

# Position Statement 'VET English' courses



## Background

English Language Intensive Courses for Overseas Students (**ELICOS**) provision takes place across a range of different provider types including stand-alone ELICOS only providers as well as those that also deliver school, vocational and higher education courses.

The National Standards for ELICOS providers and courses (**ELICOS Standards**) are guidelines for regulatory authorities to make recommendations for acceptance of providers to be registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) under the ESOS legislative framework.

ELICOS applies to students studying in Australia on student visas. **'Intensive' denotes full-time study comprising a minimum of 20 scheduled course contact hours per week of face-to-face classes of English language instruction.**

In July 2011 the ELICOS Standards were made legislative instruments under ESOS. **All ELICOS providers are now required to meet the Standards to be registered on CRICOS.**

There are currently two broad categorisations of English language courses registered on CRICOS:

### ➤ Non AQF Award vs AQF Award

Whilst the majority of students enrol in non-award courses, there are a huge variety of the latter registered on CRICOS, including: Certificates I-IV in ESL, Certificates I-IV in Spoken & Written English etc.

The current CRICOS registration process under ASQA allows providers to self-designate the field of education under which they register their courses. The majority of English language courses are registered as 091501 – *ELICOS*. English courses that are categorised under different fields of education, however, are not defined as ELICOS and the ELICOS Standards are not applied to these courses (the term 'VET English' has emerged into common usage for these courses).

## The Issues

English language courses are registered on CRICOS inconsistently across a range of different fields of education. This has a number of significant potential implications.

English language courses categorised as 'VET English' on CRICOS are not being assessed against the ELICOS Standards. These standards cover key areas that impact both on quality and a college's cost structures including:

- maximum class size [P3.1.d. *'teacher-to-student ratios do not exceed 1:18 per class'*]
- ELICOS specialist staff [P6 *'Registered ELICOS providers employ suitably qualified specialist staff and provide them with ongoing opportunities for professional development.'*]
- attendance [P1.1.a. *'a minimum of 20 scheduled course contact hours per week of face-to-face classes of English language instruction for the course'*]

Of primary concern, however, is the opportunity for colleges with their English language programs registered as VET to apply the attendance waiver under Standard 11 of the National Code<sup>1</sup>. If students are not required to attend for 20 hours each week (as per the definition of ELICOS), the costs of having classes under 18 students and paying qualified teachers become irrelevant as colleges don't even have to pay for staff or classroom rental.

The above factors have led to an increase in the number of English language courses being advertised to students at an extremely low price, with no attendance requirements.

Whilst the number of international students enrolled in these English language courses is relatively small, there is anecdotal evidence of a strong growth trend in these numbers as more and more providers see 'VET English' courses as an option with lower requirements.

## English Australia Position – key points

English Australia believes that **all English language courses that are registered on CRICOS should be categorised as ELICOS as a matter of urgency**, with the intention that:

- all providers of English language programs should be required to meet the ELICOS Standards for providers;
- all English language courses should be required to meet the ELICOS Standards for courses;
- all international students holding student visas and undertaking English language programs should be required to meet minimum 20 hours face-to-face per week requirement

The principle that should apply is that the requirements for the provision of English language intensive courses for overseas students should be consistent across all providers, thus ensuring consistent quality and protecting Australia's reputation.

In being required to meet the same standards, all providers of English language intensive courses for overseas students will therefore operate on a level playing field in terms of costs and this should therefore lead to a pricing structure for the industry that reflects the actual costs of delivery under a quality framework that mandates attendance, limits class size and requires the employment of ELICOS specialist staff.

Such an approach would :

- minimise the risk to visa integrity – if students take courses without attendance requirements they can work unfettered and are much more likely to exceed the 40hr per fortnight limit;
- minimise the risk to Australia's reputation for quality - how can students learn English without face to face elements;
- maximise the protection of student rights.

English Australia believes that in addition to taking this step, **ASQA should utilise English language experts to immediately audit the course progress monitoring practices of all providers of 'VET English' courses to ensure that they are implementing appropriate mechanisms to compensate for the lack of face-to-face teaching.**

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<sup>1</sup> If VET providers implement the DEEWR–DIAC approved course progress policy and procedures, they do not need to monitor attendance.