



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

University of Sydney Centre for English Teaching

Preliminary

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

Yes

Organisation Name

Please provide your organisation name (if applicable).

University of Sydney Centre for English Teaching

Sector of Delivery

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

ELICOS and Higher Education

Are you a member of an industry body?

English Australia, NEAS, UECA

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 University of Sydney Centre for English Teaching is comfortable with the staged implementation. The implementation date of 1 July 2018 for existing providers allows adequate time to make the required changes.

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 University of Sydney Centre for English Teaching broadly agrees with the draft changes in the introduction to the ELICOS National 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

The University of Sydney Centre for English Teaching is in agreement with the draft changes to Standard 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

The University of Sydney Centre for English Teaching strongly supports preserving the 20 hours of face-to-face English Language instruction for ELICOS courses. There is a need to integrate online learning into ELICOS courses, both through blended learning approaches and self-directed study. However, in order to maintain a quality student experience for English as a second language learners, it is essential that 20 hours of face-to-face teaching is provided. Any self-directed online learning or blended learning outside of the classroom should be in addition to the 20 hours face-to-face.

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

The University of Sydney Centre for English Teaching is in agreement with the draft changes to Standard P2.

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

The University of Sydney Centre for English Teaching is in agreement with the proposed change in terms of the requirement for retention and accessibility of records. Furthermore, in regards to Standard P3, we would like to add that we strongly support preserving the teacher-to-student ratio of 1:18 for ELICOS courses. Preserving this ratio is essential to maintaining a quality student experience and effective English Language learning.

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 University of Sydney Centre for English Teaching broadly supports the draft changes in regards to Assessment of ELICOS students. Whilst the University whole-heartedly supports the idea of benchmarking, there are some concerns about the details contained in standard P4.1 c) (ii). First, in the ELICOS industry there is a range of 'English for Academic Purposes' (EAP) courses catering to students with language proficiency levels from pre-intermediate to advanced. In the case of lower level EAP courses, and courses where students may not be targeting university entry, it would not be appropriate to benchmark these courses against 'external reference points commonly used in admission criteria for tertiary courses'. If it is intended that all EAP courses be benchmarked, then different criteria will need to be used for those EAP courses that do not cater to university pathway students. To clarify relevant benchmarking measures we recommend that the clause is amended to draw a distinction between EAP courses and EAP courses that cater to university pathway students.

Our second concern relates to the critical need for 'English for Academic Purposes' (EAP) courses that cater for university pathway students to develop both English language proficiency for an academic context and skills related to academic preparedness such as research skills, critical thinking and study strategies. Benchmarking 'against external reference points commonly used in admission criteria for tertiary courses' could be interpreted as requiring comparison only with IELTS or other standardised English language tests. If this occurs there would be no benchmarking of students' acquisition of other fundamentally important skills for academic preparedness that EAP university pathway courses must also develop. Furthermore, benchmarking solely against these standardised tests could cause EAP courses for university pathway students to focus primarily on test-preparation type classes, and forego the important academic skills preparation components of the courses.

We therefore recommend that the standards include a requirement that EAP courses for university pathways students are benchmarked using a variety of external benchmarking measures that provide a comprehensive picture of a student's preparedness for university.

The benchmarking undertaken should include evidence that the exit proficiency levels of students are aligned with degree requirements. Employing a range of benchmarking measures will help ensure the quality of the courses and of the learning outcomes achieved by students. It will also ensure that the EAP courses are meeting students' needs and those of the academic institutions in which they are seeking to study. Such benchmarking measures could include comparison with external standardised tests. They could also include, for example, cohort tracking studies which examine the level of academic preparedness of university pathways students via their performance at university, against those entering via alternative pathways (such as those who meet the minimum IELTS entry requirements).

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

The University of Sydney Centre for English teaching is in agreement with the proposed changes to Standard P7.

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

The University of Sydney Centre for English teaching is in agreement with the proposed changes to Standard P8.

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