



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

### Anonymous

## Preliminary

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

Yes

### Organisation Name

Please provide your organisation name (if applicable).

Not for Publication due to possible fallout

### 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?**

Not a useful one

## 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

**It would seem that there has been no thought given to the thousands of VET English students who are enrolled in VET english courses from 1 July 2018 - 1 July 2020. These students already have VISAS and COEs for these courses, and in many cases have paid for them. THESE courses CANNOT simply become ELICOS as the courses were based on VET, which had 15 hours per week contact, 5 hours home study, and were priced and paid for on those conditions, and the Award SALARY conditions according to VET delivery, not ELICOS delivery. So, any provider with these courses cannot simply MAKE them ELICOS. THEY would need to be taught out. Otherwise how would a provider be able to deliver VET english designated courses, at that price and under a Written Agreement associated with those conditions, with VET staff, under ELICOS Standards without losing tens of thousands of dollars? NOt even sure it would be legal. The same condition ought to apply when a VET course is being phased out. A year's warning is given, and after that no more students can commence the course, but those doing it can be taught out. Otherwise students are going to have to change course mid-stream in some cases, or just before the start in others, and suddenly be slugged with expensive ELICOS Course Fees. THE minimum in fairness to students, and providers is to have the timeframe for existing providers as follows. From 1 July 2018 no more students can be enrolled in VET English. Students previously enrolled before that date, and starting before 1 July 2019 can proceed with their course. All students must have completed studies by 1 July 2020.**

## 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

The definition appears to have changed in only one point, the removal of ELICOS being "Intensive". "Non-intensive" VET English now fits the definition of "Intensive" English, and an alternative affordable option for budget conscious students has been removed. Despite the definition being changed, the attendance requirement has not, meaning hours of attendance at a face to face class is considered a "Standard" or indicator of quality. How is this a indicator of quality, and how does this fit in with access and equity requirements? What evidence has ever been presented that 20 hours per week contact is the best way of learning English and is superior to 15 hours contact plus 5 hours independent learning, or is better suited to EVERY student? Wasn't the attendance requirement really more about students not attending ELICOS? If so, just how good are the ELICOS courses if students are forced to attend? Why is ELICOS considered superior to VET English when VET English students attend because they enjoy the lessons, whereas ELICOS students attend out of fear. Given the choice, it appears they wouldn't attend ELICOS at all.

## 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

As stated in previous section, How is a requirement to attend 20 hours face to face lessons an indicator of quality, and how does this fit in with access and equity requirements? What evidence has ever been presented that 20 hours per week contact is the best way of learning English and is superior to 15 hours contact plus 5 hours independent learning, or is better suited to EVERY student? Wasn't the VISA attendance requirement put in place because students were not attending ELICOS classes? If so, just how good are the ELICOS courses if students are forced to attend? Why is ELICOS considered superior to VET English when VET English students attend because they enjoy the lessons, whereas ELICOS students attend out of fear. Given the choice, it appears from comments we receive that they wouldn't attend ELICOS at all if they had the choice, given the poor quality of many current ELICOS providers' lessons.

## 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

As stated in previous section, How is a requirement to attend 20 hours face to face lessons an indicator of quality, and how does this fit in with access and equity requirements? What evidence has ever been presented that 20 hours per week contact is the best way of learning English and is superior to 15 hours contact plus 5 hours independent learning, or is better suited to

#### Response

EVERY student? Wasn't the VISA attendance requirement put in place because students were not attending ELICOS classes? If so, just how good are the ELICOS courses if students are forced to attend? Why is ELICOS considered superior to VET English when VET English students attend because they enjoy the lessons, whereas ELICOS students attend out of fear. Given the choice, it appears from comments we receive that they wouldn't attend ELICOS at all if they had the choice, given the poor quality of many current ELICOS providers' lessons.

### 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

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

### 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

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

### 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

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

### Standard P5 – ELICOS educational resources

No proposed changes to this standard.

#### Response

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

## Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

### Response

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

## 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

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

## 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

The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around this point is red tape gone mad. RTO / CRICOS providers of VET English already meet these standards TWICE under the existing framework.

## Glossary

Outdated provisions have been revised or removed where appropriate.

### Response

No Comment.

## Other comments

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

### Response

1. VET English students, the most affected stakeholders, have not been consulted, or surveyed about any effects this might have on them, or about any issues of quality, or course satisfaction. To force change on the thousands of these students who have not even begun their courses is unfair, especially in such a short lead in time (6 months). If the stakeholder students think VET English is superior product to ELICOS, will ELICOS be required to follow our standards?
2. VET English providers, the second most affected stakeholders, were not consulted. Consulting ACPET, which is dominated by ELICOS personnel, is NOT consulting VET providers. Why weren't VET providers specifically requested to comment before now, or before the Draft was made? I'll bet EA was ...
3. There is no evidence that VET English is in any way of lesser quality, or not delivered to the same standards as ELICOS. RTO Standards, CRICOS Standards, and the industry itself ensures that

## Response

VET English is every bit as good, if not better than most ELICOS offerings. Those who seek to claim otherwise have a vested and self serving interest.

4. The triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and even CRICOS Standards around quality, resources, staff and the like is red tape gone mad. The new standards are perhaps good if they were used to improve (non RTO) ELICOS providers' standards. RTO providers of VET English already meet these standards except compulsory attendance under the existing framework.

5. The changes in the standards appear to be made only with the aim of bringing VET English under ELICOS. The only changes at the actual interface between trainers and students appears to be a requirement for students to sit in a classroom for 20 hours per week face to face or risk losing their Visa. How is this a indicator of quality, and how does this fit in with access and equity requirements? What evidence has ever been presented that 20 hours per week contact is the best way of learning English and is superior to 15 hours contact plus 5 hours independent learning, or is better suited to EVERY student? Wasn't the attendance requirement really more about students not attending ELICOS? If so, just how good are the ELICOS courses if students are forced to attend? Why is ELICOS considered superior to VET English when VET English students attend because they enjoy the lessons, whereas ELICOS students attend out of fear. Given the choice, it appears they wouldn't attend ELICOS at all.

6. Why are we trying to drag a high quality and popular product like VET English down to the standard of ELICOS English, which is of such a low standard that it requires it own specific set of standards to keep its providers in check, and forces attendance requirements on students, due to it's lack of popularity and quality.

7. In summary I can't see why the ESOS Act doesn't have ONE set of Standards to cover VET and ELICOS. Is delivery really that different? Looking at the RTO Standards and ELICOS Standards, they are almost identical, so why duplicate? Just so students are forced to sit 20 hours face to face, and pay bloated EA members' exhorbitant prices for poor quality training?

Let ELICOS providers get their own house in order before they start casting aspersions on VET English. Removing VET English removes an alternative, quality controlled option for budget conscious students who prefer to be treated like adults. Introducing this change in the manner suggested hurts students, and providers, and the staff who will lose jobs. The only winners are those who really need better regulation, the current ELICOS providers.