



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

Universities Australia

Preliminary

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

Yes

Organisation Name

Please provide your organisation name (if applicable).

Universities Australia

Sector of Delivery

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

Higher Education

Are you a member of an industry body?

No

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

The implementation plan seems reasonable.

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

The definition of ELICOS is an essential clarification of what constitutes an English language program, and removes the lack of clarity that has existed to date and which has enabled English programs to be delivered outside the parameters of the ELICOS National Standards. This has caused inequity among providers of English language programs and brought the general integrity of Australian English language programs into question.
The reference to “English as a second language” should be updated to the more current “English as an Additional Language”.

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

Standard C1.1(b) refers to “...details of course proponent”. It is not immediately clear as to what “course proponent” refers to or whether the use of the term “proponent” might be a typographical error.

For the sake of consistency all references to 20 hours of face-to-face tuition should state “a minimum” of 20 hours of face-to-face tuition.

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

For the sake of consistency all references to 20 hours of face-to-face tuition should state “a minimum” of 20 hours of face-to-face 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

No comments with regard to 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

A teacher to student ratio of 1:18 per class is higher than exists among many international competitors in the English language teaching space. As such any increase to this ratio has the potential to impact on Australia’s competitiveness. Class size is an important factor in the personalised nature of ELICOS, and the ratio of 1:18 should be retained in the Standards to maintain consistency across providers.

There is concern about this ratio in circumstances such as the simulation of lectures as a learning activity and the need to accommodate a late arriving student once classes have been formed for a teaching period. For the former, there are sound pedagogic reasons for incorporating lectures as part of a learning program for students preparing for higher education, and the Standards could include wording to allow for classes to be combined to accommodate lectures without the need for 1:18 for that particular activity, provided the 1:18 ratio is applied to total enrolments on the

Response

class roll for the course the student is undertaking. For the latter, there should be options within each institution's operational procedures to deal with late arrivals without compromising class size, and allowing a greater than 1:18 ratio could be open to abuse by unscrupulous operators so is best left as is.

P3.1(b) refers to "students' special learning needs". Members felt that clarity might come from a clearer definition as to what is meant by "special learning needs". Furthermore, does such a definition include students who are repeating a program an excessive number of times?

Standard P3.2(c) refers to "special purpose course content". This could be viewed as being ambiguous and it's not clear as to whether it is referring to English for Special Purposes (ESP) program, and whether in this particular context, special course requirements includes, General English, Exam Preparation and EAP?

Further information regarding how long records needs to be retained by a provider (P.3.3(a)) and the conditions under which students and others may be able to access such records would be welcomed.

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

The term "English for Academic Purposes" is widely-used but is not necessarily linked to students at a particular English language proficiency level or studying for a particular purpose, so it is not appropriate to require benchmarking of assessment outcomes for all students studying English for Academic Purposes. What is intended, and should be explicitly stated, is that courses that exist for the purpose of transitioning students directly into higher education without the need for an external proficiency test (commonly, but not universally, known as 'direct entry programs') should be benchmarked.

Benchmarking of these courses is appropriate, but not against "external reference points commonly used in admission criteria for tertiary courses". The intention appears to be that 'direct entry programs' should be benchmarked against commonly used English language testing systems such as IELTS or equivalent. However, it is best practice in 'direct entry programs' to include a significant focus on academic literacy to better prepare students for tertiary study than they would be by having simply studied a test preparation course to achieve the required English proficiency level. If the focus in 'direct entry programs' were to shift to test preparation and students were required to sit an external proficiency test to progress into higher education, the sector would no longer be competitive in this space which might lead to the demise of 'direct entry programs'. If all students could enter higher education only by providing an external proficiency test score, the deficiencies in academic literacy and study skills among students coming from academic backgrounds that do not foreground such skills would have a profound impact on their ability to succeed.

To benchmark 'direct entry programs', the Standards could include a requirement for institutional tracking studies to compare the GPAs of students entering from 'direct entry programs' against those who achieved minimum entry scores via different means (for example, students who entered with minimum acceptable IELTS scores). Providers who comply with best practice already

Response

have in place processes for standardisation and moderation, but it could also be a requirement that sample marking against set criteria should be undertaken by a suitably qualified external marker.

Standard P5 – ELICOS educational resources

No proposed changes to this standard.

Response

No comments with regard to this Standard.

Standard P6 – ELICOS specialist staff

No proposed changes to this standard.

Response

Whilst no changes have been made to this Standard, members have expressed a desire to have clarification provided regarding whether a minimum percentage of registered teaching staff is defined in any attendant document?

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

No comments with regard to this Standard.

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

No comments with regard to this Standard.

Glossary

Outdated provisions have been revised or removed where appropriate.

Response

The inclusion of "supervised study session" and "course-related information sessions" in the definition of "scheduled course contact hours", blurs the distinction of what can be counted as part of the 20 hours of face to face tuition stipulated in Standar

Other comments

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

Response
