



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

The Eagle Academy

## Preliminary

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

Yes

### Organisation Name

Please provide your organisation name (if applicable).

The Eagle Academy

### Sector of Delivery

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

VET

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

## 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

**Further thought and planning must go into how this change will negatively impact on students who are currently studying or currently hold a COE and Visa for a VET English course. Will you provide a complaints and feedback support team for students who do not want to transfer from VET English to ELICOS? How will this affect their Visa? Who will pay for the difference in course fees? VET providers will be equally burdened by the outcome of either losing VET students not wishing to transfer or having to heavily reduce prices to help support VET students who choose to transfer.**

## 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

**This change brings VET English under ELICOS. The main difference is the requirement for students to sit in a classroom for 20 hours per week face to face or risk being reported. The draft of a revised National Code of Practice for Providers of Education and Training to Overseas Students 2007 (National Code) is suggesting an increase from 25% to 33% for online learning. The ESOS site states "Proposed changes aim to modernise and simplify the National Code so it can be easily applied by providers and regulators and increase flexibility where appropriate and relevant for international students". The intention of these Proposed revisions to the English Language Intensive Courses for Overseas Students (ELICOS) standards is a contradiction of the planned changes to the National Code. How can Australia continue to provide a fair and accessible system that supports international students by only providing one mode of delivery to a large portion of**

#### Response

**International students? What reasons do you have for deciding that 20 hours a week face to face is the only acceptable way of learning English?**

### 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

**RTO providers of VET English already meet these standards except compulsory attendance. Adding additional Red Tape (ELICOS Standards in addition to RTO standards & CRICOS Standards) doesn't make sense when the VET product is a high quality and popular choice for many International students. Why not focus on improving (non RTO) ELICOS providers' standards instead?**

### 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 there is absolutely no evidence to show that the ELICOS 20 hours face to face delivery model is more beneficial than a VET 15/5 blended delivery model. It's simply nonsensical to assume that every international student studying in Australia will progress best under ELICOS. How is this delivery model an indicator of quality education? What basis do you have for deciding this model is best?**

### 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 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

### 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

## Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

## 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

**What consultation took place before these revisions were drafted? It appears that the most affected stakeholders, VET English students, were not consulted or surveyed about the quality of their education, their satisfaction with their education, and the effects that these revisions might**

## Response

have on them. Forcing thousands of students to change courses with little warning is unfair and I anticipate numerous complaints if this change is to go ahead with any less than a 12 month transition period for students. The second most affected stake holders, VET English providers, were also not consulted. How can a consultation process be considered as valid and fair when it wasn't conducted throughout the industry?