



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

Crumps International Pty Ltd

Preliminary

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

Yes

Organisation Name

Please provide your organisation name (if applicable).

Crumps International Pty Ltd

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?

VELG, ACPET

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

The idea of bringing VET English under the ELICOS banner is unnecessary for reasons that will be expanded later. The time frame suggested for such a dramatic and far reaching change is too short for stakeholders to adhere to without unsustainable impacts on many schools.

The proposed time frame requires a longer transition period. In contrast, the previous changes to the RTO standards 2015 took seven months of consultations before decisions were arrived at. Surely if the proposed changes were made, it would be in the best interest of the students to extend the implementation date. We consider an implementation date of 1 July 2019 plus a transition and teach out period of 2 years from 1 July 2019 a more reasonable proposition.

We have planned for VET English that have enrolments and financial commitments beyond 2018, the short implementation time frame will consequently become unsustainable for us.

Furthermore, students have made financial plans that go beyond 1 Jul 2018. The changes will impact on these students who will be the most affected and who do not appear to have been consulted.

Additionally, we feel that the time given to make submissions, 4 weeks, was woefully inadequate. There was insufficient time to allow for affected businesses to consult their industry groups or with each other. The proposed implementation does not give our business time to adjust our business model to make changes to classroom configurations, implement new classroom ratios or allow for sufficient transition period for students who have already enrolled for courses in July 2019.

If the implementation plan were to be imposed, EIP has over 100 students already enrolled for VET English from July 2018 onwards who will be severely impacted. The losses to the business from these 100 students alone amounts to at least \$300,000.

Response

The short time implementation time frame would also mean a loss of business for EIP as we can no longer sell courses based on the old VET English framework. We estimate additional losses of over \$2M. These losses would not be sustainable for EIP.

Given the size of the VET English market to Australia as a whole and given that companies plan up to 24 months ahead, the proposed implementation time frame would no doubt cause reputational damage to our company and Australia's overseas markets and the future earning capacity of the other 124 RTOs registered for VET English.

Being forced to adhere to the proposed implementation plan will result in significant financial losses to EIP and we may be forced to seek compensation and/ or legal remedies in conjunction with similar RTOs.

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 feel the proposed changes to the standards appear to be very poorly thought through. If the intention is to include VET English, we propose that changes to the VETR Act 2011 is also needed especially in relation to the definitions of accredited courses including the interactions of the VET Quality Framework and accreditation processes.

We are confused as to the need to have ELICOS standards applied to VET English. There is no evidence to suggest that VET English is in any way of lesser quality. Furthermore, having RTO Standards, CRICOS Standards, and the VETR quality framework ensures that VET English is every bit as good, if not better than most ELICOS offerings. Those who seek to claim otherwise have a vested, self-serving interest. If there is evidence to show otherwise, we would be very interested to see it.

Furthermore, the triplication of requirements for VET providers to satisfy RTO standards, ELICOS Standards, and CRICOS Standards is excessive red tape which is at odds to what the government and ESOS is trying to reduce. It is therefore our contention that RTO providers of VET English already meet these standards without the need for additional controls heaped over these institutions.

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

Again, the impact and interaction with current VET course assessment and accreditation processes appears to have been overlooked.

Specifically, we refer to the requirements that VET providers have to meet as laid out in the VETR Act 2011. We feel more thought and consultation is required in relation to the mandatory requirements for course applications.

More importantly, we feel that VET English is targeted at students who want to learn and apply

Response

English in practical working environments. Consequently, VET English is based on training students how to apply English in a work setting like writing emails, write CVs, make presentations, attend job interviews etc. They are focussed on preparing for employment.

ELICOS on the other hand is an intense language course focusing on language fluency and structure – while there are overlaps, ELICOS courses are very different from VET English. In our view, enforcing ELICOS standards on VET English could be detrimental to VET English standards. To this effect, we ask: How can applying the proposed ELICOS standards satisfy the “fit for purpose” test? If anything, it is our view the proposed ELICOS standard DETRACTS from the “fit for purpose” test as well as the “enhancing the student experience” test.

Finally, we contend that any changes to these mandatory requirements must consider how the units in the VETR are impacted. For instance – VET courses are now nationally accredited courses, is the intention to make ELICOS courses nationally accredited as well? If so, BOTH the VETR Act and the ESOS Act must be considered together. This does not appear to be the case.

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

Our concerns regarding the interaction between VET English Proficiency courses and ELICOS courses continue here.

Currently, VET English Proficiency courses do not require 20 hours face to face tuition which allows flexibility for students to study and work at the same time (albeit limited to 20 hours of work).

VET courses can therefore be structured around student needs that allow them to apply classroom learnings to their workplace.

Additionally, the majority of VET English students in EIP already come with degrees or other higher qualifications from their home country. Forcing the mandatory 20hr face to face tuition requirement is an unnecessary backward step and does not meet the challenging needs of the 21st Century adult student.

As stated earlier, the primary purpose of VET English is to prepare students for the work place and to use the language in their workplace. In contrast, ELICOS is focused on language fluency which is a world away from preparing students for applying the language in the workplace. VET and ELICOS are consequently very different products and they serve very different purposes.

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 feel that imposing a 20-hr face to face mandatory tuition requirement could make sense to students under 18 years of age. However, as stated above, applying to over 18s would be “anti-adult” and appears to serve no purpose except to create more red tape.

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

Response

Due to age, maturity, qualifications and experience of our English cohort, we believe a higher ratio is appropriate for the delivery of training in vocational skills and knowledge.

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

This is another example of how the interaction between VETR has not been sufficiently thought through.

VET assesses competency in the workplace while ELICOS tests for language fluency not necessarily in a work environment.

VET English currently already needs to be assessed according to VETR's quality framework.

Applying the proposed ELICOS standards seems to overwrite this. Is this the intention? If so, where is the statement that clearly states that ELICOS standards overwrites VETR's quality framework? In the assessment of VET English, which standard prevails? As the proposed changes stand now, it is unclear.

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

The need for a qualified Trainer & Assessor, with Certificate IV in TESOL to now have a university degree to deliver vocational English courses is an unnecessary and overly heavy requirement.

As an RTO that employs trainers with decade plus experience in VET English training to now be asked to require them to hold a degree or diploma (3 years full-time) is unreasonable and again, simply unnecessary given their actual training experience and first-hand knowledge.

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

No comment

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

No comment

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

No comment

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

EIP does not have issues with the ELICOS standards as it applies to ELICOS courses. In fact, we support the standards and the proposed changes AS THEY APPLY TO ELICOS.

However, we do have major objections if VET English is “captured” by the application of ELICOS standards. Our reasons are detailed above but we summarise them below:

1. VET English is distinct from ELICOS English. VET is targeted at students who want to learn and apply English in practical working environments. ELICOS on the other hand is an intense language course focusing on language fluency and structure – while there are overlaps, ELICOS courses are very different from VET English. We feel the current distinction is appropriate, serves different educational purposes and strives for different learning outcomes, and as such should not be changed.

2. Imposing a 20 hr face to face tuition time on VET English will severely impact on the quality of VET English. The majority of VET English students already have degrees or higher qualifications from their home country where they have studied 3 or 4 years full time. These students already know how to successfully study at a high level and to manage their time. In addition, forcing any modern day students to sit in on 20 hours of face to face detracts from the challenging needs of the 21st Century adult student.

3. Woefully inadequate consultation process. The industry has been given only 4 weeks to study and comment on the proposed changes. While the timing may be beneficial for ELICOS providers, it certainly is not for VET English providers given the major ramifications these changes can have on the VET sector.

Furthermore, the proposed implementation timetable gives existing participants less than 12 months to implement changes that will have major implications on the sustainability of businesses and threatening the integrity and reputation of an export industry worth over \$10 billion Australian dollars. Not to mention the damage to Australia’s educational standing overseas. Surely this cannot be the intention of government. If the changes were to go ahead, an implementation date of 1 July 2019 with a 24-month transition period would be more acceptable for existing participants.

Ultimately, the most important stakeholder (the student) seems to have been forgotten. VET English training serves a particular need in the industry where adult students can come to Australia, learn English in a practical environment, experience the Australian lifestyle, hospitality and develop long term social and business connections overall.

These changes only serve to confuse the market and cause major negative impacts on a sector that

Response

makes a sizable contribution to the Australian economy.

4. Increasing bureaucracy and confusion. Bringing VET English under ELICOS framework only serves to add another layer of bureaucracy with no evidential benefit – ie CRICOS, VETR and now ELICOS standards. To what benefit? VET English is a nationally accredited course, how will they now be impacted by ELICOS standards? Which standard prevails?

Furthermore, there is no evidence that VET English is in any way of lesser quality. RTO Standards, CRICOS Standards, and the industry itself ensures that VET English is every bit as good, if not better than most ELICOS offerings.

In conclusion, while we can see the need to clarify certain standards in the ELICOS sector, we continue to contend that it would be wrong and damaging to Australia's international reputation and its financial wellbeing by implementing such a change without sufficient consultation and sensible implementation process.

Crumps International Pty Ltd (trading as English in Paradise) has been in businesses for over 16 years. We are immensely proud of the achievements and contributions to the quality and standards of VET English.

We are passionate about our quality and the integrity of our courses which are constantly updated and improved to surpass the needs of the current industry and our customers (the students). Our students receive the most cutting edge delivery techniques and resources provided by English trainers with over 120 years of collective English training experience.

We have made significant investments in this business and these changes will put at risk all the effort and resources applied over the past 16 years. The fact that some new industry participants may engage in unsustainable and dubious practices does not justify the proposed changes to the industry where the majority are striving to meet the student needs and complying with the laws as a whole. The proposed changes will have the effect of destroying businesses that do the right thing for the student on account of a small number of rogues.

As one of the pioneers of VET English (of over 9 years) who have stayed true to the values of our motto of Substance, Theory and Excellence we would relish the opportunity to be involved in further consultations to get the correct balance for VET English to continue to serve the needs of the student.