



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

Phoenix Academy

Preliminary

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

Yes

Organisation Name

Please provide your organisation name (if applicable).

Phoenix Academy

Sector of Delivery

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

ELICOS and VET

Are you a member of an industry body?

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

I am satisfied with the time frame suggested for implementation

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

Welcome this clarification

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

Response

Satisfied with 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

I believe that a strong syllabus that is supported with a rigorous LMS can accommodate a blended delivery ratio of 15 hours of face to face and 5 hours of monitored on line instruction

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

Standard P2 Needs of Younger ELICOS students

This is a long overdue area which needs to be addressed. Risky practices have been followed by many ELICOS providers where young learners are co-located with adults.

The needs of young learners in the classroom and outside the classroom are quite different to those of adults.

Co-location of children and adults in the same classrooms does not reflect well on a quality industry.

At the very least institutions who enrol children should be required to adhere to the following practices:

- (i) All staff must hold the Working with Children Card and any other appropriate child protection screening of staff practices whether for support staff or academic staff**
- (ii) There must be a clear policy for the care of Minors which reflects all statutory laws related to the care of children**
- (iii) Homestay arrangements and other services must reflect the special need of children**
- (iv) Supervision of children during break times, excursions and out of school activities must reflect their needs**
- (v) Teaching resources and pedagogy must reflective the cognitive stage of development per the child's age**
- (vi) Teachers should have experience and preferably qualifications in teaching children**

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

Agree with this requirement

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

Phoenix urges that ELICOS institutions offering English for Academic Purposes Courses with mature and successful relationships with universities that they prepare students for be allowed to maintain those strong articulation pathways.

There are many iterations of benchmarked, externally validated assessment systems that suffice . Phoenix and many Australian universities utilize the CEFR, (see Monash website below), some use the PTE, others the IELTS , each has established and rigorous systems that work well.

The change to National Standards should be addressing those ELICOS providers who do not have a well-structured and rigorous system, of describing language competency and rely on nebulous reporting descriptors such as “Good”, “Advanced” etc. For those of us that have established and well utilized systems of articulation in place they should be allowed to stand and we should not be required to change to a uniform mandatory admission criteria.

Background to the CEFR

The CEFR is used to describe achievements of learners of foreign languages (including English), across Europe. It was created by the Council of Europe as the main part of the project "Language Learning for European Citizenship" between 1989 and 1996. Its main aim is to provide a method of assessing and teaching which applies to all languages in Europe. In November 2001, a European Union Council Resolution recommended using the CEFR to set up systems of validation of language ability.

More importantly, the Council of Europe and the British Council have mapped the CEFR against the IELTS and TOEFL and this mapping has now become an internationally accepted language reference system.

In fact, all IELTS results/reports now display a CEFR level against the overall IELTS Band score.

The CEFR is commonly used across all ASEAN universities and there is movement in China to replace the CET with the CEFR for reporting competency in English at the end of Senior 3.

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

Support

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

Also add that ELICOS teachers teaching young learners should have young learners qualification/experience

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

Agree especially that young learners have a separate location to adults and a place to play away from adults.

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

Support

Other comments

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

Response