



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

Inforum Education Australia

## Preliminary

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

Yes

### Organisation Name

Please provide your organisation name (if applicable).

Inforum Education Australia

### Sector of Delivery

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

ELICOS

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

NEAS, ASQA

## 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

Good

## 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

**Can we be clear on this? That the ELICOS Standards will also apply to Certificates I, II, III, IV in English proficiency and that these standards will be policed. There are many VET colleges who deliver these cert courses and unlike those of us whose courses are governed by the National Standards, the certificate courses do not require students to attend for 20 hours of face-to-face instruction per week. This gives our competitors an unfair cost advantage. I believe that 20 hours/week face-to-face should be an industry standard.**

## 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

I agree

### 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

Good

### 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

Good

### 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

**Good. I agree that a teacher-to-student ration of 1:18 should continue.**

### 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

Fine

### Standard P5 – ELICOS educational resources

No proposed changes to this standard.

#### Response

**P5.2 c) Personally, I don't believe that self-study areas are of much use or interest to students. It's a throw-back to a pre-digital era. Money is better spent on what today's students are looking for, namely high-speed Wi-Fi connections with business-grade speeds so that students can access online learning materials, including wikis created by their teachers, whenever and wherever they want.**

## Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

## 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

## 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

## Glossary

Outdated provisions have been revised or removed where appropriate.

Response

## Other comments

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

Response

**I think the current National Standards are realistic and have served the industry well and I'm heartened that there are not many undue changes in the proposed standards. As mentioned earlier, I would hope that the new ELICOS National Standards will apply to the VET sector certificate courses as well.**

**Thank you for the opportunity to review the changes.**