



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

Independent Schools Council of Australia

## Preliminary

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

Yes

### Organisation Name

Please provide your organisation name (if applicable).

Independent Schools Council of Australia

### Sector of Delivery

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

Schools

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

ISCA is the peak body for Independent schools in Australia

## 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

**ISCA supports a staged implementation process.**

**We recommend support materials that explicitly identify the changes required for transition to the new standards be provided to assist 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

**ISCA suggests the definition of an ELICOS course includes clarification that as an “intensive” course, the course must be full-time / a minimum of 20 contact hours per week (as required under Standard P1) and that, for courses that do not fall within the definition, the school sector is explicitly identified in the second dot point:**

- **English as a second language programs or support services provided within the school sector as part of a school curriculum.**

**This is to avoid any confusion about which courses may or may not be captured the definition.**

## 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

ISCA suggests the wording to the introduction of C1.1 be amended to reflect changes to ESOS following establishment of national regulators for higher education and VET sectors:

**C1.1** Course applications are provided in the format required by the ESOS agency and where relevant, designated State authority, are fit for purpose and include:

Following the establishment of TEQSA and ASQA, the designated State authorities are only responsible for school sector providers within their jurisdictions.

## 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

ISCA suggests “a minimum of” be added to Standard P1.1 to be consistent with the requirements for written agreements in P1.2 a).

**P1.1** An ELICOS course has a minimum of 20 hours of face-to-face tuition per week.

(Also in C1.1 o) - overall structure of the course demonstrating that it meets the requirement of a minimum of 20 hours of face-to-face classes).

Any additional program hours - for example, attending provider organised events - above the minimum requirement of face-to-face tuition would need to be appropriately supervised for students under 18 years of age.

## 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

ISCA recommends that overall, requirements for younger ELICOS students (i.e., under 18 years of age) be strengthened, for example, by making explicit mention of state and territory child protection requirements, or where special consideration needs to be given to age appropriateness of facilities, resources, qualifications of staff working with younger students, etc.

ISCA’s suggested changes for Standard P2 – Needs of younger ELICOS students are:

**Outcome of Standard P2:** Where a registered ELICOS provider enrolls students under the age of 18 years, the operations and facilities of the provider are appropriate for the age, maturity and English language proficiency of the students.

**P2.1** The provider’s arrangements for students aged under 18 years of age comply with Standard 5 of the National Code, and any applicable state or territory child protection requirements.

**P2.2** Facilities and operations for any mixed-age cohorts of students under and over the age of

## Response

18 years are designed to meet the needs of students of different levels of age, maturity and English language proficiency and ensure they have access to services, learning opportunities, facilities, resources and equipment that addresses their English language learning needs.

## 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

ISCA suggests Standard P3.3 a) and P4.2a) retention and accessibility of records includes a reference to ESOS Act 2000 s.21(3)\* if this is for two years after cessation of enrolment, or clarifies the period of time required if this is not the case.

\* ESOS Act 2000 s.21(3) The provider must retain records kept under this section for at least 2 years after the person ceases to be an accepted student. However, the records do not need to be kept up-to-date after the cessation.

ISCA suggests further consideration be given to the requirements for providers to have policies and procedures to ensure

P.3.1 b) students' special learning needs are identified as early as possible and arrangements are put in place to address these needs

The term "special learning needs" should only apply within a TESOL context, and not more widely – for example to students with disabilities or learning difficulties in need of specialist support services.

ELICOS teachers can be expected to cater for different learning styles of students within their area of specialisation but not with undisclosed "special needs" of students outside teaching of English as a second or other language.

ISCA supports P.3.1.c) teacher-to-student ratios do not exceed 1:18 per class, but would suggest this ratio is more suited to classes of students with higher levels of English proficiency. To maintain a quality reputation for ELICOS delivery in Australia, 18 in a class should be considered the maximum number of students rather than norm.

## 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

ISCA suggests that further consideration be given to the wording of the following:

P4.1 c) (i) includes appropriate oversight or moderation of assessment outcomes

It would be useful for a definition of "moderation" to be included in the glossary. It has been suggested that "standardisation", for example, might better describe the assessment procedures commonly used in schools, so some clarification about expectations of assessment processes would be welcome, with any terms included in the glossary for additional information.

P4.1 c) (ii) in the case of English for Academic Purposes courses, assessment outcomes should be benchmarked against external reference points commonly used in admission criteria for tertiary courses

## Response

It is unclear what is intended by “benchmarked” in this context. It would be better perhaps to have wording which made clear how the assessment outcomes, or exit proficiency levels that a student can demonstrate at the end of an ELICOS / enabling course (and not just EAP courses, as there are also HSP courses in the schools sector) might align with the entry requirements of the student’s next course.

## Standard P5 – ELICOS educational resources

No proposed changes to this standard.

## Response

ISCA suggests this Standard be strengthened where relevant to cater for the needs of younger ELICOS students, for example:

P5.1 b) are appropriate for the age of the student and type and level of courses offered

P5.2

b) where the registered ELICOS provider makes material available for self-access or self-study, that material is age appropriate, catalogued and presented for easy access

c) self-study areas and equipment organised to facilitate access and independent use by adult students

d) appropriately supervised and monitored study areas, internet use and equipment for use by students under 18 years

## Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

## Response

ISCA suggests this Standard be strengthened where relevant to cater for the needs of younger ELICOS students, for example:

**Outcome of Standard P6: Registered ELICOS providers employ suitably qualified specialist staff and provide them with ongoing opportunities for professional development. Staff interacting with students under 18 years meet any state or territory child protection requirements, including police checks if not undertaken as part of teacher registration processes.**

P6.1 Where the registered ELICOS provider offers courses of preparation for entry to Australian state or territory secondary schools, an appropriate percentage of the TESOL teachers are registered to teach in the Australian state or territory primary/secondary system as determined by state/territory legislation or policy.

ISCA recommends that P6.1 be more specific than “an appropriate percentage”. For students articulating from ELICOS into schools, it’s important for their TESOL teachers to also have a detailed understanding of the curriculum and assessment requirements of the school system they will be entering, and these vary in each state and territory. It would be more “appropriate” for there to be a “majority” of ELICOS teachers also registered as teachers within the respective jurisdictions in this case.

P6.2 Where students are 12 years old or less, their teachers hold a TESOL qualification and a recognised primary teaching qualification.

P6.3 The registered ELICOS provider verifies the qualifications of all teachers employed by the provider.

P6.4 Where the registered ELICOS provider employs staff who teach or otherwise interact with students under 18 years of age, the registered ELICOS provider verifies that staff have appropriate clearances to work with children and other meet any other requirements under Standard 5 of the

## Response

National Code.

### 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

ISCA suggests this Standard be strengthened where relevant to cater for the needs of younger ELICOS students, for example:

**P7.2** The registered ELICOS provider ensures that students are safe and have access to age appropriate facilities that support their education, including circumstances...

**P7.3 a)** rooms and equipment are fit for purpose and proportionate or appropriate to the age of students, number of students and course syllabus

### 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

ISCA suggests it should not be necessary for not-for profit, non-government schools in receipt of Commonwealth funding to also be required to provide "a full audit report of its financial accounts from a qualified and independent auditor to a designated State authority, as these schools already demonstrate financial accountability to state and Commonwealth governments in other ways.

### Glossary

Outdated provisions have been revised or removed where appropriate.

## Response

Please see above for suggestions for Glossary.

### Other comments

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

## Response

ISCA welcomes the opportunity to provide feedback on the Draft ELICOS Standards from a school sector perspective.