



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

Dynamic Management Group Pty Ltd

Preliminary

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

Yes

Organisation Name

Please provide your organisation name (if applicable).

Dynamic Management Group Pty Ltd

Sector of Delivery

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

Combination of VET and International CRICOS

Are you a member of an industry body?

Yes - 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 staged approach time frames are sufficient for new and existing providers.

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

Sufficient explanation provided in the introduction for ELICOS. The reference statement in the introduction related to improvement in English for work or career purposes should not be included as the VET English is separate to Academic (ELICOS) English. For example: if all English is to be included in the ELICOS Standards under this model there must be evidence of the following for training staff:

- 1. Holding of TAE40110 Qualification or above**
- 2. Industry currency - vocational area specific**
- 3. Industry engagement - working very closely with industry to determine what level and type of English should be delivered to meet the needs of the industry and workforce. This will provide the student receiving English education the opportunity for real workbased English proficiency. Therefore, we strongly suggest that VET English courses and ELICOS course remain totally separate.**

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

Clear explanation for course application requirements provided in Standard C1.

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

Sufficient reference to mandatory 20 hours for ELICOS English courses only. VET English require blended learning methodology to allow improvement in English based on real life English utilised in the workforce. Again, supporting our recommendation for the VET English Proficiency courses to remain separate from ELICOS standards.

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

Agreed

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

Agreed

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

Response

Agreed

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

Agreed

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

Agreed - ELICOS only

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

Agreed

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

Agreed

Glossary

Outdated provisions have been revised or removed where appropriate.

Response

Agreed

Other comments

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

Response

The change "all English language courses that are solely or predominantly of English language instruction would be considered ELICOS and would need to meet the ELICOS Standards..." We do not agree with this change as VET English courses focus on the delivery of English proficiency to meet the needs of industry and the workforce. This provides international students with the unique opportunity of being able to improve their English whilst gaining invaluable skills, knowledge and attitude for future employment opportunities. ELICOS and VET English should remain totally separate and current providers delivering VET English courses should not be required to register under ELICOS Standards.