



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

Macquarie English Language Centre

## Preliminary

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

Yes

### Organisation Name

Please provide your organisation name (if applicable).

Macquarie English Language Centre

### 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?

Yes. English 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

**This staged approach makes sense.**

## 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 believe it is critical that all courses providing intensive English should be subject to the same standards.**

## 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

**We endorse this standard.**

### 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 endorse the direct reference to 20 f2f hrs per week of tuition.**

### 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

**It is critical to acknowledge the differing needs of younger students and we endorse this standard.**

### 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.**

**Also a comment re Standard P3.1 c) teacher-to-student ratios do not exceed 1:18 per class MQ ELC recognises the need to maintain an industry standard of quality language teaching, and therefore supports a 1:18 teacher to student ratio on the whole.**

**It also recognises operational constraints such as visa issuing delays, and supports slightly more flexible scenarios that cater for last-minute student enrolments and arrivals, such as an average of 18 across classes, with a maximum of 19 students per class. This would allow for a very limited number of classes spilling to 19 without the challenge of opening extra classes and sourcing more teachers and classrooms.**

### 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

**MQ ELC supports the need to benchmark against external reference points, but has two concerns regarding the wording of this standard:**

- i) 'English for Academic Purposes' covers a broad range of language proficiency levels, therefore a more appropriate term for courses needing to be benchmarked would be 'Direct Entry Programs'.**
- ii) Proficiency tests used as admissions criteria for tertiary courses are not considered appropriate external reference points. Such tests do not encompass the specific academic skills required in a**

#### Response

tertiary setting, and therefore benchmarking to these would be an inaccurate standard against which to measure Direct Entry Program assessment outcomes. MQ ELC recommends benchmarking against other quality university ELICOS providers.

### Standard P5 – ELICOS educational resources

No proposed changes to this standard.

#### Response

### Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

#### Response

MQ ELC recognises the need to offer flexibility regarding appropriate teacher qualifications, yet is concerned that the standard is expressed vaguely and lacks rigour. We recommend:

- i) a tightening of the wording to clarify that teachers must hold qualifications a), b), AND c)
- ii) deleting the acceptance of formal mentoring by a senior staff member and replacing it with a requirement of at least 6 hours' practicum undertaken within the teaching qualification

### 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

Agree this is a good amendment.

### 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