



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

Council of Private Higher Education (COPHE) Inc

## Preliminary

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

Yes

### Organisation Name

Please provide your organisation name (if applicable).

Council of Private Higher Education (COPHE) Inc

### Sector of Delivery

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

Higher Education, with many multi-sector providers

### Are you a member of an industry body?

International Adviser, COPHE

## 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

**We support the implementation schedule.**

## 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

**We support the new definition, especially the application to all courses.**

## 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

#### Response

**We broadly support Standard C1, but there is an argument to allow some online learning, say up to 2 hpw for higher level courses, in line with current education trends.**

### 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

**We support 20 contact hours, although would allow a minimal online component in higher level EAP or Direct Entry (to higher education or VET).**

### 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

**We support Standard P2, including linking to the National Code.**

### 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

**We support Standard P3, except P3.1c, where we would like to see provision in EAP or Direct Entry courses for a few larger group lecture classes to familiarize students preparing for tertiary study with this format. We would also like to see "Direct Entry" as the generic term, rather than EAP, which while widely used is not universally applied.**

### 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

**Re P4.1cii, we would like to see it worded: In the case of Direct Entry courses, assessment outcomes should be benchmarked against external reference points commonly used in admissions criteria for tertiary courses, including tracking studies monitored by an Academic Board or equivalent, and/or peer benchmarking with other providers. Benchmarking with international tests (IELS, TOEFL etc) is very limiting, beyond the full scope of wider academic skills developed in Direct Entry courses, and off-putting to students if mandated.**

### Standard P5 – ELICOS educational resources

No proposed changes to this standard.

#### Response

**We support Standard P5.**

### Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

#### Response

**We support Standard P6.**

### 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

**We support Standard P7.**

### 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

**We support Standard P8.**

### Glossary

Outdated provisions have been revised or removed where appropriate.

#### Response

**We would like include a definition of Direct Entry courses:**

**A course intended to prepare students for tertiary study, to which they may proceed directly upon successful completion of the course.**

### Other comments

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

#### Response

**Overall we support the draft Standards, and appreciate the efforts of the Department and sector stakeholders in their preparation.**

**Our major concern is lack of clarity around the requirement of assessment benchmarking (4.1cii) which needs to include current good practice, and not necessarily default to comparison with international tests (IELTS, TOEFL etc) as other jurisdictions have done to their market detriment.**