APPENDIX 8: ELICOS ACCREDITATION HANDBOOK

17: ELICOS ACCREDITATION
19: Handbook
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23: February 2002
46: (c) NEAS Australia
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107: AMEP Adult Migrant English Program
108:
109: CRICOS Commonwealth Register of Institutions and Courses for Overseas Students
110:
111: DEST Department of Education, Science and Training
112:
113: DIMIA Department of Immigration and Multicultural and Indigenous Affairs
114:
115: EA English Australia
116:
117: EDS English for Domestic Students
118:
119: EIS English for International Students
120:
121: ELICOS English Language Intensive Courses for Overseas Students
122:
123: ELT English Language Teaching
124:
125: ESOS Education Services for Overseas Students Act 2000
126:
127: (the ESOS Act)
128:
129: NAP NEAS Assessment Panel
130:
131: NEAS National ELT Accreditation Scheme
132:
133: OSHC Overseas Student Health Cover
134:
135: RSA Royal Society of Arts
136:
137: TAFE Technical and Further Education
138:
139: TESOL Teaching English to Speakers of Other Languages
140:
141: UCLES University of Cambridge Local Examinations Syndicate
142:
The National ELT Accreditation Scheme (NEAS) is a self-funding, non-profit, industry-based body operating independently of government and of industry providers, but enjoying close links with Commonwealth and State Government agencies and industry representative bodies. The primary goal of NEAS is the maintenance of high levels of quality in the provision of English Language Teaching (ELT) programs and services by its client institutions in Australia. Accreditation is widely perceived as being of value to the students, the community and Australia's international reputation in the field of English language education. NEAS accredits two broad categories of institution: those institutions in Australia which provide English language intensive courses to overseas students, known by the acronym ELICOS; and providers of Australia's national Adult Migrant English Program (AMEP).

NEAS has been providing ELICOS accreditation services in Australia since 1990 to both public and private sectors. NEAS accreditation is recognised by all Australian Governments and is regarded by State Governments as pre-requisite to mandatory registration for ELICOS. NEAS has been providing AMEP accreditation services on behalf of the AMEP funding authority, the Department of Immigration and Multicultural and Indigenous Affairs (DIMIA), since 1997-98, when the AMEP was opened up to competitive tendering.

The purpose of the scheme is:

* to set standards of quality in the provision of ELT programs and related services in Australia.
to provide a professional judgment as to whether client institutions meet and continue to meet those standards.

* to provide public recognition of compliant institutions.

The NEAS Assessment Panel

At the heart of NEAS processes is a system of peer review of accredited institutions or those seeking accreditation. Reviews are carried out through onsite assessment visits by members of the NEAS Assessment Panel (NAP). They take place at various stages in the accreditation process and on an ongoing basis after accreditation has been gained.

Members of the NAP are acknowledged experts in the ELT field, specifically briefed and trained by NEAS on their role in the accreditation system. They are engaged as needed by NEAS under a separate contract of confidentiality in respect of each institution they assess. Panel members are bound to refuse an engagement if a conflict of interest exists or is likely to exist. Similarly, institutions have the right to refuse a panel member and request a substitute if they have good reason to believe there is a likelihood of conflict of interest.

Benefits of accreditation

NEAS accredited institutions:

* have the right to use the "accredited by NEAS Australia" logo in their promotional activities, recognised worldwide as a mark of quality

* receive frequent informed feedback from the NEAS panel of ELT experts on the quality of their educational programs

* have access to a range of professional education programs for management personnel

* have access to a range of best practice papers on relevant issues.

Additionally, NEAS accredited institutions providing ELICOS programs:

* are committed to a national code of conduct focusing on the best interests of the students and have access to professional guidance on compliance with the code

* are eligible to apply for membership of the peak industry body, English Australia (formerly the ELICOS Association)

* are promoted nationally and internationally on the NEAS web site

* are eligible as candidates for accreditation to apply for
257: registration on the Commonwealth Register of Institutions and Courses
258: for Overseas Students (CRICOS) under the provisions of the
259: Commonwealth’s ESOS Act, enabling them to recruit and enrol overseas
260: students.
261:
262:
263: Students have the security of knowing that, not only has the
264: accredited institution in which they have enrolled met the high
265: quality standards set by NEAS, but also that the institution is
266: subject to ongoing monitoring by the accrediting body of its
267: compliance with those standards.
268:
269:
270: Eligibility for accreditation
271:
272: Only institutions providing ELT programs are eligible to apply for
273: NEAS accreditation. The provision of ELT programs and services must
274: be a discrete part of the institution, if not the sole function of the
275: institution.
276:
277: Institutions applying for accreditation must have had at least one
278: year's operation in Australia as an ELT provider, or, in the case of
279: providers of the Adult Migrant English Program (AMEP), have an
280: existing contract with the AMEP funding authority.
281:
282: Institutions applying for accreditation as an ELICOS provider must
283: have operated ELICOS programs for at least one year as a candidate for
284: NEAS accreditation. Further information is available in the NEAS
285: documents The ELICOS Accreditation Process and Guide to Applying for
286: Candidacy.
287:
288:
289: Assessment for ELICOS accreditation
290:
291: NEAS assesses ELICOS institutions for accreditation by applying the
292: criteria listed under each of the standards in the ELICOS Standards
293: and Criteria. The standards address the following aspects of the
294: institution's ELICOS operations:
295:
296: * Management, finance and administration
297: * Premises
298: * Specialist staff
299: * Student services
300: * Curriculum
301: * Student assessment
302: * Materials and equipment
303: * Recruitment and promotion
304:
305: Institutions must show compliance with all standards for accreditation
306: to be granted.
307:
308: Accreditation is normally granted on the basis of facilities and
309: resources existing at the time of accreditation assessment and within
310: a defined scope. Any future changes to these conditions of
311: accreditation are subject to assessment against the criteria.
Assessment for AMEP accreditation

AMEP providers are assessed for accreditation shortly after finalising their contract with DIMIA. The institution's AMEP programs and services are assessed by applying the criteria listed in the AMEP Standards and Criteria for Accreditation. The standards address the following aspects of the institution's AMEP provision:

- Physical facilities
- Staff
- Educational resources
- Tuition related practices
- Support services
- Program evaluation
- Promotion of the AMEP

Duration of accreditation

Once accredited, institutions retain their accreditation as long as they continue to comply with the accreditation criteria, operate within the conditions of their accreditation, cooperate in ongoing monitoring arrangements, and continue to provide ELT programs.

Ongoing monitoring

The following are the major elements of ongoing monitoring.

- The accredited institution is required to:
  - provide NEAS with an annual return of information relating to the conduct of the educational program over the preceding twelve months
  - cooperate in monitoring visits by a member of the NEAS Assessment Panel, from which feedback is provided to the institution
  - provide prompt advice to NEAS of any changes the institution may make to accredited facilities and personnel
  - (ELICOS only) apply to NEAS before promoting or enrolling students in any new or additional courses, other than those appearing in the institution's Conditions of Accreditation

Ongoing monitoring also includes the investigation of any complaints received by NEAS. The institution complained about is required to cooperate with NEAS in the investigation of the complaint and any recommended follow up action. (See Complaints Procedures)

Automatic withdrawal of accreditation

Accreditation is automatically withdrawn if an institution ceases
providing the ELT programs for which it is accredited, unless the institution has applied to NEAS for voluntary suspension of accreditation before the cessation of courses.

NEAS structure and composition

The National ELT Accreditation Scheme Limited was incorporated in May 1990 as a company with limited liability. Its members are the members of the Council of the industry peak body, English Australia (formerly the ELICOS Association).

The scheme is directed by the NEAS Board and managed by the National Manager. The Board comprises a Chairperson, who is required under the Constitution to be a retired judge or distinguished member of the legal profession, and four other Directors, three of whom are elected by the members and the fourth appointed by the Council of English Australia to represent the EA.

The NEAS Board is responsible for policy review and development, accreditation standards, appeals against decisions of the ELICOS Accreditation Committee, determination of complaints against accredited institutions and any other matters affecting the standing, reputation or viability of NEAS.

Decisions on institutional accreditation for ELICOS are made by the ELICOS Accreditation Committee, consisting of independent members drawn from a panel of informed community members, together with the two members of the NEAS Assessment Panel who visited the institution in question. The Committee is chaired by the National Manager.

Decisions on the grant of initial accreditation to AMEP providers are made by an appropriately constituted Subcommittee of the NEAS Board.

The day-to-day running of the Scheme is the responsibility of the National Manager, supported by a small executive staff. The National Manager reports directly to the Chair of the NEAS Board.

NEAS operational and infrastructure funding is derived from accreditation fees paid by its ELICOS client institutions and from the Australian Government in respect of the Adult Migrant English Program.

NEAS accountants provide an annual audited account to the Directors and members.

NEAS reports quarterly and annually to the Department of Immigration and Multicultural and Indigenous Affairs in respect of the AMEP scheme.
Definitions

English Language Teaching (ELT)

ELT refers to the teaching of English as a Foreign or Second Language, sometimes referred to as Teaching English to Speakers of Other Languages (TESOL). NEAS accreditation is not available in respect of the teaching of English as a mother tongue.

ELT courses may be provided for international students, viz those students who will return to their countries after completion of their studies, or for domestic students, viz those who are permanent residents of Australia.

ELT courses may be provided by institutions in the public or private sectors. NEAS accreditation is available in both sectors. Both are subject to the same accreditation criteria.

English for International Students (EIS)

Students in these programs are in Australia for a defined period, normally limited by the terms of their visa. ELT courses for these students may be part-time or full-time. However, if they are to be offered to overseas students as defined within the terms of the ESOS Act, they must be full-time and must be conducted in compliance with the requirements of the ESOS Act. (See ELICOS below)

Full-time EIS courses (ELICOS)

ELICOS, standing for English Language Intensive Courses for Overseas Students, is the collective term referring to EIS programs which provide for students who are holders of student visas. ELICOS providers are subject to the range of government regulations under the Commonwealth's Education Services for Overseas Students (ESOS) Act 2000 which apply to all providers of education or training services to overseas students. Through the provisions of the ESOS Act, the issuance of student visas is linked to the registration of providers.

Providers of courses to overseas students will only be registered by the Commonwealth if they have met the requirements of the ESOS Act and if they have first been approved for registration by the government of the State or Territory in which the courses are to be provided. In the case of ELICOS, State and Territory governments have agreed that this approval will generally not be given unless the institution has been accepted by NEAS as a candidate for ELICOS accreditation.

Full information on compliance with the ESOS Act and regulations is available in the DEST's Guide for Providers of Education and Training Services to Overseas Students.
ELICOS courses are full-time. Each student must attend the institution for at least 25 hours per week and must be provided with at least 25 hours per week teacher contact. There is no standard length for ELICOS courses.

Full-time EIS courses (non-ELICOS)

The law permits holders of visitor or other short-term visas to be enrolled in full-time EIS courses, but for durations of twelve weeks or less. The provisions of the ESOS Act do not apply to these learners.

Part-time EIS courses

Part-time EIS courses may be offered to holders of visas other than student visas, eg Working Holiday Maker, Visitor. They may be offered in conjunction with a program of cultural or recreational tours or sporting activities. Part-time EIS courses cannot be entered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) and cannot be made available as their principal course to holders of student visas.

English for Domestic Students (EDS)

Courses in English for Domestic Students may be full or part-time. They may be offered by institutions in both the public and the private sectors.

The Adult Migrant English Program (AMEP)

The AMEP is a national program fully funded by the Commonwealth. It is available to migrants assessed as having less than functional English and is provided in all States and Territories by a range of institutions in both public and private sectors. AMEP providers offer the service on behalf of and under contract to the Department of Immigration and Multicultural and Indigenous Affairs (DIMIA).

Accreditation and ongoing quality monitoring by NEAS of AMEP programs and services are included amongst the conditions of contract between AMEP providers and DIMIA.

Non-AMEP

Courses and classes in English for immigrants are available through a wide range of community, private and TAFE colleges. Non-AMEP courses are not at this stage eligible for NEAS accreditation.

The ELICOS Accreditation Process

Initial Eligibility
To be eligible to apply for ELICOS accreditation, institutions must be in the ownership and control of an Australian based company or individual and have been providing ELICOS in Australia for at least twelve months as a candidate for accreditation, or (until December 2001) as provisionally accredited.

A Three-Stage Process

ELICOS accreditation is a three-stage process:

* the Preparatory Stage (pre-operational), during which the institution prepares its business and educational plans;

* the Candidacy Stage, during which the institution, now operating, progressively implements its plans for achieving accreditation compliance (normally twelve months);

* the Accreditation Stage, when, subject to a successful application for accreditation, the institution is fully accredited.

The achievement of candidacy status enables candidate institutions to apply to the relevant State/Territory registration authority for registration on the CRICOS, which, if successful, authorises them to recruit and enrol overseas students immediately.

The institution receives professional guidance from NEAS during the period of candidacy, normally twelve months, and is annually monitored by NEAS for ongoing compliance once it has been fully accredited.

### Stages of Accreditation for ELICOS

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<thead>
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587: Preparation of plans and acquisitions of key resources  
588: NEAS Standards and Criteria (ELICOS)  
589:  
590: Application for candidacy  
591: Guide to Applying for Candidacy  
592:  
593: Form C1: Application for Candidacy  
594: Candidacy achieved  
595: Candidacy stage  
596: CRICOS registration effected  
597:  
598:  
599: Mentoring program  
600:  
601: Workshop attendance  
602:  
603: Accreditation plan implemented  
604:  
605:  
606: Application for accreditation  
607: NEAS Standards and Criteria (ELICOS)  
608:  
609:  
610: Guide to Applying for Accreditation  
611:  
612: Form A1: Application for Accreditation  
613: Accreditation achieved  
614: Accreditation stage  
615: Ongoing compliance  
616: Annual return form  
617:  
618:  
619:  
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623:  
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631:  
632:  
633: The Preparatory Stage  
634:  
635: During the Preparatory Stage, institutions wishing to apply for  
636: candidacy are advised to:  
637:  
638: * become familiar with the ELICOS Standards and Criteria, since these  
639: are the quality levels the institution will be expected to have  
640: reached by the end of the candidacy year;  
641:  
766
642: * achieve a working knowledge of the relevant government regulations and codes of practice for providers of educational services to international students;
645:
646: * develop strategic plans and operational policies reflecting an awareness of the particular needs of overseas students who are learners of English;
649:
650: * acquire certain key resources which are pre-requisite to the grant of candidacy.
652:
653: The detailed requirements for candidacy can be found in Form C1, Application for Candidacy, and the accompanying guide.
655:
656: Upon completion of these preparations, the institution should make application to NEAS for candidacy. The assessment for candidacy includes an onsite visit by a NEAS representative to verify that the key resources required for candidacy are in place.
660:
661: Once accepted by NEAS as a candidate for accreditation, the institution is eligible to apply to the State or Territory registering authority for registration on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) and, if successful, to begin enrolling overseas students. But it is no more than a first step towards accreditation. The achievement of candidacy in no way implies that accreditation will automatically follow.
668:
669: The period of candidacy officially commences on the date of enrolment of the first ELICOS students.
671:
672:
673: The Candidacy Stage
674:
675: * Workshop
676:
677: At an early stage in the period of candidacy, a senior representative of the candidate institution is encouraged to attend a practical workshop aimed at familiarisation with NEAS accreditation standards and the regulatory environment in which ELICOS operates. NEAS will furnish a schedule of workshops held in the institution's region.
680:
681: The workshop also presents the opportunity to raise issues in an informal setting and for self-assessment against the pertinent accreditation criteria.
686:
687:
688: * Mentoring
689:
690: Also during the period of candidacy, the institution receives two separate visits from a member of the NEAS Assessment Panel whom NEAS appoints to the institution as a mentor. In common with all members of the NAP, the mentor will be bound by a contract of confidentiality and will not accept the engagement if there is any possibility of conflict of interest. Similarly, the institution may refuse a particular mentor and request a substitute, subject to advancing a
The role of the mentor is to provide informed guidance to the institution on its progress towards meeting the objectives of its plans in the various areas of accreditation and to assist the institution in identifying any aspects of the operations where improvements could be made. The mentor does not have a role in drawing up, overseeing, or checking the accreditation application on behalf of the institution. This is the institution's own responsibility.

The mentor is not involved in the eventual accreditation decision. Should accreditation be refused or deferred for any reason, the mentor may not be held in any way responsible for the refusal or deferral.

Application for accreditation

Once the institution is satisfied it is in a position to meet the NEAS accreditation criteria (normally one year from the date of enrolment of the first cohort of ELICOS students), it submits its application for accreditation. Application for accreditation must be made on Form A1: Application for Accreditation.

While there is an expectation that institutions will be ready for accreditation assessment after one year's operation as a candidate, there may be instances where more time is needed because of particular circumstances which may not have been foreseen. In these instances, application should be made to NEAS for extension of the candidacy period. Such applications are assessed on their individual merits.

The application for accreditation addresses each of the NEAS quality standards (see ELICOS Standards and Criteria), asking the institution to assess itself against each of the accreditation criteria. The self-assessment is then validated externally by NEAS assessors, two of whom visit the institution to observe its programs and services in full operation.

The accreditation assessment process is described in greater detail in the Guide to Applying for Accreditation which accompanies the accreditation application form.

Accreditation Committee Decision

Following their visit to the institution, the NEAS assessors provide a report to the Accreditation Committee. The report is considered by the Committee alongside the self-assessment and documentation furnished by the applicant.

The Committee may grant, defer or refuse accreditation. In the case of a deferral or refusal, the institution is given full reasons.

Appeals against adverse decisions of the Accreditation Committee may be made to the Board of NEAS. Appeals must be lodged within three weeks of notification of refusal.
The Accreditation Stage

*Conditions of Accreditation*

Institutions, upon accreditation, are issued with a Certificate of Accreditation and a document detailing the conditions of their accreditation. These relate to:

- premises where courses are delivered
- principal administrator
- director of studies
- ELICOS courses to which accreditation relates
- ownership of institution
- maximum number of ELICOS students

Accredited institutions are required to give NEAS prompt advice of any changes to their conditions of accreditation. This should be provided before the change is effected where possible.

Accredited institutions may not vary the scope of their ELICOS operations by the addition of any new course without first applying to NEAS for assessment of the course and inclusion within the conditions of accreditation. Following NEAS assessment of the new course against the pertinent accreditation criteria, the institution should make application to the State/Territory registering authority for variation to the provider's CRICOS entry.

The documents to be submitted to NEAS when applying for variation of conditions of accreditation are:

- Change of premises: copies of documents from the local authority showing consent for building and/or development application; floor plan showing usage and dimensions of all rooms; fire safety certification.
- Change of Principal Administrator: name, curriculum vitae, signed contract of employment, statement of duties and statutory declaration (available from the NEAS office).
- Change of Director of Studies: name, curriculum vitae, certified copies of relevant qualifications, signed contract of employment, statement of duties and statutory declaration (available from the NEAS office).
- Additional Courses: syllabus details as set out in NEAS document, Application for Additional Courses.
- Change of Ownership: company details of new owner; documentary evidence of sale; financial statements of new owner relating to most recent trading year; new owner's written undertaking to comply with accreditation requirements and code of practice.
- Change to maximum number of students: floor plan showing location and dimensions of extra space.
Accredited institutions are required to provide NEAS with an annual return of information relating to the conduct of their educational program over the preceding twelve months. The first of these is due twelve months from the date upon which accreditation was granted. The annual return must be accompanied by an annual fee. (See Fee Schedule)

As a condition of the maintenance of accreditation, accredited institutions are required to cooperate in monitoring visits by a member of the NEAS Assessment Panel from time to time. Notice is given of the visit. The member of the panel will openly discuss any issues which appear to need attention and provide informed advice on matters embraced by accreditation standards and criteria. The panel member reports to NEAS.

Once accredited, institutions retain their accreditation as long as they continue to comply with the accreditation criteria, operate within their conditions of accreditation, cooperate in ongoing monitoring arrangements, and continue to provide ELICOS programs and services.

NEAS investigates complaints lodged against accredited institutions, provided they are related to the accreditation criteria, are submitted in writing and are not anonymous. Although NEAS does not investigate anonymous complaints, the name of the complainant is not necessarily revealed to the institution complained about.

Complaints which are not normally considered by NEAS because they are unrelated to the accreditation criteria include individual grievances from teachers about pay claims and complaints from individual students over refunds, unless it can be shown that the institution provided the student with inadequate or unclear information in handbooks, brochures or other publications.

The first step taken by NEAS in the investigation of a complaint is to advise the Principal of the named institution of the complaint and request a response. Depending on the nature of the complaint, the Principal may be asked to explain the apparent failure of its internal grievance procedures in this instance.
Subject to the seriousness of the complaint and the adequacy of the institution's response, NEAS may order a short notice visit by a NEAS representative, focusing specifically on the substance of the complaint.

If the complaint appears to have some justification and reveals possible breaches of NEAS guidelines, NEAS so advises the institution, informing the Principal of the matters in need of remedial action and nominating a timeframe for completion, or evidence of substantial progress towards completion.

In cases where remedial action proves unsatisfactory, the NEAS National Manager refers the matter to the NEAS Board for its consideration.

The NEAS Board, in its consideration of the matter, may order further investigation, extend the time allowed for remediation, or require the institution to show cause why its accreditation should not be withdrawn.

As a final sanction, the NEAS Board may withdraw accreditation and advise the relevant Government authority of the withdrawal.

Guidelines for Use of NEAS Logo - ELICOS

* The NEAS ELICOS logo is only available for use by institutions which are accredited for ELICOS and participate in the NEAS annual monitoring system.

* The logo is provided as a set of bromides to institutions at the time of the grant of accreditation. Additional copies are available from the NEAS office.

* The logo carries the wording "Accredited by NEAS Australia" and must not be altered or added to in any way when reproduced in promotional literature, information brochures or stationery.

* If you wish to use words to accompany the logo, the appropriate wording is: "[Institution name] is accredited by the National ELT Accreditation Scheme".

* Care should be taken to avoid placing the NEAS logo so as to give the impression that programs are NEAS accredited where this is not the case. For example, holiday programs or study tours offering less than 25 hours per week of supervised study are in general not included in NEAS institutional accreditation. Where such courses are promoted,
there should be a note to the effect that they are not accredited or approved for holders of student visas.

Standards and Criteria

Summary of Standards

SECTION A: MANAGEMENT, FINANCE AND ADMINISTRATION

The institution has an effective management structure designed to further the mission and goals of the institution. The institution is committed to observing ethical practices in staff employment, student administration and financial control.

SECTION B: PREMISES

The institution's premises provide a safe, pleasant learning and teaching environment, appropriately designed and equipped to support the range of teaching programs and student services offered by the institution.

SECTION C: SPECIALIST STAFF

The institution employs specialist staff who are suitably qualified and sensitive to the cultural backgrounds of the students and provides them with appropriate working conditions and inservice professional development opportunities.

SECTION D: STUDENT SERVICES

The institution provides a range of support and pastoral care services tailored to the needs of international students who are at varying stages of English language proficiency development.

SECTION E: CURRICULUM

The institution's curriculum is purposeful, coherent and documented and facilitates the design of teaching programs to meet the needs and requirements of students.

SECTION F: STUDENT ASSESSMENT

The institution's practices and procedures for the assessment of students are appropriate, fair and equitable and operate at all times in the best interests of the students.

SECTION G: MATERIALS AND EQUIPMENT

The institution maintains a stock of material resources which is aimed at enhancing the achievement of course objectives, is adequate for the
1006: number of students and teachers and encourages diversity in learning
1007: activities and teaching methodologies. The materials stock is
1008: appropriately organised and regularly reviewed.
1009:
1010: SECTION H: RECRUITMENT AND PROMOTION
1011:
1012: All action in recruiting students and promoting the institution is
1013: conducted in an ethical and responsible manner. All promotional
1014: material is clear, comprehensive, up to date and accurate and includes
1015: sufficient information about the institution, its programs, services,
1016: resources and facilities to enable prospective students to make an
1017: informed choice.
1018:
1019:
1020: Section A: Management, Finance and Administration
1021:
1022:
1023: Standard
1024:
1025: The institution has an effective management structure designed to
1026: further the mission and goals of the institution. The institution is
1027: committed
1028: to observing ethical practices in staff employment,
1029: student administration and financial control.
1030:
1031:
1032: Compliance Criteria
1033:
1034: 1. Mission
1035:
1036: 1.1 The institution has a written statement of its mission, which
1037: includes its educational philosophy and goals, and which is reflected
1038: in its policies, programs and services, promotional activities and
1039: allocation of resources.
1040:
1041: 1.2 The institution's mission is promulgated to all staff members and
1042: to agents or other persons acting on behalf of the institution.
1043:
1044:
1045: 2. Senior management
1046:
1047: 2.1 Day-to-day management of the institution is in the hands of a
1048: Principal Administrator who has background/experience in an
1049: international education environment, is knowledgeable about and
1050: sensitive to the cultural backgrounds of the students and is committed
1051: to safeguarding their educational interests and welfare. (See Notes
1052: 2.1 to 2.4)
1053:
1054: 2.2 The Principal Administrator has a thorough knowledge of the
1055: institution, its day-to-day management, the implementation of its
1056: policies and its short and long term operations.
1057:
1058: 2.3 The Principal Administrator is familiar with the regulatory
1059: environment in which ELICOS operates, including the respective roles
1060: of the Commonwealth, the State or Territory Government and NEAS, and
1061: ensures s/he remains up to date with changes in the relevant laws, regulations and guidelines as they occur.

1062:

1063: 2.4 The Principal Administrator understands his/her responsibilities to the regulatory agencies, ie DIMIA, DEST, the State/Territory Government registering authority and NEAS, and reports diligently to those agencies as required by their rules from time to time. (See Note 1068: 2.4)

1069:

1070: 3. Staff organisation

1071: 3.1 The administration is structured to ensure that all administrative functions necessary for the achievement of the institution's goals are effectively executed. (See Note 3)

1075:

1076: 3.2 Individuals assigned duties and responsibilities are suitably qualified/equipped to accomplish their duties effectively.

1079:

1080: 4. Employment conditions

1083: 4.1 The institution, as an ethical and responsible employer, ensures that all staff have working conditions appropriate to the duties and responsibilities of the position and consistent with industrial legislation requirements. (See Note 4)

1086:

1088: 4.2 Each staff member, at the time of taking up employment, receives from the institution a signed statement setting out the terms and conditions of employment and a statement of the duties of the position.

1092:

1093: 5. Channels of communication

1095: 5.1 The institution's management incorporates structures and processes for the prompt and efficient dissemination to staff of information pertinent to the execution of their duties, for example changes in migration laws or regulations affecting the institution and its students, changes in internal policies of the institution, changes to NEAS guidelines/criteria.

1102:

1103: 6. Financial management

1105: 6.1 Financial reporting for the institution is in the hands of an appropriately qualified person and is conducted in accordance with accepted accounting standards and practices. (See Note 6)

1109:

1110: 6.2 The institution ensures that it has access at all times to sufficient reserves of funds to meet its financial obligations.

1112:

1113: Section A: Notes
CRITERION 2. SENIOR MANAGEMENT

The Principal Administrator is identified as the person responsible for the day-to-day management of the ELT institution, irrespective of his/her official status within the wider organisation of which it may form part.

The Principal Administrator is in the full-time employ of the organisation which owns or controls the institution.

It should be noted that the person nominated as the Principal Administrator is the one NEAS holds responsible for the institution's compliance with accreditation criteria.

Detailed information about providers' obligations and responsibilities under Commonwealth legislation, notably the Education Services for Overseas Students Act 2000 (the ESOS Act) and Regulations and the DEST booklet, A Guide to Providers of Education and Training to Overseas Students, are available online through the following Internet address:


It should be noted that the National Code (Section 14) includes a requirement that a change of ownership or management be notified to the registering authority within 14 days of the change being made.

The above site includes reference to the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (The National Code), established under the terms of the ESOS Act 2000. The full text of the National Code of Practice is at Appendix A to this document.

CRITERION 3. STAFF ORGANISATION

The following range of responsibilities should be covered in the staffing structure:

* interviewing/recruiting teaching staff
* enrolment of students, including collecting fees
* answering student enquires
* dealing with recruiting agents
* marketing and promotion
* student testing for class placement
* assisting students with accommodation location/placement
* visa information and health insurance
* educational and welfare counselling of students
* staff development activities
* management of student records in accordance with the ESOS Act 2000
* financial administration
Criterion 4. Employment conditions
NEAS does not set down particular working conditions for staff. These should be determined by referring to the relevant industrial legislation in the State/Territory in which the institution is located.

CRITERION 6. FINANCIAL MANAGEMENT
An accountant is considered appropriately qualified if accepted for membership of the Institute of Chartered Accountants or Australian Society of Certified Practising Accountants.

Section B: Premises
The institution's premises provide a safe, pleasant learning and teaching environment, appropriately designed and equipped to support the range of teaching programs and student services offered by the institution.

Compliance Criteria
1. Secure tenure
The institution's ownership has secure tenure of the premises in which English Language Teaching programs are conducted, either as lessee or owner/part-owner. (See Note 1)

2. Health and safety of occupants
All premises used for English Language Teaching programs and services comply with relevant local government regulations including:
- zoning for educational purposes
- building regulations
- fire safety controls
- approved maximum number of occupants.

All areas are adequately lit and suitably ventilated for the number of occupants.
1232: 2.3 Classrooms are insulated against outside noise and/or undue interference from other classrooms.
1235: 2.4 Toilets and washrooms are provided in sufficient number to meet local government regulations and are kept in a clean and hygienic condition.
1239: 2.5 Buildings and outside areas are maintained in a safe and hygienic condition.
1242: 2.6 Buildings are clearly identified on the outside by signage readily understandable by students.
1245: 3. Designated areas
1248: 3.1 The premises include areas designated for:
1250: * classroom teaching
1252: * teacher studies/staffrooms
1253: * student recreation
1254: * confidential counselling
1255: * offices
1256: * storage.
1257: 3.2 Where other facilities and services are offered by the institution, eg self-access or private study, library, resource centre, language laboratory, the premises include areas specifically designated for these purposes.
1262: 4. Classrooms and other study areas
1265: 4.1 Classrooms are large enough to accommodate the number of students and teachers occupying them, in accordance with the appropriate standard. (See Note 4)
1269: 4.2 Classrooms are fitted with power points, writing boards and teacher and student furniture suitable for language teaching activities.
1273: 4.3 Additional study areas - eg self-access, resource centre, private study, language laboratory - are sized, fitted out, furnished and equipped in accordance with the part they play in the educational program.
1278: 5. Teacher studies/staffrooms
1281: 5.1 Teacher studies/staffrooms are large enough to accommodate one desk or workspace for each equivalent full time teacher when at maximum capacity.
1285: 5.2 Teacher studies/staffrooms have enough desks/workspaces for
1287: the number of teachers using them at any time, a secure place for each
1288: teacher's personal belongings, storage for teaching materials and
1289: access to tea-making facilities.
1290:
1291:
1292: 6. Student common areas
1293:
1294: 6.1 Student common areas are adequate for the size of the
1295: enrolment, taking into account the availability of any complementary
1296: facilities close by, and are fitted out and furnished in accordance
1297: with their function. (See Note 6)
1298:
1299: 6.2 There is appropriate provision for the display of notices and
1300: general information for students.
1301:
1302:
1303: 7. Offices
1304:
1305: 7.1 Office space is sufficient to accommodate the number of
1306: management, administrative, clerical and other ancillary staff
1307: employed by the institution and is fitted out and furnished in
1308: accordance with its use.
1309:
1310: 7.2 The Director of Studies is provided with a separate office,
1311: suitable for private interviews.
1312:
1313: 7.3 There is an office suitable for confidential counselling of
1314: students.
1315:
1316:
1317: 8. Storage
1318:
1319: 8.1 Adequate provision is made for the safe storage of teaching
1320: equipment and general stores.
1321:
1322:
1323: Section B: Notes
1324:
1325:
1326: CRITERION 1. SECURE TENURE
1327:
1328: Section 17 of the National Code includes a requirement that the
1329: relevant authorities should be notified of the intention to relocate
1330: premises at least three weeks before the move is effected.
1331:
1332: CRITERION 4. CLASSROOM SIZE
1333:
1334: The Building Code of Australia sets down a standard for classrooms of
1335: two square metres per occupant. NEAS will apply this standard to all
1336: institutions which apply for accreditation of premises from 1 July
1337: 2001. The previously existing standard of 1.6 square metres per
1338: student will continue to apply to classrooms accredited prior to 1
1339: July 2001 as long as the currently accredited provider is occupying
CRITERION 6. STUDENT COMMON AREAS

The premises should include rooms or areas for student recreation, where students can relax during breaks, take refreshments, meet informally and so on. The size of the area and the facilities offered will differ according to such factors as the size of the student body and the ELICOS institution's proximity to suitable food outlets, takeaways, etc. It should never be necessary for students to eat their lunch in the classroom.

Section C: Specialist Staff

Standard

The institution employs specialist staff who are suitably qualified and sensitive to the cultural backgrounds of the students and provides them with appropriate working conditions and inservice professional development opportunities.

Compliance Criteria

1. Director of Studies

1.1 Academic management is in the hands of a Director of Studies, who is in the full-time employ of the institution. (See Note 1.1)

1.2 The Director of Studies is an experienced TESOL professional with recognised postgraduate qualifications in TESOL. (See Note 1.2)

1.3 The Director of Studies is committed to achieving the institution's educational goals through the development, implementation and review of the curriculum, the management of the educational resources and the provision of guidance to the teaching staff.

1.4 The Director of Studies maintains an up to date knowledge of significant developments in TESOL theory and practice.

2. Teachers
2.1 Teachers in ELT programs are trained/experienced professional teachers and hold specialist TESOL qualifications. (See Notes 2.1 to 2.8)

2.2 Where the institution offers courses of preparation for entry to Australian secondary schools, at least 50% of instruction on these courses is provided by TESOL teachers who received their pre-service training in the Australian secondary system, or who have at least 800 hours experience in teaching in Australian secondary schools.

2.3 The institution verifies the qualifications of all teachers employed to teach on ELT programs.

2.4 Each teacher, at the time of taking up appointment, receives in writing from the institution a signed statement containing a job description and the terms and conditions of employment. (See Note 2.9)

2.5 The institution ensures that teachers' working conditions and rates of pay compare favourably with similar teaching systems, to promote equitable and harmonious employment arrangements which enhance the quality of education offered. (See Note 2.10)

3. Teacher professional development

3.1 The institution provides for the ongoing professional development of teaching staff, to ensure teachers are kept up to date with current knowledge, theory and practice in the field. (See Note 3)

3.2 The institution has an effective policy and procedures for the induction of new teachers.

3.3 Teachers receive ongoing guidance and support from the Director of Studies on course design and lesson planning, with particular attention to the less experienced teachers.

4. Counselling staff

4.1 The institution employs at least one person equipped to provide counselling to students on further education avenues and opportunities. (See Note 4)

4.2 The institution employs in the role of welfare counsellor a person who has formal qualifications in counselling and/or relevant experience in advising students in an intercultural context.

4.3 In appointing a person to the counsellor role, care is taken to avoid the potential for conflicts of interest and to ensure that students' cultural and gender sensitivities are respected.
SECTION C: NOTES

CRITERION 1. DIRECTOR OF STUDIES

1.1. Where, for good reasons, it is not possible for the Director of Studies to be employed full-time, another staff member should be identified as available and willing to carry out the responsibilities of the DoS as an on site manager in his/her absence. This person should satisfy the minimum qualifications for a Director of Studies and should be aware of the responsibilities of the position.

1.2. The following is a minimum acceptable position for the qualifications of Director of Studies:

- Recognised degree and/or formal teaching qualifications plus
- Postgraduate qualification in TESOL (see note below)

Note: For the purposes of this criterion, a Diploma in Education (Dip Ed) with TESOL specialisation is regarded as a postgraduate qualification.

CRITERION 2. TEACHERS

2.1. The following is a minimum acceptable position for the qualifications of teachers:

- A recognised pre-service teaching qualification (see Note 2.4)
- An appropriate TESOL qualification (see Note 2.5)
- OR
- A recognised degree or diploma (see Note 2.6)

- plus

Note: For the purposes of this criterion, a Diploma in Education (Dip Ed) with TESOL specialisation is regarded as a postgraduate qualification.
at least 800 hours classroom teaching experience (See Notes 2.7 and 2.8)

plus

an appropriate TESOL qualification (See Note 2.5)

The detailed information necessary for assessing qualifications and/or experience of applicant teachers can normally be found in course transcripts from universities and statements of service from previous employers.

There may be isolated cases where the pattern of qualifications does not match those outlined here, but where either the teacher or the institution believes special consideration should be given on the basis of equivalence. Employers are urged to give these cases full consideration. If requested, NEAS may be able to give a second opinion, provided full documentation is available.

"A recognised pre-service teaching qualification" is a formal teacher training qualification awarded by an Australian University or College of Advanced Education or its overseas equivalent. It may be:

- Diploma of Teaching
- Bachelor of Education
- Bachelor degree and Diploma in Education
- Bachelor degree and Diploma in Educational Studies (TESOL)
- Bachelor degree and two-year Teaching Certificate

provided

the combined course of study is at least three years full-time (or its part-time equivalent) in length and is recognised in its country of origin as conferring "trained teacher" status.

Courses in this category may be award courses at Master, Bachelor, Graduate Diploma or Graduate Certificate level. They may also be non-award courses, provided they have been accredited by an appropriate authority. The appropriate authorities accepted by NEAS for this purpose include the various Australian State/Territory

Section C: Notes (continued)
1576: recognition authorities for vocational education and training.

1577:

1578: In the past, some TESOL courses at Graduate Diploma or Master level
1579: did not include supervised and assessed practice teaching in the
1580: practical component. Qualifications from such courses undertaken
1581: before 1993, when this policy was introduced, may be found acceptable
1582: as TESOL qualifications, provided they satisfy (I) and (III) above.
1583:

1584: 2.6. "A recognised degree or diploma" is one that is at least three
1585: years full-time (or its part-time equivalent) and is recognised as
1586: such in Australia.
1587:

1588: 2.7 Classroom teaching experience" should have taken place in
1589: recognised institutions, such as registered schools (government or
1590: non-government), TAFE colleges, AMEP providers, registered business or
1591: commercial colleges, accredited ELICOS institutions, universities, or
1592: equivalent overseas institutions.
1593:

1594: 2.8 Institutions may employ teaching staff who have a recognised
1595: degree and an appropriate TESOL qualification, but who do not have
1596: either a recognised teaching qualification or 800 hours classroom
1597: teaching experience, as long as there is written evidence that the
1598: individual teacher has demonstrated outstanding competence in TESOL.
1599: Such evidence may include:
1600: * a higher than pass grade in their TESOL qualification;
1601: * documents furnished by previous employers;
1602: * references from TESOL course directors.
1604:
1605: This evidence must be retained by the institution.
1606:
1607: At no time may an institution have more than 20% of its teaching staff
1608: employed under the provisions described in Note 2.8.
1609:
1610: 2.9 When drawing up contracts or letters of employment for
1611: Director of Studies and teachers, it is advisable to make explicit the
1612: arrangements relating to the ownership of any curriculum and/or
1613: instructional materials created or developed by the employee while in
1614: the employ of the institution.
1615:
1616:

Section C: Notes (continued)
1617:
1618:
1619:
1620:
1621: 2.10 Information about employment conditions for teachers in
1622: private sector institutions may be obtained from the Independent
1623: Education Union of Australia.
1624:
1625:
1626: CRITERION 3. TEACHER PROFESSIONAL DEVELOPMENT
1627:
1628: Institutions could be expected to have staff development policies and
1629: programs which include at least the following:
1630:
* a program of regular seminars or workshops conducted in house or in conjunction with another institution, each one focusing on an area of interest, e.g., methodology, materials, activities, ideas and insights gained from professional reading;

* assistance with attendance at relevant conferences;

* encouragement to pursue further qualifications;

* a library of up to date teacher references, including journals, which is accessible to teachers.

Criterion 4. Counselling

If the institution appoints a teacher to the role of counsellor, care should be taken to reduce the teaching load accordingly.

Section D: Student Services

Standard

The institution provides a range of support and pastoral care services tailored to the needs of international students who are at varying stages of English language proficiency development.

Compliance Criteria

1. Information and orientation

1.1 Students are provided on arrival with a program of orientation to the institution and local community, designed so as to be readily understood by them, including advice on health and safety matters, attendance obligations, accommodation, counselling and grievance resolution procedures.

1.2 Students are made aware of their obligation to keep the institution advised of changes to contact details. (See Note 1.2)

1.3 Orientation information is made available to students as a handbook or manual for ongoing reference.

2. Grievance resolution

2.1 The institution has a policy and procedures for the prompt and fair hearing of student difficulties or grievances, incorporating contact details of an appropriate outside agency to which students may have independent recourse in the case of unresolved grievances. (See Note 2.1)
2.2 Students are made aware of the policy and procedures for the resolution of student grievances in a way that can be readily understood by them.

2.3 The procedures for the resolution of student grievances are clearly visible in written and/or graphic form on the premises.

3. Counselling and welfare

3.1 Students have ready access to a welfare counselling service which is sensitive to cross cultural issues, respectful of age and gender sensitivities and able to cross language barriers.

3.2 Students are provided with advice and counsel on their academic progress and further education opportunities.

3.3 Support mechanisms are available for students experiencing difficulties with course work.

4. Accommodation

4.1 The institution provides an accommodation service to assist students in finding suitable accommodation.

4.2 A nominated member of the institution's staff is responsible for monitoring student satisfaction with accommodation arrangements and for ensuring the suitability of homestay accommodation and host families.

5. Accommodation for students under 18

5.1 The institution satisfies itself that each enrolled student under the age of 18 is in a fully supervised accommodation arrangement for the duration of the course. (See Note 5.1)

5.2 The institution provides homestay arrangements for students under 18 whose parents/guardians have not arranged accommodation independently and has an appropriate and documented policy covering the provision of such homestay. (See Notes 5.2 to 5.6)

6. Social and recreational activities

6.1 The institution offers a range of social and recreational activities suited to the age of the students and sensitive to their cultural backgrounds.
1741: 7.1 Students are informed of their obligation to attend the course for
1742: 25 hours per week and the possible consequences of unsatisfactory
1743: attendance. (See Note 7.1)
1744:
1745: 7.2 Student attendance is checked conscientiously and recorded
1746: systematically for all study periods. (See Note 7.2)
1747:
1748: 7.3 Attendance records are monitored fortnightly and poor attenders
1749: are routinely counselled. (See Note 7.3)
1750:
1751:
1752:
1753:
1754:
1755: Section D: Notes
1756:
1757:
1758:
1759: CRITERION 1. INFORMATION AND ORIENTATION
1760:
1761: 1.2 Students must be advised in writing of their obligation to notify
1762: the institution of any change to their contact details, as stated in
1763: Section 41 of the National Code.
1764:
1765:
1766: Criterion 2. Grievance resolution
1767:
1768: 2.1 Section 45 of the National Code requires that students be given
1769: the right to be
1770: represented by a nominee if the student so chooses. Students should
1771: be advised of this in student information.
1772:
1773:
1774: CRITERION 5. ACCOMMODATION FOR STUDENTS UNDER 18
1775:
1776: 5.1 Students under 18 may be accompanied by their parents or
1777: guardians, or their parents or guardians may have made arrangements,
1778: quite separately from the institution, for their accommodation with
1779: relatives or friends in Australia. As it is in the interest of all
1780: parties for the institution to be aware of these arrangements, or any
1781: changes to them during the course, the institution should have
1782: established procedures for acquiring the relevant information in
1783: writing from the parents or guardians before the course commences.
1784:
1785: 5.2 Unaccompanied students are those students under 18 whose
1786: parents or guardians have not arranged accommodation independently.
1787: The institution should have homestay arrangements in place to cater
1788: for these students.
1789:
1790: 5.3 The institution's policy covering homestay arrangement for
1791: unaccompanied students must include at least the following:
1792:
1793: * guidelines and criteria for the selection of the host family and the
1794: type of accommodation
1795: * an orientation program for members of approved first-time families
5.4 The criteria for selection of homestay families must include at least the following:

- Stability of the arrangement
- Suitability of the family and accommodation for the age and sex of the student
- Provision of leisure time activities suited to the age and sex of the student
- Appropriate arrangements for the supervision of the student by the host family
- Limits on the number of students accommodated in one home.

Section D: Notes (continued)

5.5 The institution is expected to seek regular and frequent feedback from homestay hosts on student progress and welfare and makes regular onsite checks.

5.6 A copy of the institution's homestay policy must be made available to the parent(s) of the student before enrolment is confirmed.

Criterion 7. Student attendance obligations

7.1 ELICOS students are required by government regulation to attend the course for 25 hours per week. They must have a record of at least 80% attendance over the course to be allowed to extend their visa. The attendance certificate issued to students at the end of the course must clearly show the percentage attendance over the course and must be endorsed as Satisfactory or Unsatisfactory.

7.2 Excessive absences or failure to attend on the part of ELICOS students must be reported in writing to the Department of Immigration and Multicultural and Indigenous Affairs.

7.3 Details of the institution's obligations in respect of attendance monitoring and reporting procedures are contained in Section 39 of the National Code.
The institution's curriculum is purposeful, coherent and documented and facilitates the design of teaching programs to meet the needs and requirements of students.

Compliance criteria

1. Courses and timetables

1.1 All ELT courses in which overseas students are enrolled as their primary course are accredited by NEAS and provide students with 25 hours per week of professionally supervised instruction. (See Note 1.1)

1.2 Teaching timetables reflect the needs of the course and place priority on the achievement of the students' educational goals. (See Note 1.2)

1.3 All professionally supervised instruction is provided by a qualified TESOL teacher. (See Note 1.3)

1.4 Of the 25 hours per week supervised instruction, no less than 20 are face-to-face teaching, with an average of 15 students per teacher per class, and with no more than 18 students in any one class at any one time.

1.5 Of the 25 hours per week supervised instruction, no more than five are timetabled for non-face-to-face teaching-learning activities, during which the number of students per teacher varies according to the nature of the activity.

2. Curriculum design

2.1 For each course there is a set of specific objectives based on the assumed needs of the learners and described in terms of learner outcomes.

2.2 The institution assesses students' achievement on a course through the use of assessment instruments which have been developed to reflect the specific objectives of the course.

2.3 Course content is selected on the basis of its appropriateness in supporting the achievement of course and lesson objectives.

2.4 The design of special purpose courses is informed by research into the relevant content areas (e.g., in English for High School Preparation, the curriculum and typical educational environment of the particular secondary system).

2.5 All timetabled learning activities, including computerised instruction, out-of-class learning and self-study, have a clearly stated educational purpose which is intended to further the objectives of the course and which is made clear to all students.
2.6 A varied range of teaching methods and learning activities is provided to cater for the diverse learning styles of the students. (See Note 2.5)

2.7 Teaching methods, materials and learning activities take advantage of the English language environment of the ELICOS institution.

3. Curriculum documentation

3.1 The curriculum for each accredited course is documented in sufficient detail to enable teachers to plan teaching programs to meet the needs of each cohort of students.

3.2 Written records of what has been taught are retained for purposes of syllabus review and modification, program coordination and accountability.

4. Review and evaluation

4.1 All courses are kept under active review and modified as needed, taking into account current professional developments, changes in student profiles, the views of teachers and feedback from students and other interested persons.

4.2 Each course is subject to end-of-course evaluation, the results of which inform the conduct of future courses.

Section E: Notes

1.1 Overseas Students are defined as those students who are holders of valid student visas.

1.2 Courses should be named in a way that accurately reflects the content and objectives. The indicative English Language proficiency level may be expressed as one level (eg Advanced), or a range of levels (eg Elementary to Advanced).

1.3 Courses which are intended for CRICOS entry (ie available to holders of student visas) must be identified by name and this name must be consistently used throughout course documentation and promotional literature.

1.4 Double-shift and staggered start timetables should not be provided simply for the purpose of enabling students to give top
1961: priority to paid work or other activities unrelated to their studies.
1962: Holders of student visas are obliged by the terms of their visas to give top priority to their studies, with work as incidental.
1964:
1965: If double shift timetables are used, the following should be observed:
1966:
1967: * There should be no more than two consecutive shifts each day.
1968:
1969: * Both sessions should include equivalent teaching and support staff including counselling services.
1970:
1971: * There must be a total of 60 minutes break time within each five hours of teaching.
1972: * Classes should not be held after 8.30 pm.
1973:
1974:
1975: Under the terms of the National Code (Section 13.13) use of premises for tuition purposes should not exceed 14 hours per day.
1976:
1977: * Professionally qualified staff must be present while premises are open for the use of students outside the mandatory 25 hours of instruction each week.
1978:
1979: For details on the qualifications of teachers, refer to Section C: Specialist Staff.
1980:
1981:
1982: Criterion 2. Curriculum design
1983:
1984: In the case of courses including work placement, under the terms of the National Code of Practice (Section 13.3), "The registration [of a course on CRICOS] ... must not include any period of work-based training unless this is necessary in order to obtain the course qualification".
1985:
1986: For such courses to be accredited, the work placement must be integrated into the syllabus as a language learning component. The general guidelines for courses including work placement are as follows:
1987:
1988: * English language learning aims and objectives of the work placement component are clearly specified.
1989:
1990: * There is language preparation prior to and debriefing following the placement.
1991:
1992: * The placement is professionally supervised.
1993:
1994: * The placement is assessed as part of the course assessment.
2024: * The placement takes up no more than 20% of tuition time.
2025:
2026: * The institution arranging the placement takes responsibility for the
2027: student's safety and welfare during the work placement component.
2028:
2029:
2030: Section F: Student Assessment
2031:
2032:
2033: Standard
2034:
2035: The institution's practices and procedures for the assessment of
2036: students
2037: are appropriate, fair and equitable and operate at all times in
2038: the best interests of the students.
2039:
2040:
2041: Compliance criteria
2042:
2043: 1. Pre-course entry assessment
2044:
2045: 1.1 The institution has procedures for assessing the capacity of
2046: an applicant student to undertake an English language course. (See
2047: Note 1)
2048:
2049: 1.2 The institution takes all reasonable steps to ensure that agents
2050: who may be engaged to conduct pre-course assessments on its behalf are
2051: adequately informed and equipped to carry out the task competently.
2052:
2053:
2054: 2. Placement assessment
2055:
2056: 2.1 The institution has developed appropriate procedures for placing
2057: students in classes after arrival in Australia, taking into account
2058: their English language level, maturity and the objectives of the
2059: course. (See Note 2)
2060:
2061: 2.2 The institution has procedures for correcting incorrect placements
2062: and students are advised of them.
2063:
2064:
2065: 3. Formative assessment
2066:
2067: 3.1 The institution has effective methods, procedures and
2068: instruments for monitoring students' progress which reflect course
2069: content and modes of delivery.
2070:
2071: 3.2 Records of individual students' progress are maintained.
2072:
2073: 3.3 Students are kept informed of their assessed progress.
2074:
2075:
2076: 4. Summative assessment
2077:
2078: 4.1 The institution issues a document to each student at course
2079:
end, indicating the dates, duration, level of course, and grades or levels of achievement. (See Note 4)

The institution ensures there is consistency between the grades or levels awarded and the assessment methodology.

The end-of-course document includes, or is accompanied by, an explanation of the terms used in awarding grades or levels, expressed in language meaningful to the wider community.

4.3 The end-of-course document includes, or is accompanied by, an explanation of the terms used in awarding grades or levels, expressed in language meaningful to the wider community.

5. Assessment review

5.1 The institution has a policy and procedures for the regular review and modification of its student assessment and reporting procedures.

Section F: Notes

CRITERION 1. PRE-COURSE ENTRY ASSESSMENT

Course applicants should produce evidence of sufficient education to cope with a course in English as a Second Language. This should be a minimum of four years' secondary schooling or its equivalent, which is accepted as evidence of literacy in the mother tongue.

Assessments at the pre-course stage may be made by interview, by self-assessment, by standard or non-standard test, or by requiring a certain period of prior English language study.

All applicants for ELICOS must be over 18 years of age at the commencement of the course. An exception is made where parents/guardians have certified in a declaration on the Confirmation of Enrolment that they have assessed, and are satisfied with, the welfare and support services and arrangements offered by the institution and the institution has specific approval under any relevant State/Territory legislation to offer courses to students under 18 years.

CRITERION 2. PLACEMENT ASSESSMENT

Assessment instruments and procedures for placing students in class after arrival may be developed in house or acquired commercially.

CRITERION 4. SUMMATIVE ASSESSMENT

SUMMATIVE ASSESSMENT
Institutions should retain documentary evidence to support any claims that a certificate is accepted at another institution as the equivalent of part of another course, or that it fulfils a pre-entry requirement to another course.

Section G: Materials and Equipment

Standard

The institution maintains a stock of material resources which is aimed at enhancing the achievement of course objectives, is adequate for the number of students and teachers and encourages diversity in learning activities and teaching methodologies. The materials stock is appropriately organised and regularly reviewed.

Compliance Criteria

1. Teaching-learning materials

1.1 A stock of teaching-learning materials is maintained in adequate supply for the number of students enrolled and appropriate to the level and type of courses offered.

1.2 Teaching-learning materials cover a range of media, allowing for variety in learning activities and teaching methodologies.

1.3 The stock of teaching-learning materials is regularly reviewed, replenished and updated in accordance with changes in course offerings and student profiles and in the light of new developments in TESOL theory and practice.

1.4 Where a program of student self-access or self-study is offered, materials are selected, grouped and packaged so as to be fit for their purpose and adequate for the number of students using the program, taking into account differing rates of progress and learning styles.

1.5 The stock of teaching-learning materials includes materials developed by teachers for classroom and individual student use.

1.6 Materials are stored, packaged and/or coded to optimise use and access.

2. Teacher reference materials

2.1 There is a reference library of books, journals, and other publications for teachers reflecting contemporary knowledge of the theory and practice of TESOL.
2.2 Teachers are encouraged to make use of the reference library for course and lesson planning and their own professional development.

3. Teaching-learning equipment
3.1 The institution provides access on the premises to a range of educational technology that supports its teaching-learning programs and provides scope for diverse teaching methodologies.
3.2 Electronic hardware for classroom use, e.g. audio and video players and TV monitors, are sufficient in number and appropriate in type to meet the needs of the teaching program.
3.3 Students have access to high quality audioactive equipment for individual use.
3.4 Facilities for duplicating are available on the premises for the use of students and teachers.
3.5 Equipment for the use of students in self-study areas, such as self-access centres, resource centres, computer and language laboratories, is organised so as to facilitate access and use by individual students.
3.6 Teaching-learning equipment is maintained in good working order.

4. Copyright
4.1 The institution has documented policies governing the acquisition and use of materials, software and intellectual property which are in accordance with Australia's copyright laws. (See Note 4)
4.2 Policies and procedures relating to the use of material subject to copyright are promulgated to all staff.

Section G: Notes

CRITERION 4. USE OF COPYRIGHT MATERIAL

Course materials may include items that are copied from printed, audio-visual or online sources. Copying materials from any of these sources will often involve reproducing items protected by copyright. A number of licences are available which permit institutions to reproduce copyright material for educational purposes lawfully. All institutions must obtain the relevant licences before any copying of
copyright material is undertaken.

Information about licences can be obtained by contacting the following organisations:

For television programs (including cable and satellite) and radio broadcasts, contact:

Screenrights
P O Box 1248
Neutral Bay NSW 2089
Tel (02) 9904 0133
Fax (02) 9904 0498
Email: licensing@screen.org
www.screen.org

For performance of music and/or printed music, contact:

APRA/AMCOS
Locked Bag 3456
St Leonards NSW 2065
Tel (02) 9935 7900
Fax (02) 9935 7999
www.apra.com.au
www.amcos.com.au

For printed material from books, publications and from online sources, contact:

Copyright Agency Limited (CAL)
Level 19, 157 Liverpool Street
Sydney NSW 2000
Tel (02) 9394 7600
Fax (02) 9394 7601
Email: licence@copyright.com.au
www.copyright.com.au

Section H: Recruitment and Promotion

All action in recruiting students and promoting the institution is conducted in an ethical and responsible manner. All promotional material is comprehensive, up to date and accurate and includes sufficient information about the institution, its programs, services, resources and facilities to enable prospective students to make an informed choice.
1. Recruiting

1.1 The institution ensures that it has informed itself on the probity and ethical standards of any recruiting agents with whom it has agreements.

1.2 The institution takes steps to ensure its agents are adequately informed about the regulations and guidelines relevant to students and providers of English language teaching programs.

1.3 The institution assumes responsibility for monitoring its recruiting agents and makes every reasonable effort to ensure that its agents act at all times in the best interests of the student and the institution.

2. Promoting the institution and its facilities

2.1 Care is taken to ensure that text and visuals used in promotional materials are an accurate reflection of the institution, its location, resources and facilities.

2.2 The name of the accrediting agency is unambiguously stated. (See Note 2)

2.3 Any reference in promotional material to the profile and qualifications of teaching staff is an accurate reflection of the existing situation.

2.4 Any references to support facilities such as language and computer laboratories, resource centres and libraries are accurate.

3. Pre-enrolment promotion of courses

3.1 Course descriptions in pre-enrolment information include a general description of course content, teaching materials, teaching methods and assessment methods used.

3.2 Course names, lengths, levels and hours of tuition are stated accurately and consistently throughout the promotional literature.

3.3 Course descriptions clearly distinguish between courses which are registered and available to holders of student visas and any non-registered courses which are not available to holders of student visas as their principal course. (See Note 3)

3.4 Any claims that courses meet the entry requirements of another institution or are accepted for equivalence by another institution are made with the written agreement of that institution.
4. Providing pre-course information about fees, charges and likely costs

4.1 All course fees and charges are clearly and accurately stated in promotional materials and pre-course information for students.

4.2 Prospective students are provided with information about other likely costs associated with the course of study, including the cost of any compulsory text books, uniforms, residential accommodation and cost of living in Australia.

4.3 Prospective students are provided with accurate information about the Australian Government's regulation concerning Overseas Student Health Cover. (See Note 4)

5. Refund and Cancellation policy

5.1 The institution's refund policy and conditions of enrolment are clearly visible on the form of application for enrolment, together with a space for the signature of the student (or parent/guardian where the student is under 18) as evidence that they have understood and accepted the entry and refund conditions.

5.2 The institution's published refund policy clearly identifies any compulsory fees which are non-refundable, and any amounts to be refunded in the event of cancellation by either party. (See Note 5.)

6. Providing pre-course information about welfare, support, recreational services and the local environment

6.1 Prospective students are provided with accurate information on the local area, the types of residential accommodation available to students on and off campus and the kinds of assistance provided by the institution in finding accommodation.

6.2 All references in pre-course information to welfare, counselling and social/recreational programs offered to students are accurate.

7. Providing pre-course information about admission procedures

7.1 Pre-enrolment information clearly sets out procedures for seeking enrolment, paying fees and applying for a student visa. (See Note 7)

7.2 Any specific admission requirements in terms of English language proficiency, prior study, qualifications or experience, are clearly indicated in pre-enrolment information.
Avoiding misleading, ambiguous, or exaggerated claims in promotional materials.

Care is taken to avoid inaccurate or misleading photographs, or exaggerated claims on such matters as likely progress and levels of attainment, recognition of certificates and awards, further study opportunities, qualifications of teaching staff.

Care is taken to avoid any statement implying that the institution is approved or accredited by the Australian Government.

A nominated officer of the institution is responsible for ensuring all promotional material and pre-course information for students is accurate, comprehensive, up to date and clear.

Section H: Notes

Criterion 2. Promoting the institution and its facilities

The agency providing ELT institutional accreditation in Australia is the National ELT Accreditation Scheme (NEAS).

Although ELICOS providers must be registered by the Department of Education, Science and Training, the Australian Government specifically disallows advertising by any provider stating or implying that the provider is approved or accredited by the Australian Government, or that the Australian Government will guarantee the provider's debts to students, or that the quality of a provider's services is guaranteed by the Australian Government. For more information, see the DEST website.

Criterion 3. Promoting the Courses

Institutions may, at their discretion, offer part-time courses, study tours, or other short-term package arrangements, including an ELT component (which may be NEAS accredited). These are outside the definition of ELICOS and are not available as their main course to holders of student visas.

Criterion 4. Providing pre-course information about fees, charges and likely costs

Holders of student visas are required by regulation to have health insurance. The Overseas Student Health Cover (OSHC) arranged by Medibank Private is considered by the Australian Government to meet this requirement. Providers of ELICOS must ensure that OSHC is arranged for students coming to Australia and that cover is paid and effective from their date of arrival in Australia.
CRITERION 5. REFUND AND CANCELLATION POLICY

The following is the minimum acceptable position for a refund and cancellation policy:

* The institution's published refund policy clearly identifies any compulsory fees which are non-refundable.

* The institution's published refund policy makes clear the amount of prepaid fees (if any) to be refunded if the student cancels before the course begins.

* The institution's published refund policy makes clear the amount of prepaid fees (if any) to be refunded if the student cancels after the course begins.

* The institution's published refund policy makes it clear when and how the student should apply for a refund.

Under the terms of the National Code the refund policy "must include the statement that 'This agreement does not remove the right to take further action under Australia's consumer protection laws". It must also make clear that "the registered provider's dispute resolution processes do not circumscribe the student's right to pursue other legal remedies". For details refer to the National Code, Sections 43-44 and Sections 27-32 of the ESOS Act 2000.

Criterion 7. Providing pre-course information about admission procedures.

It is a requirement under the National Code and the ESOS Act 2000 that students be made aware that personal information may be made available by the provider to Commonwealth and State agencies and the ESOS Assurance Fund Manager (Section 51 of the National Code).
Dear

I am writing to you as Director of Studies at an ELICOS centre which I hope will become involved in a research project focusing on the role of the teacher in the ELICOS industry.

This project is part of my studies towards a M.A. (Hons) in Linguistics at Macquarie University, where I am being supervised by Professor C.N. Candlin of the Department of Linguistics and NCELTR.

At this stage in the M.A. (Hons) I am interested in looking at teachers' perceptions of the factors which shape their professional roles. I am particularly focusing on situations in which teachers perceive difficulty in reconciling their pedagogical obligations with the commercial needs of the college.

I would like to involve some teachers at your centre in this project. Your consent will enable me to collect the data I need to pursue my research. I will be asking participating teachers to keep a diary of their professional experience for one month. The diary will be followed up by an interview.

All participants will be provided with details of the project and its aims.

The proceedings will be conducted confidentially and the anonymity of participants and institutions is assured. As the research nears completion, I will keep those involved in the study informed of the findings. The research is subject to the guidelines of the University's Ethics Committee.

I anticipate that this research will make a contribution to the professional development of participating teachers as well as informing the training of teachers in the future.

I hope you will consent to having some of the teachers in your centre become involved in this project. If so, please sign the attached informed consent forms and return the researcher's copy to me at the contact address. If you have any questions about the project, I can be contacted at the number provided on the consent form. In any case, I will get in touch with you early next week as we arranged.

Kind regards

Jonathan Crichton
Research Associate
APPENDIX 10: CONSENT FORMS (TEACHER AND INSTITUTIONAL)

Informed Consent Form (Teachers) - Participant's copy

This document is a consent form for participants involved in research into the role of the ELICOS teacher. Information about the project, its aims and procedures, is provided below. Please read the form carefully before signing your consent.

The area being studied
The area of study is the role of the ELICOS teacher.

The aims of the study
The investigation aims to provide insight into the ELICOS teacher's role as it is shaped within the professional lives of practising teachers. It is anticipated that the study will make a valuable contribution to the professional development of participating teachers as well as informing the training of teachers in the future.

The people responsible for the project
Principal investigator: Jonathan Crichton: the research is being carried out as part of the requirements of an M.A. (Hons) in Linguistics at Macquarie University.

Contact information:
22 Urunga St
North Balgowlah
NSW 2093
Tel/fax: 9949 7395

Supervisor: Professor C. N. Candlin, Department of Linguistics, Macquarie University. Tel. 9850 8740

Procedures
The data to be gathered for the study comprise diaries kept by a sample of ELICOS teachers for a period of one month. The diarists will record situations which they consider to play a significant part in shaping their role as teachers. The data will also comprise follow-up interviews focusing on the diarists' reflections on their diary entries. The interviews will be recorded and transcribed.

Anticipated discomfort/inconvenience
Keeping the diaries will be time consuming and will require teachers to remain alert to situations which may be included as diary entries. However, the fact that these situations will almost certainly be very familiar to teachers should reduce the burden incurred. The presence of the tape recorder in the follow-up interviews may initially be off-putting but it is expected that this will cause minimal discomfort.
Confidentiality
The investigator undertakes to ensure that the anonymity of all participants be completely respected and that this anonymity be maintained throughout the project, from the initiation to the final report. No identifying information will be displayed, published or made available at any time. Access to the data will be restricted to those persons directly concerned in the research. The investigation will have no bearing on the careers of the participants.

Feedback
Following the investigation, a special report of the project will be compiled and sent to all participants. This will be designed to inform them in readily comprehensible language of the findings of the investigation.

Informed consent form (Participants)
Research project, M.A. (Hons), Macquarie University

I have read and understand the information above and any questions I have asked have been answered to my satisfaction. I agree to participate in this research, knowing I can withdraw at any time. I have been given a copy of this form to keep.

Participant's name:
Participant's signature:
Date:

Investigator's name: JONATHAN CRICHTON
Investigator's signature:
Date:

The ethical aspects of this study have been approved by the Macquarie University Ethics review committee (Human Subjects). If you have any complaints or reservations about any aspect of your participation in this research, you may contact the Committee through its Secretary (Telephone (02) 9850 7448). Any complaint you make will be treated in confidence and investigated, and you will be informed of the outcome.
Informed Consent Form (Institutions) - Participant's copy

This document is a consent form for participants involved in research into the role of the ELICOS teacher. Information about the project, its aims and procedures, is provided below. Please read the form carefully before signing your consent.

The area being studied  
The area of study is the role of the ELICOS teacher.

The aims of the study  
The investigation aims to provide insight into the ELICOS teacher's role as it is shaped within the professional lives of practising teachers. It is anticipated that the study will make a valuable contribution to the professional development of participating teachers as well as informing the training of teachers in the future.

The people responsible for the project  
Principal investigator: Jonathan Crichton; the research is being carried out as part of the requirements of an M.A. (Hons) in Linguistics at Macquarie University.

Contact information:  
22 Urunga St  
North Balgowlah  
NSW 2093  
Tel/fax: 9949 7395

Supervisor: Professor C. N. Candlin, Department of Linguistics, Macquarie University. Tel. 9850 8740

Procedures  
The data to be gathered for the study comprise diaries kept by a sample of ELICOS teachers for a period of one month. The diarists will record situations which they consider to play a significant part in shaping their role as teachers. The data will also comprise follow-up interviews focusing on the diarists' reflections on their diary entries. The interviews will be recorded and transcribed.

Anticipated discomfort/inconvenience  
Keeping the diaries will be time consuming and will require teachers to remain alert to situations which may be included as diary entries. However, the fact that these situations will almost certainly be very familiar to teachers should reduce the burden incurred. The presence of the tape recorder in the follow-up interviews may initially be off-putting but it is expected that this will cause minimal discomfort.
Confidentiality
The investigator undertakes to ensure that the anonymity of all participants be completely respected and that this anonymity be maintained throughout the project, form the initiation to the final report. No identifying information will be displayed, published or made available at any time. Access to the data will be restricted to those persons directly concerned in the research. The investigation will have no bearing on the careers of the participants.

Feedback
Following the investigation, a special report of the project will be compiled and sent to all participants. This will be designed to inform them in readily comprehensible language of the findings of the investigation.

Informed consent form (Institutions)
Research project, M.A. (Hons), Macquarie University

I have read and understand the information above and any questions I have asked have been answered to my satisfaction. I hereby give my consent for this institution to participate in this study. I also promise in no way to affect the giving of willing permission by participants, such permission being a matter of individual choice by participants and in no way the result of pressure, obligation or the expectation of reward or punishment. I have been given a copy of this form to keep.

Name:

Institutional authority:

Signature:

Date:

Investigator's name: JONATHAN CRICHTON

Investigator's signature:

Date:

The ethical aspects of this study have been approved by the Macquarie University Ethics review committee (Human Subjects). If you have any complaints or reservations about any aspect of your participation in this research, you may contact the Committee through its Secretary (Telephone (02) 9850 7448). Any complaint you make will be treated in confidence and investigated, and you will be informed of the outcome.
APPENDIX 11: GUIDELINES FOR PARTICIPANTS

CONFIDENTIAL

CRITICAL INCIDENT DIARY GUIDELINES

Background

As you may know, my PhD involves the linguistic analysis of marketing brochures produced by a sample of ELICOS colleges. The analysis focuses on identifying how the language is used to represent the various groups of 'participants' which appear in the brochures. I'm using 'participants' here to refer to those entities which occupy key roles in the brochures, so the term includes not only people but other entities, such as courses. The participants I have identified fall into four groups, displayed below.

<table>
<thead>
<tr>
<th>Teachers and other staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management and owners</td>
</tr>
<tr>
<td>Courses, resources and facilities</td>
</tr>
<tr>
<td>Students</td>
</tr>
</tbody>
</table>

Clearly these participants don't exist in isolation from one another but together form an intricate set of relationships. For this reason the analysis of the brochures aims to build up an account of how the relationships between these participants are represented.

The next stage of the study moves beyond the analysis of the brochures to explore how ELICOS teachers experience working within this complex web of relationships. For this reason I am working with a number of teachers who are each keeping a diary of their experiences over a period of four weeks.

The purpose of the diary is to gather information about a particular kind of incident encountered by teachers in the course of their professional lives. These are termed 'critical' incidents to emphasise that they are in some way revealing of constraints or conflicts which reduce the teacher's ability to maintain their standards of professional practice. Such incidents involve tensions or dilemmas arising from the interaction between the teacher and one or more of the other participants mentioned above, and may be associated with feelings of confusion or indecision about how to respond to or manage a situation in which the teacher feels his/her professional credibility is tested or at risk.

Such incidents may involve the teacher's dealings with any or all of the participants listed above. It is, however, important that the teacher has encountered this kind of incident before and feels they may encounter it again. This recurrence is important because it suggests that these situations are not simply isolated incidents but are bound up with the role of the ELICOS teacher.

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Guidelines for keeping the diary

1. When you are at work in a professional capacity, be on the look out for critical incidents.

2. As soon as possible after you are caught up in an incident, record it up in the diary bearing in mind the guidelines provided above (If you can't do it straight away, try to make some notes for later). When recording a situation in the diary, please bear in mind the following questions:
   - What happened?
   - What types of participant were involved (including those who, though absent, contributed to the critical nature of the incident)?
   - What were the consequences?
   - How did you feel?
   - What do you think the causes might be?
   - How did this situation resemble others in your experience?

3. Please date when each incident happened, when you wrote it up and when any additions were made. If you wish to replace names and other means of identification please feel free to use letters of the alphabet unrelated to initials or acronyms. I will in any case replace all names and other means of identification with pseudonyms to ensure complete anonymity.

4. Feel free to add to or expand the diary entries if further thoughts occur to you. Don't be constrained to a particular length for each entry. The length of each entry is up to you, but about a page of narrative/reflection would be recommended. Please feel free to return to an entry to make additions which may occur to you later.

I would like to thank you for agreeing to participate in this study and hope that you find it a rewarding experience. If you have any questions or reservations about the study at any stage, please do not hesitate to contact me.

Jonathan Crichton
Research Associate - Centre for Language in Social Life, Macquarie University
How are you being marketed? Investigating how promotional materials construct English language teaching and learning.

Abstract

The workshop looked at one aspect of the commercialisation of education, a phenomenon which has accelerated over the last twenty years or so, and is part of a larger trend to develop products in areas which have not previously been subject to market forces. The workshop focussed on differences between how teaching and learning are depicted in ELT marketing brochures and by teachers. Workshop participants were provided with opportunities to investigate these differences, to evaluate their significance for students, and to assess the potential for a rapprochement between commercially and pedagogically oriented depictions of teaching and learning.

Background

The spread of commercially-oriented education has been seen in all educational sectors, in countries including Australia, New Zealand, the United States, Canada, and Britain (Kenway and Fitzclarence 1998:48; Ball 1993). This phenomenon has arisen in an economic climate which Kenway et al have described as ‘dominated by enthusiasm for growth and for budget cuts’, in which ‘the public sector generally, and the public sector of education in particular, are negatively compared with the private/market sector’ (1993:2). The policy which has been most associated with these pressures is ‘Privatisation’, which Giroux has described as ‘the most powerful educational reform movement’ (1999:141).

At the same time concerns have been expressed about the potential for conflict between commercial and educational priorities, and the implications of this for educational quality and social justice outcomes (Connell 1996). These concerns has arisen against a political backdrop which Apple has described as ‘conservative restoration’ (1996:40ff), with an educational emphasis on national standards, measurable skills, and education as training for work.

This environment continues to produce a wide range of changes in education, as existing institutions react in different ways to commercial pressures; the commercial pressures themselves change; new kinds of educational products, markets and delivery modes are developed; new kinds of educational institutions and linkages emerge; and teaching itself is reformulated to reflect market imperatives (Bernstein 1996:74; Meadmore 1999).

The workshop

This workshop drew on research I am conducting into the relationship between commercial and pedagogic interests in English language teaching. As part of this research, I am analysing ELT marketing brochures to discover how they depict English language education in ways likely to attract new clients. The brochures enter into, and are inseparable from, the recruitment of new clients. They therefore provide an indication of the way the institution would prefer to appear to its clients. It is reasonable, then, to imagine that these depictions reflect and advance a commercial view of education, which renders in a saleable way the institution, its products and services, staff, and clients, and how they participate in the processes of teaching and learning.

The aim of the workshop was to raise awareness of differences between how these participants
and processes are depicted in marketing brochures and how they are understood by teachers. In drawing attention to these differences, the workshop highlighted two distinct discourses which have evolved within commercially-oriented ELT. One, the discourse instantiated in the marketing brochures, reflects and advances a view of education as a saleable product, described in ways likely to attract new clients. In the workshop we called this the 'discourse of attraction'. The other discourse reflects the beliefs and practices associated with English language teaching, which we termed the 'discourse of provision'.

These two discourses are not merely distinct but potentially in conflict. Differences between them are most noticeable in the ways the two discourses cast the processes of language learning and teaching. For example, the language required to woo a client to study English typically understates or does not address the unpredictabilities and stresses of language learning, thus reducing the onus on the learner for the success of learning outcomes. On the other hand, those involved in the provision of English language teaching are more likely to emphasis these aspects of language learning; indeed to argue that learners need to understand the nature of language learning and their role within it as a prerequisite for successful language learning. By highlighting the differences between these discourses, the workshop sought to created the conditions for a dialogue between them - seeking areas of agreement around which an account of learning might be negotiated which would acknowledge both commercial and pedagogic interests.

The workshop included three activities

Activity 1

Participants examined a flyer promoting a number of health services at a holiday retreat. They focussed on the questions of

- What they as potential consumers might find attractive about what was offered;
- What they thought the reality would be like - as a client and as a member of staff.

This was an awareness raising activity which drew attention to how the commercial imperative to attract new clients shapes the way the institution, its employees, products and services, and clients are depicted. These same processes can be seen in the materials used to market ELICOS institutions, and in promotional materials more generally. This activity therefore introduced the question of how key participants and the relationships between them are depicted in promotional materials. These are summarised in figure 1, below.
Activity 2

The second activity focussed on these same participants and relationships but this time in the context of ELT. The aim of the activity was to highlight differences between commercially and pedagogically oriented accounts of the participants and relationships represented in the diagram. The workshop participants were divided into two groups: 'attracters' and 'providers'. The attracters developed brief descriptions of the participants in the diagram which were likely to attract new clients; and the providers developed descriptions of what is required from each participant for successful English language learning.

Activity 3

In the final activity, workshop participants compared and then applied the descriptions they had developed in the second activity to a sample ELT marketing brochure. In the first stage, they established the extent to which the descriptions developed in their 'attracter' and 'provider' groups were represented in the brochure. In the second, they suggested how the text of the brochure might be adjusted to reflect more closely the realities of language learning, while remaining attractive to potential clients.

Outcomes

The main points made by workshop participants during feedback sessions are summarised below.

There was a consensus that in order to attract new clients a brochure would be prudent to render language learning as a predictable process in which language skills would accrue to the learner, rather than a 'hard-won' process involving individual effort and risk. The challenge identified by
a number of participants was how to reconcile the need to attract new clients with the need to prepare students for the rigors of language learning. In discussing how this challenge might be addressed, some participants said that it was simply not possible to alert clients to the challenges of language learning and still expect to attract them. Other participants responded that a compromise might be possible, particularly if information about the realities of language learning could be presented as an example of the institution’s expertise in ELT. The discussion centred on how this notion of expertise could provide a link between the client and the challenges of language learning which would be attractive to potential clients.

A number of suggestions were made on how to develop this notion of expertise. For example, one group suggested that potential clients would be more likely to trust in an institution’s expertise if it had long-term staff, and a low staff turnover. There was some discussion about how this might reassure clients of the quality and reliability of the institution and products. Some participants felt that long-term staff would be difficult to promote in a climate of increasing casualisation. However, it was generally agreed that clients would prefer an organisation with a well-established staff, and that, if circumstances allowed, this should be promoted.

Further discussion centred on the role of teachers in the development of marketing materials. One participant said that at her school both teachers and marketing personnel were involved in drafting promotional materials. None of the other workshop participants worked in an institution where this occurred. There was general agreement that this was a useful step towards a rapprochement between commercial and pedagogic priorities. However the point was also made that the inclusion of teaching staff in the drafting of promotional materials might be just a cosmetic exercise, in which their input was not valued.

Conclusions

The workshop provided insights into how tensions between the discourses of commerce and pedagogy increasingly permeate the practices of English language teaching institutions. The discussion highlighted the ways these tensions are played out in situations where commercial and pedagogic interests compete for the attention of students. The resulting dilemmas are exemplified in promotional materials by the need to depict English language study in ways which will both attract new clients and acknowledge the demands of language learning.

At the same time, the workshop drew attention to the fact that, while commercial and pedagogic interests may compete, they are also increasingly dependent on each other. It is this mutual dependency which creates the need for a dialogue between those who attract clients and those who teach them as students. However, it is also clear from the workshop that achieving a rapprochement between commercial and pedagogic interests would be a complex – probably contentious – process, requiring a collaborative approach to the portrayal and provision of English language teaching and learning. To be productive, any such collaboration would have to reflect an awareness both of the tensions between and mutual dependency of commerce and pedagogy.

Further research in this area might, therefore, focus on investigating and raising awareness among both ‘attracters’ and ‘providers’ of how commercial and pedagogic interests shape the practices of ELT institutions.