was done, I'm suggesting that the findings would support a verdict that VET English is more popular, better priced, reaches a different group, and has better outcomes than most ELICOS programs. Client choice and satisfaction has been ignored it seems, and only the unsubstantiated scare-mongering of the powerful ELICOS sector considered. Greed appears to win again.