



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).

ELICOS

Are you a member of an industry body?

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

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

An excellent proposal. It will stop the abuse of VET EAL courses being marketed to overseas students on the premise that students will not have to attend classes. RTOs who implement the DEEWR-DIAC Course Progress Policy and Procedures for its vocational education and training (VET) courses are not required for ESOS purposes to monitor attendance for those courses. Providers of EAL courses have abused this. Students brought to Australia to study EAL are told they do not have to attend classes. It is unfair to ELICOS providers.

To include EAL courses under ELICOS standards making attendance mandatory will improve EAL course quality and make it an even playing field.

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

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

Also, set MAXIMUM CAPS on daily face to face classroom time. Providers abuse the system and schedule students into 10 hours of daily EAL/ELICOS classes without breaks. This is very poor education and exhausting for students.

A daily limit of 5 hours per day plus breaks (delivered over 4 days) should be the minimum to ensure that students are not churned in and out of classes like on a factory line.

Course quality is severely compromised because there are NO reasonable limits on how long a ELICOS/EAL students are forced to study in a day.

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

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

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

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

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

There is a need for the standards to be more specific about:

P7.3 f) offices for the management of the ELICOS provider and for the confidential counselling of students.

What does 'confidential' mean? Providers abuse this standard by not providing managers with a private office for counselling. Instead managers are told to use boardrooms and other shared spaces. As the but boardrooms are often used by other staff, the ELICOS manager has nowhere to counsel and meet students or ELICOS teachers confidentially. Hence, the standards need to stipulate that a permanent private office must be made available for the exclusive use of the ELICOS academic manager.

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

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