

APPENDIX 8: ELICOS ACCREDITATION HANDBOOK

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19: Handbook	
20:	
21:	
22:	
23: February 2002	
46: (c) NEAS Australia	
47:	
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 103: Acronyms Used in the Handbook
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 105:
 106:
 107: AMEP Adult Migrant English Program
 108:
 109: CRICOS Commonwealth Register of Institutions and Courses for
 110: Overseas Students
 111:
 112: DEST Department of Education, Science and Training
 113:
 114: DIMIA Department of Immigration and Multicultural and Indigenous
 115: Affairs
 116:
 117: EA English Australia
 118:
 119: EDS English for Domestic Students
 120:
 121: EIS English for International Students
 122:
 123: ELICOS English Language Intensive Courses for Overseas
 124: Students
 125:
 126: ELT English Language Teaching
 127:
 128: ESOS Education Services for Overseas Students Act 2000
 129: (the ESOS Act)
 130:
 131: NAP NEAS Assessment Panel
 132:
 133: NEAS National ELT Accreditation Scheme
 134:
 135: OSHC Overseas Student Health Cover
 136:
 137: RSA Royal Society of Arts
 138:
 139: TAFE Technical and Further Education
 140:
 141: TESOL Teaching English to Speakers of Other Languages
 142:
 143: UCLES University of Cambridge Local Examinations Syndicate
 144:
 145:
 146:

147: NEAS Accreditation: Introduction and Overview
148:
149:
150: The NEAS
151:
152: The National ELT Accreditation Scheme (NEAS) is a self-funding,
153: non-profit, industry-based body operating independently of government
154: and of industry providers, but enjoying close links with Commonwealth
155: and State Government agencies and industry representative bodies.
156:
157: The primary goal of NEAS is the maintenance of high levels of quality
158: in the provision of English Language Teaching (ELT) programs and
159: services by its client institutions in Australia. Accreditation is
160: widely perceived as being of value to the students, the community and
161: Australia's international reputation in the field of English language
162: education.
163:
164: NEAS accredits two broad categories of institution: those
165: institutions in Australia which provide English language intensive
166: courses to overseas students, known by the acronym ELICOS; and
167: providers of Australia's national Adult Migrant English Program
168: (AMEP).
169:
170: NEAS has been providing ELICOS accreditation services in Australia
171: since 1990 to both public and private sectors. NEAS accreditation is
172: recognised by all Australian Governments and is regarded by State
173: Governments as pre-requisite to mandatory registration for ELICOS.
174: NEAS has been providing AMEP accreditation services on behalf of the
175: AMEP funding authority, the Department of Immigration and
176: Multicultural and Indigenous Affairs (DIMIA), since 1997-98, when the
177: AMEP was opened up to competitive tendering.
178:
179:
180: NEAS Standards
181:
182: NEAS standards are set out in two key documents:
183:
184: * Accreditation as an ELICOS Institution: Standards and Criteria
185:
186: * Service Delivery in the Adult Migrant English Program: Standards and
187: Criteria for Accreditation
188:
189: The NEAS standards and criteria have been developed in consultation
190: with governments, industry bodies and the ELT profession. Standards
191: and criteria are constantly under review in response to changes and
192: developments in the field, but are changed only after wide
193: consultation with the ELT community and those associated with it.
194:
195:
196: Purpose of the Accreditation Scheme
197:
198: The purpose of the scheme is:
199:
200: * to set standards of quality in the provision of ELT programs and
201: related services in Australia

202:

203: * to provide a professional judgment as to whether client institutions

204: meet and continue to meet those standards

205:

206: * to provide public recognition of compliant institutions.

207:

208:

209: The NEAS Assessment Panel

210:

211: At the heart of NEAS processes is a system of peer review of

212: accredited institutions or those seeking accreditation. Reviews are

213: carried out through onsite assessment visits by members of the NEAS

214: Assessment Panel (NAP). They take place at various stages in the

215: accreditation process and on an ongoing basis after accreditation has

216: been gained.

217:

218: Members of the NAP are acknowledged experts in the ELT field,

219: specifically briefed and trained by NEAS on their role in the

220: accreditation system. They are engaged as needed by NEAS under a

221: separate contract of confidentiality in respect of each institution

222: they assess. Panel members are bound to refuse an engagement if a

223: conflict of interest exists or is likely to exist. Similarly,

224: institutions have the right to refuse a panel member and request a

225: substitute if they have good reason to believe there is a likelihood

226: of conflict of interest.

227:

228:

229: Benefits of accreditation

230:

231: NEAS accredited institutions:

232:

233: * have the right to use the "accredited by NEAS Australia" logo in

234: their promotional activities, recognised worldwide as a mark of

235: quality

236:

237: * receive frequent informed feedback from the NEAS panel of ELT

238: experts on the quality of their educational programs

239:

240: * have access to a range of professional education programs for

241: management personnel

242:

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

244:

245: Additionally, NEAS accredited institutions providing ELICOS programs:

246:

247: * are committed to a national code of conduct focusing on the best

248: interests of the students and have access to professional guidance on

249: compliance with the code

250:

251: * are eligible to apply for membership of the peak industry body,

252: English Australia (formerly the ELICOS Association)

253:

254: * are promoted nationally and internationally on the NEAS web site

255:

256: * 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.

312:
313:
314: Assessment for AMEP accreditation
315:
316: AMEP providers are assessed for accreditation shortly after finalising
317: their contract with DIMIA. The institution's AMEP programs and
318: services are assessed by applying the criteria listed in the AMEP
319: Standards and Criteria for Accreditation. The standards address the
320: following aspects of the institution's AMEP provision:
321:
322: * Physical facilities
323: * Staff
324: * Educational resources
325: * Tuition related practices
326: * Support services
327: * Program evaluation
328: * Promotion of the AMEP
329:
330:
331: Duration of accreditation
332:
333: Once accredited, institutions retain their accreditation as long as
334: they continue to comply with the accreditation criteria, operate
335: within the conditions of their accreditation, cooperate in ongoing
336: monitoring arrangements, and continue to provide ELT programs.
337:
338:
339: Ongoing monitoring
340:
341: The following are the major elements of ongoing monitoring.
342:
343: The accredited institution is required to:
344:
345: * provide NEAS with an annual return of information relating to the
346: conduct of the educational program over the preceding twelve months
347:
348: * cooperate in monitoring visits by a member of the NEAS Assessment
349: Panel, from which feedback is provided to the institution
350:
351: * provide prompt advice to NEAS of any changes the institution may
352: make to accredited facilities and personnel
353:
354: * (ELICOS only) apply to NEAS before promoting or enrolling students
355: in any new or additional courses, other than those appearing in the
356: institution's Conditions of Accreditation
357:
358: Ongoing monitoring also includes the investigation of any complaints
359: received by NEAS. The institution complained about is required to
360: cooperate with NEAS in the investigation of the complaint and any
361: recommended follow up action. (See Complaints Procedures)
362:
363:
364: Automatic withdrawal of accreditation
365:
366: Accreditation is automatically withdrawn if an institution ceases

367: providing the ELT programs for which it is accredited, unless the
 368: institution has applied to NEAS for voluntary suspension of
 369: accreditation before the cessation of courses.
 370:
 371:
 372: NEAS structure and composition
 373:
 374: The National ELT Accreditation Scheme Limited was incorporated in May
 375: 1990 as a company with limited liability. Its members are the members
 376: of the Council of the industry peak body, English Australia (formerly
 377: the ELICOS Association).
 378:
 379: The scheme is directed by the NEAS Board and managed by the National
 380: Manager. The Board comprises a Chairperson, who is required under the
 381: Constitution to be a retired judge or distinguished member of the
 382: legal profession, and four other Directors, three of whom are elected
 383: by the members and the fourth appointed by the Council of English
 384: Australia to represent the EA.
 385:
 386: The NEAS Board is responsible for policy review and development,
 387: accreditation standards, appeals against decisions of the ELICOS
 388: Accreditation Committee, determination of complaints against
 389: accredited institutions and any other matters affecting the standing,
 390: reputation or viability of NEAS.
 391:
 392: Decisions on institutional accreditation for ELICOS are made by the
 393: ELICOS Accreditation Committee, consisting of independent members
 394: drawn from a panel of informed community members, together with the
 395: two members of the NEAS Assessment Panel who visited the institution
 396: in question. The Committee is chaired by the National Manager.
 397:
 398: Decisions on the grant of initial accreditation to AMEP providers are
 399: made by an appropriately constituted Subcommittee of the NEAS Board.
 400:
 401: The day-to-day running of the Scheme is the responsibility of the
 402: National Manager, supported by a small executive staff. The National
 403: Manager reports directly to the Chair of the NEAS Board.
 404:
 405: NEAS operational and infrastructure funding is derived from
 406: accreditation fees paid by its ELICOS client institutions and from the
 407: Australian Government in respect of the Adult Migrant English Program
 408: accreditation scheme.
 409:
 410: The Chair of the Board and the National Manager each provide an annual
 411: report to members, containing qualitative and quantitative information
 412: on the year's operations. The National Manager's report is published
 413: and widely circulated.
 414:
 415: NEAS accountants provide an annual audited account to the Directors
 416: and members.
 417:
 418: NEAS reports quarterly and annually to the Department of Immigration
 419: and Multicultural and Indigenous Affairs in respect of the AMEP
 420: scheme.
 421:

422:
 423:
 424:
 425: Definitions
 426:
 427:
 428: English Language Teaching (ELT)
 429:
 430: ELT refers to the teaching of English as a Foreign or Second Language,
 431: sometimes referred to as Teaching English to Speakers of Other
 432: Languages (TESOL). NEAS accreditation is not available in respect of
 433: the teaching of English as a mother tongue.
 434:
 435: ELT courses may be provided for international students, viz those
 436: students who will return to their countries after completion of their
 437: studies, or for domestic students, viz those who are permanent
 438: residents of Australia.
 439:
 440: ELT courses may be provided by institutions in the public or private
 441: sectors. NEAS accreditation is available in both sectors. Both are
 442: subject to the same accreditation criteria.
 443:
 444:
 445: English for International Students (EIS)
 446:
 447: Students in these programs are in Australia for a defined period,
 448: normally limited by the terms of their visa. ELT courses for these
 449: students may be part-time or full-time. However, if they are to be
 450: offered to overseas students as defined within the terms of the ESOS
 451: Act, they must be full-time and must be conducted in compliance with
 452: the requirements of the ESOS Act. (See ELICOS below)
 453:
 454: Full-time EIS courses (ELICOS)
 455:
 456: ELICOS, standing for English Language Intensive Courses for Overseas
 457: Students, is the collective term referring to EIS programs which
 458: provide for students who are holders of student visas. ELICOS
 459: providers are subject to the range of government regulations under the
 460: Commonwealth's Education Services for Overseas Students (ESOS) Act
 461: 2000 which apply to all providers of education or training services to
 462: overseas students. Through the provisions of the ESOS Act, the
 463: issuance of student visas is linked to the registration of providers.
 464:
 465: Providers of courses to overseas students will only be registered by
 466: the Commonwealth if they have met the requirements of the ESOS Act and
 467: if they have first been approved for registration by the government of
 468: the State or Territory in which the courses are to be provided. In
 469: the case of ELICOS, State and Territory governments have agreed that
 470: this approval will generally not be given unless the institution has
 471: been accepted by NEAS as a candidate for ELICOS accreditation.
 472:
 473: Full information on compliance with the ESOS Act and regulations is
 474: available in the DEST's Guide for Providers of Education and Training
 475: Services to Overseas Students.
 476:

477: ELICOS courses are full-time. Each student must attend the
 478: institution for at least 25 hours per week and must be provided with
 479: at least 25 hours' per week teacher contact. There is no standard
 480: length for ELICOS courses.
 481:
 482: Full-time EIS courses (non-ELICOS)
 483:
 484: The law permits holders of visitor or other short-term visas to be
 485: enrolled in full-time EIS courses, but for durations of twelve weeks
 486: or less. The provisions of the ESOS Act do not apply to these
 487: learners.
 488:
 489: Part-time EIS courses
 490:
 491: Part-time EIS courses may be offered to holders of visas other than
 492: student visas, eg Working Holiday Maker, Visitor. They may be offered
 493: in conjunction with a program of cultural or recreational tours or
 494: sporting activities. Part-time EIS courses cannot be entered on the
 495: Commonwealth Register of Institutions and Courses for Overseas
 496: Students (CRICOS) and cannot be made available as their principal
 497: course to holders of student visas.
 498:
 499:
 500: English for Domestic Students (EDS)
 501:
 502: Courses in English for Domestic Students may be full or part-time.
 503: They may be offered by institutions in both the public and the private
 504: sectors.
 505:
 506: The Adult Migrant English Program (AMEP)
 507:
 508: The AMEP is a national program fully funded by the Commonwealth. It
 509: is available to migrants assessed as having less than functional
 510: English and is provided in all States and Territories by a range of
 511: institutions in both public and private sectors. AMEP providers offer
 512: the service on behalf of and under contract to the Department of
 513: Immigration and Multicultural and Indigenous Affairs (DIMIA).
 514:
 515: Accreditation and ongoing quality monitoring by NEAS of AMEP programs
 516: and services are included amongst the conditions of contract between
 517: AMEP providers and DIMIA.
 518:
 519: Non-AMEP
 520:
 521: Courses and classes in English for immigrants are available through a
 522: wide range of community, private and TAFE colleges. Non-AMEP courses
 523: are not at this stage eligible for NEAS accreditation.
 524:
 525:
 526:
 527: The ELICOS Accreditation Process
 528:
 529:
 530: Initial Eligibility
 531:

532: To be eligible to apply for ELICOS accreditation, institutions must be
533: in the ownership and control of an Australian based company or
534: individual and have been providing ELICOS in Australia for at least
535: twelve months as a candidate for accreditation, or (until December
536: 2001) as provisionally accredited.

537:

538:

539: A Three-Stage Process

540:

541: ELICOS accreditation is a three-stage process:

542:

543: * the Preparatory Stage (pre-operational), during which the

544: institution prepares its business and educational plans;

545:

546: * the Candidacy Stage, during which the institution, now operating,

547: progressively implements its plans for achieving accreditation

548: compliance (normally twelve months);

549:

550: * the Accreditation Stage, when, subject to a successful application

551: for accreditation, the institution is fully accredited.

552:

553: The achievement of candidacy status enables candidate institutions to

554: apply to the relevant State/Territory registration authority for

555: registration on the CRICOS, which, if successful, authorises them to

556: recruit and enrol overseas students immediately.

557:

558: The institution receives professional guidance from NEAS during the

559: period of candidacy, normally twelve months, and is annually monitored

560: by NEAS for ongoing compliance once it has been fully accredited.

561:

562:

563:

564:

565:

566:

567:

568:

569:

570:

571:

572:

573:

574:

575:

576:

577:

578:

579:

580: Stages of Accreditation for ELICOS

581:

582:

583: Stage

584: Steps

585: Documents

586: Preparatory

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:
 620:
 621:
 622:
 623:
 624:
 625:
 626:
 627:
 628:
 629:
 630:
 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:

642: * achieve a working knowledge of the relevant government regulations
 643: and codes of practice for providers of educational services to
 644: international students;
 645:
 646: * develop strategic plans and operational policies reflecting an
 647: awareness of the particular needs of overseas students who are
 648: learners of English;
 649:
 650: * acquire certain key resources which are pre-requisite to the grant
 651: of candidacy.
 652:
 653: The detailed requirements for candidacy can be found in Form C1,
 654: Application for Candidacy, and the accompanying guide.
 655:
 656: Upon completion of these preparations, the institution should make
 657: application to NEAS for candidacy. The assessment for candidacy
 658: includes an onsite visit by a NEAS representative to verify that the
 659: key resources required for candidacy are in place.
 660:
 661: Once accepted by NEAS as a candidate for accreditation, the
 662: institution is eligible to apply to the State or Territory registering
 663: authority for registration on the Commonwealth Register of
 664: Institutions and Courses for Overseas Students (CRICOS) and, if
 665: successful, to begin enrolling overseas students. But it is no more
 666: than a first step towards accreditation. The achievement of candidacy
 667: in no way implies that accreditation will automatically follow.
 668:
 669: The period of candidacy officially commences on the date of enrolment
 670: 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
 678: of the candidate institution is encouraged to attend a practical
 679: workshop aimed at familiarisation with NEAS accreditation standards
 680: and the regulatory environment in which ELICOS operates. NEAS will
 681: furnish a schedule of workshops held in the institution's region.
 682:
 683: The workshop also presents the opportunity to raise issues in an
 684: informal setting and for self-assessment against the pertinent
 685: accreditation criteria.
 686:
 687:
 688: * Mentoring
 689:
 690: Also during the period of candidacy, the institution receives two
 691: separate visits from a member of the NEAS Assessment Panel whom NEAS
 692: appoints to the institution as a mentor. In common with all members
 693: of the NAP, the mentor will be bound by a contract of confidentiality
 694: and will not accept the engagement if there is any possibility of
 695: conflict of interest. Similarly, the institution may refuse a
 696: particular mentor and request a substitute, subject to advancing a

697: good reason.

698:

699: The role of the mentor is to provide informed guidance to the
700: institution on its progress towards meeting the objectives of its
701: plans in the various areas of accreditation and to assist the

702: institution in identifying any aspects of the operations where

703: improvements could be made. The mentor does not have a role in

704: drawing up, overseeing, or checking the accreditation application on

705: behalf of the institution. This is the institution's own

706: responsibility.

707:

708: The mentor is not involved in the eventual accreditation decision.

709: Should accreditation be refused or deferred for any reason, the mentor

710: may not be held in any way responsible for the refusal or deferral.

711:

712: * Application for accreditation

713:

714: Once the institution is satisfied it is in a position to meet the NEAS

715: accreditation criteria (normally one year from the date of enrolment

716: of the first cohort of ELICOS students), it submits its application

717: for accreditation. Application for accreditation must be made on Form

718: A1: Application for Accreditation.

719:

720: While there is an expectation that institutions will be ready for

721: accreditation assessment after one year's operation as a candidate,

722: there may be instances where more time is needed because of particular

723: circumstances which may not have been foreseen. In these instances,

724: application should be made to NEAS for extension of the candidacy

725: period. Such applications are assessed on their individual merits.

726:

727: The application for accreditation addresses each of the NEAS quality

728: standards (see ELICOS Standards and Criteria), asking the institution

729: to assess itself against each of the accreditation criteria. The

730: self-assessment is then validated externally by NEAS assessors, two of

731: whom visit the institution to observe its programs and services in

732: full operation.

733:

734: The accreditation assessment process is described in greater detail in

735: the Guide to Applying for Accreditation which accompanies the

736: accreditation application form.

737:

738: * Accreditation Committee Decision

739:

740: Following their visit to the institution, the NEAS assessors provide a

741: report to the Accreditation Committee. The report is considered by

742: the Committee alongside the self-assessment and documentation

743: furnished by the applicant.

744:

745: The Committee may grant, defer or refuse accreditation. In the case

746: of a deferral or refusal, the institution is given full reasons.

747:

748: Appeals against adverse decisions of the Accreditation Committee may

749: be made to the Board of NEAS. Appeals must be lodged within three

750: weeks of notification of refusal.

751:

752:

753: The Accreditation Stage

754:

755: * Conditions of Accreditation

756:

757: Institutions, upon accreditation, are issued with a Certificate of

758: Accreditation and a document detailing the conditions of their

759: accreditation. These relate to:

760:

761: * premises where courses are delivered

762: * Principal Administrator

763: * Director of Studies

764: * ELICOS courses to which accreditation relates

765: * ownership of institution

766: * maximum number of ELICOS students

767:

768: Accredited institutions are required to give NEAS prompt advice of any

769: changes to their conditions of accreditation. This should be provided

770: before the change is effected where possible.

771:

772: Accredited institutions may not vary the scope of their ELICOS

773: operations by the addition of any new course without first applying to

774: NEAS for assessment of the course and inclusion within the conditions

775: of accreditation. Following NEAS assessment of the new course against

776: the pertinent accreditation criteria, the institution should make

777: application to the State/Territory registering authority for variation

778: to the provider's CRICOS entry.

779:

780: The documents to be submitted to NEAS when applying for variation of

781: conditions of accreditation are:

782:

783: * Change of premises: copies of documents from the local authority

784: showing consent for building and/or development application; floor

785: plan showing usage and dimensions of all rooms; fire safety

786: certification.

787:

788: * Change of Principal Administrator: name, curriculum vitae, signed

789: contract of employment, statement of duties and statutory declaration

790: (available from the NEAS office).

791:

792: * Change of Director of Studies: name, curriculum vitae, certified

793: copies of relevant qualifications, signed contract of employment,

794: statement of duties and statutory declaration (available from the NEAS

795: office).

796:

797: * Additional Courses: syllabus details as set out in NEAS document,

798: Application for Additional Courses.

799:

800: * Change of Ownership: company details of new owner; documentary

801: evidence of sale; financial statements of new owner relating to most

802: recent trading year; new owner's written undertaking to comply with

803: accreditation requirements and code of practice.

804:

805: * Change to maximum number of students: floor plan showing location

806: and dimensions of extra space

807:
808: * Annual return
809:
810: Accredited institutions are required to provide NEAS with an annual
811: return of information relating to the conduct of their educational
812: program over the preceding twelve months. The first of these is due
813: twelve months from the date upon which accreditation was granted.
814:
815: The annual return must be accompanied by an annual fee. (See Fee
816: Schedule)
817:
818: * Routine monitoring visits
819:
820: As a condition of the maintenance of accreditation, accredited
821: institutions are required to cooperate in monitoring visits by a
822: member of the NEAS Assessment Panel from time to time. Notice is
823: given of the visit. The member of the panel will openly discuss any
824: issues which appear to need attention and provide informed advice on
825: matters embraced by accreditation standards and criteria. The panel
826: member reports to NEAS.
827:
828:
829: Duration of Accreditation
830:
831: Once accredited, institutions retain their accreditation as long as
832: they continue to comply with the accreditation criteria, operate
833: within their conditions of accreditation, cooperate in ongoing
834: monitoring arrangements, and continue to provide ELICOS programs and
835: services.
836:
837:
838:
839:
840:
841: Complaints Procedures
842:
843:
844: NEAS investigates complaints lodged against accredited institutions,
845: provided they are related to the accreditation criteria, are submitted
846: in writing and are not anonymous. Although NEAS does not investigate
847: anonymous complaints, the name of the complainant is not necessarily
848: revealed to the institution complained about.
849:
850: Complaints which are not normally considered by NEAS because they are
851: unrelated to the accreditation criteria include individual grievances
852: from teachers about pay claims and complaints from individual students
853: over refunds, unless it can be shown that the institution provided the
854: student with inadequate or unclear information in handbooks, brochures
855: or other publications.
856:
857: The first step taken by NEAS in the investigation of a complaint is to
858: advise the Principal of the named institution of the complaint and
859: request a response. Depending on the nature of the complaint, the
860: Principal may be asked to explain the apparent failure of its internal
861: grievance procedures in this instance.

862:
863: Subject to the seriousness of the complaint and the adequacy of the
864: institution's response, NEAS may order a short notice visit by a NEAS
865: representative, focusing specifically on the substance of the
866: complaint.
867:
868: If the complaint appears to have some justification and reveals
869: possible breaches of NEAS guidelines, NEAS so advises the institution,
870: informing the Principal of the matters in need of remedial action and
871: nominating a timeframe for completion, or evidence of substantial
872: progress towards completion.
873:
874: In cases where remedial action proves unsatisfactory, the NEAS
875: National Manager refers the matter to the NEAS Board for its
876: consideration.
877:
878: The NEAS Board, in its consideration of the matter, may order further
879: investigation, extend the time allowed for remediation, or require the
880: institution to show cause why its accreditation should not be
881: withdrawn.
882:
883: As a final sanction, the NEAS Board may withdraw accreditation and
884: advise the relevant Government authority of the withdrawal.
885:
886:
887:
888:
889: Guidelines for Use of NEAS Logo - ELICOS
890:
891:
892: * The NEAS ELICOS logo is only available for use by institutions which
893: are accredited for ELICOS and participate in the NEAS annual
894: monitoring system.
895:
896:
897: * The logo is provided as a set of bromides to institutions at the
898: time of the grant of accreditation. Additional copies are available
899: from the NEAS office.
900:
901:
902: * The logo carries the wording "Accredited by NEAS Australia" and must
903: not be altered or added to in any way when reproduced in promotional
904: literature, information brochures or stationery.
905:
906:
907: * If you wish to use words to accompany the logo, the appropriate
908: wording is: " [Institution name] is accredited by the
909: National ELT Accreditation Scheme".
910:
911:
912: * Care should be taken to avoid placing the NEAS logo so as to give
913: the impression that programs are NEAS accredited where this is not the
914: case. For example, holiday programs or study tours offering less than
915: 25 hours per week of supervised study are in general not included in
916: NEAS institutional accreditation. Where such courses are promoted,

917: there should be a note to the effect that they are not accredited or
 918: approved for holders of student visas.
 930:
 931: Standards
 932:
 933: and
 934:
 935: Criteria
 959:
 960: Summary of Standards
 961:
 962:
 963: SECTION A: MANAGEMENT, FINANCE AND ADMINISTRATION
 964:
 965: The institution has an effective management structure designed to
 966: further the mission and goals of the institution. The institution is
 967: committed to observing ethical practices in staff employment,
 968: student administration and financial control.
 969:
 970: SECTION B: PREMISES
 971:
 972: The institution's premises provide a safe, pleasant learning and
 973: teaching environment, appropriately designed and equipped to support
 974: the range of teaching programs and student services offered by the
 975: institution.
 976:
 977: SECTION C: SPECIALIST STAFF
 978:
 979: The institution employs specialist staff who are suitably qualified
 980: and sensitive to the cultural backgrounds of the students and provides
 981: them with appropriate working conditions and inservice professional
 982: development opportunities.
 983:
 984: SECTION D: STUDENT SERVICES
 985:
 986: The institution provides a range of support and pastoral care services
 987: tailored to the needs of international students who are at varying
 988: stages of English language proficiency development.
 989:
 990: SECTION E: CURRICULUM
 991:
 992: The institution's curriculum is purposeful, coherent and documented
 993: and facilitates the design of teaching programs to meet the needs and
 994: requirements of students.
 995:
 996: SECTION F: STUDENT ASSESSMENT
 997:
 998: The institution's practices and procedures for the assessment of
 999: students are appropriate, fair and equitable and operate at all times
 1000: in the best interests of the students.
 1001:
 1002: SECTION G: MATERIALS AND EQUIPMENT
 1003:
 1004: The institution maintains a stock of material resources which is aimed
 1005: 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,
 1062: regulations and guidelines as they occur.
 1063:
 1064: 2.4 The Principal Administrator understands his/her responsibilities
 1065: to the regulatory agencies, ie DIMIA, DEST, the State/Territory
 1066: Government registering authority and NEAS, and reports diligently to
 1067: those agencies as required by their rules from time to time. (See Note
 1068: 2.4)
 1069:
 1070:
 1071: 3. Staff organisation
 1072:
 1073: 3.1 The administration is structured to ensure that all administrative
 1074: functions necessary for the achievement of the institution's goals are
 1075: effectively executed. (See Note 3)
 1076:
 1077:
 1078: 3.2 Individuals assigned duties and responsibilities are suitably
 1079: qualified/equipped to accomplish their duties effectively.
 1080:
 1081:
 1082: 4. Employment conditions
 1083:
 1084: 4.1 The institution, as an ethical and responsible employer,
 1085: ensures that all staff have working conditions appropriate to the
 1086: duties and responsibilities of the position and consistent with
 1087: industrial legislation requirements. (See Note 4)
 1088:
 1089: 4.2 Each staff member, at the time of taking up employment,
 1090: receives from the institution a signed statement setting out the terms
 1091: and conditions of employment and a statement of the duties of the
 1092: position.
 1093:
 1094:
 1095: 5. Channels of communication
 1096:
 1097: 5.1 The institution's management incorporates structures and
 1098: processes for the prompt and efficient dissemination to staff of
 1099: information pertinent to the execution of their duties, for example
 1100: changes in migration laws or regulations affecting the institution and
 1101: its students, changes in internal policies of the institution, changes
 1102: to NEAS guidelines/criteria.
 1103:
 1104:
 1105: 6. Financial management
 1106:
 1107: 6.1 Financial reporting for the institution is in the hands of an
 1108: appropriately qualified person and is conducted in accordance with
 1109: accepted accounting standards and practices. (See Note 6)
 1110:
 1111: 6.2 The institution ensures that it has access at all times to
 1112: sufficient reserves of funds to meet its financial obligations.
 1113:
 1120:
 1121: Section A: Notes

1122:
 1123:
 1124:
 1125: CRITERION 2. SENIOR MANAGEMENT
 1126:
 1127: 2.1 The Principal Administrator is identified as the person
 1128: responsible for the day-to-day management of the ELT institution,
 1129: irrespective of his/her official status within the wider organisation
 1130: of which it may form part.
 1131:
 1132: 2.2 The Principal Administrator is in the full-time employ of the
 1133: organisation which owns or controls the institution.
 1134:
 1135: 2.3 It should be noted that the person nominated as the Principal
 1136: Administrator is the one NEAS holds responsible for the institution's
 1137: compliance with accreditation criteria.
 1138:
 1139: 2.4 Detailed information about providers' obligations and
 1140: responsibilities under Commonwealth legislation, notably the Education
 1141: Services for Overseas Students Act 2000 (the ESOS Act) and Regulations
 1142: and the DEST booklet, A Guide to Providers of Education and Training
 1143: to Overseas Students, are available online through the following
 1144: Internet address:
 1145: http://www.detya.gov.au/iae/international/esos_cricos.htm.
 1146:
 1147: It should be noted that the National Code (Section 14) includes a
 1148: requirement that a change of ownership or management be notified to
 1149: the registering authority within 14 days of the change being made.
 1150:
 1151: 2.5 The above site includes reference to the National Code of Practice
 1152: for Registration Authorities and Providers of Education and Training
 1153: to Overseas Students (The National Code), established under the terms
 1154: of the ESOS Act 2000. The full text of the National Code of Practice
 1155: is at Appendix A to this document.
 1156:
 1157:
 1158: CRITERION 3. STAFF ORGANISATION
 1159:
 1160: The following range of responsibilities should be covered in the
 1161: staffing structure:
 1162:
 1163: * interviewing/recruiting teaching staff
 1164: * enrolment of students, including collecting fees
 1165: * answering student enquiries
 1166: * dealing with recruiting agents
 1167: * marketing and promotion
 1168: * student testing for class placement
 1169: * assisting students with accommodation location/placement
 1170: * visa information and health insurance
 1171: * educational and welfare counselling of students
 1172: * staff development activities
 1173: * management of student records in accordance with the ESOS Act 2000
 1174: * financial administration
 1175:
 1176:

1177:
 1178: Section A: Notes (continued)
 1179:
 1180:
 1181:
 1182: Criterion 4. Employment conditions
 1183:
 1184: NEAS does not set down particular working conditions for staff. These
 1185: should be determined by referring to the relevant industrial
 1186: legislation in the State/Territory in which the institution is
 1187: located.
 1188:
 1189:
 1190: CRITERION 6. FINANCIAL MANAGEMENT
 1191:
 1192: An accountant is considered appropriately qualified if accepted for
 1193: membership of the Institute of Chartered Accountants or Australian
 1194: Society of Certified Practising Accountants.
 1195:
 1196:
 1197:
 1198:
 1199: Section B: Premises
 1200:
 1201:
 1202: Standard
 1203:
 1204: The institution's premises provide a safe, pleasant learning and
 1205: teaching environment, appropriately designed and equipped to support
 1206: the range of teaching programs and student services
 1207: offered by the institution.
 1208:
 1209:
 1210: Compliance Criteria
 1211:
 1212:
 1213: 1. Secure tenure
 1214:
 1215: 1.1 The institution's ownership has secure tenure of the premises
 1216: in which English Language Teaching programs are conducted, either as
 1217: lessee or owner/part-owner. (See Note 1)
 1218:
 1219:
 1220: 2. Health and safety of occupants
 1221:
 1222: 2.1 All premises used for English Language Teaching programs and
 1223: services comply with relevant local government regulations including:
 1224:
 1225: * zoning for educational purposes
 1226: * building regulations
 1227: * fire safety controls
 1228: * approved maximum number of occupants.
 1229:
 1230: 2.2 All areas are adequately lit and suitably ventilated for the
 1231: number of occupants.

1232:

1233: 2.3 Classrooms are insulated against outside noise and/or undue

1234: interference from other classrooms.

1235:

1236: 2.4 Toilets and washrooms are provided in sufficient number to meet

1237: local government regulations and are kept in a clean and hygienic

1238: condition.

1239:

1240: 2.5 Buildings and outside areas are maintained in a safe and hygienic

1241: condition.

1242:

1243: 2.6 Buildings are clearly identified on the outside by signage readily

1244: understandable by students.

1245:

1246:

1247: 3. Designated areas

1248:

1249: 3.1 The premises include areas designated for:

1250:

1251: * classroom teaching

1252: * teacher studies/staffrooms

1253: * student recreation

1254: * confidential counselling

1255: * offices

1256: * storage.

1257:

1258: 3.2 Where other facilities and services are offered by the

1259: institution, eg self-access or private study, library, resource

1260: centre, language laboratory, the premises include areas specifically

1261: designated for these purposes.

1262:

1263:

1264: 4. Classrooms and other study areas

1265:

1266: 4.1 Classrooms are large enough to accommodate the number of

1267: students and teachers occupying them, in accordance with the

1268: appropriate standard. (See Note 4)

1269:

1270: 4.2 Classrooms are fitted with power points, writing boards and

1271: teacher and student furniture suitable for language teaching

1272: activities.

1273:

1274: 4.3 Additional study areas - eg self-access, resource centre,

1275: private study, language laboratory - are sized, fitted out, furnished

1276: and equipped in accordance with the part they play in the educational

1277: program.

1278:

1279:

1280: 5. Teacher studies/staffrooms

1281:

1282: 5.1 Teacher studies/staffrooms are large enough to accommodate one

1283: desk or workspace for each equivalent full time teacher when at

1284: maximum capacity.

1285:

1286: 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:
 1336:
 1337: Section B: Notes
 1338:
 1339:
 1340:
 1341: CRITERION 1. SECURE TENURE
 1342:
 1343: Section 17 of the National Code includes a requirement that the
 1344: relevant authorities should be notified of the intention to relocate
 1345: premises at least three weeks before the move is effected.
 1346:
 1347:
 1348: CRITERION 4. CLASSROOM SIZE
 1349:
 1350: The Building Code of Australia sets down a standard for classrooms of
 1351: two square metres per occupant. NEAS will apply this standard to all
 1352: institutions which apply for accreditation of premises from 1 July
 1353: 2001. The previously existing standard of 1.6 square metres per
 1354: student will continue to apply to classrooms accredited prior to 1
 1355: July 2001 as long as the currently accredited provider is occupying

1356: them, unless there is a change of room functions.

1357:

1358:

1359: CRITERION 6. STUDENT COMMON AREAS

1360:

1361: The premises should include rooms or areas for student recreation,

1362: where students can relax during breaks, take refreshments, meet

1363: informally and so on. The size of the area and the facilities offered

1364: will differ according to such factors as the size of the student body

1365: and the ELICOS institution's proximity to suitable food outlets,

1366: takeaways, etc. It should never be necessary for students to eat

1367: their lunch in the classroom.

1368:

1369:

1370:

1371:

1372: Section C: Specialist Staff

1373:

1374:

1375: Standard

1376:

1377: The institution employs specialist staff who are suitably qualified

1378: and sensitive to the cultural backgrounds of the students and provides

1379: them with

1380: appropriate working conditions and inservice professional

1381: development opportunities.

1382:

1383:

1384: Compliance Criteria

1385:

1386:

1387: 1. Director of Studies

1388:

1389: 1.1 Academic management is in the hands of a Director of Studies,

1390: who is in the full-time employ of the institution. (See Note 1.1)

1391:

1392: 1.2 The Director of Studies is an experienced TESOL professional

1393: with recognised postgraduate qualifications in TESOL. (See Note 1.2)

1394:

1395: 1.3 The Director of Studies is committed to achieving the

1396: institution's educational goals through the development,

1397: implementation and review of the curriculum, the management of the

1398: educational resources and the provision of guidance to the teaching

1399: staff.

1400:

1401: 1.4 The Director of Studies maintains an up to date knowledge of

1402: significant developments in TESOL theory and practice.

1403:

1404: 1.5 At the time of taking up appointment, the Director of Studies

1405: received in writing from the institution a signed statement of the job

1406: description and the terms and conditions of employment.

1407:

1408:

1409: 2. Teachers

1410:

1411: 2.1 Teachers in ELT programs are trained/experienced professional
 1412: teachers and hold specialist TESOL qualifications. (See Notes 2.1 to
 1413: 2.8)
 1414:
 1415: 2.2 Where the institution offers courses of preparation for entry to
 1416: Australian secondary schools, at least 50% of instruction on these
 1417: courses is provided by TESOL teachers who received their pre-service
 1418: training in the Australian secondary system, or who have at least 800
 1419: hours experience in teaching in Australian secondary schools.
 1420:
 1421: 2.3 The institution verifies the qualifications of all teachers
 1422: employed to teach on ELT programs.
 1423:
 1424: 2.4 Each teacher, at the time of taking up appointment, receives in
 1425: writing from the institution a signed statement containing a job
 1426: description and the terms and conditions of employment. (See Note 2.9)
 1427:
 1428: 2.5 The institution ensures that teachers' working conditions and
 1429: rates of pay compare favourably with similar teaching systems, to
 1430: promote equitable and harmonious employment arrangements which enhance
 1431: the quality of education offered. (See Note 2.10)
 1432:
 1433:
 1434: 3. Teacher professional development
 1435:
 1436: 3.1 The institution provides for the ongoing professional
 1437: development of teaching staff, to ensure teachers are kept up to date
 1438: with current knowledge, theory and practice in the field. (See Note
 1439: 3)
 1440:
 1441: 3.2 The institution has an effective policy and procedures for the
 1442: induction of new teachers.
 1443:
 1444: 3.3 Teachers receive ongoing guidance and support from the
 1445: Director of Studies on course design and lesson planning, with
 1446: particular attention to the less experienced teachers.
 1447:
 1448:
 1449: 4. Counselling staff
 1450:
 1451: 4.1 The institution employs at least one person equipped to
 1452: provide counselling to students on further education avenues and
 1453: opportunities. (See Note 4)
 1454:
 1455: 4.2 The institution employs in the role of welfare counsellor a
 1456: person who has formal qualifications in counselling and/or relevant
 1457: experience in advising students in an intercultural context.
 1458:
 1459: 4.3 In appointing a person to the counsellor role, care is taken
 1460: to avoid the potential for conflicts of interest and to ensure that
 1461: students' cultural and gender sensitivities are respected.
 1462:
 1463:
 1464:
 1465:

1466: SECTION C: NOTES

1467:

1468:

1469:

1470: CRITERION 1. DIRECTOR OF STUDIES

1471:

1472: 1.1. Where, for good reasons, it is not possible for the Director of
1473: Studies to be employed full-time, another staff member should be
1474: identified as available and willing to carry out the responsibilities
1475: of the DoS as an on site manager in his/her absence. This person
1476: should satisfy the minimum qualifications for a Director of Studies
1477: and should be aware of the responsibilities of the position.

1478:

1479: 1.2 The following is a minimum acceptable position for the
1480: qualifications of Director of Studies:

1481:

1482: Recognised degree and/or formal teaching qualifications plus
1483: postgraduate qualification in TESOL (see note below)

1484:

1485: plus

1486:

1487: at least five years full-time equivalent experience in teaching and/or
1488: administration of TESOL programs at adult or secondary level, as
1489: appropriate.

1490:

1491: Note: For the purposes of this criterion, a Diploma in Education (Dip
1492: Ed) with TESOL specialisation is regarded as a postgraduate
1493: qualification.

1494:

1495:

1496:

1497:

1498:

1499:

1500:

1501: Section C: Notes (continued)

1502:

1503:

1504:

1505: CRITERION 2. TEACHERS

1506:

1507: 2.1. The following is a minimum acceptable position for the
1508: qualifications of teachers:

1509:

1510: A recognised pre-service teaching qualification (See Note 2.4)

1511:

1512: plus or including

1513:

1514: an appropriate TESOL qualification (See Note 2.5)

1515:

1516: OR

1517:

1518: A recognised degree or diploma (See Note 2.6)

1519:

1520: plus

1521:
 1522: at least 800 hours classroom teaching experience (See Notes 2.7 and
 1523: 2.8)
 1524:
 1525: plus
 1526:
 1527: an appropriate TESOL qualification (See Note 2.5)
 1528:
 1529: 2.2. The detailed information necessary for assessing qualifications
 1530: and/or experience of applicant teachers can normally be found in
 1531: course transcripts from universities and statements of service from
 1532: previous employers.
 1533:
 1534: 2.3. There may be isolated cases where the pattern of qualifications
 1535: does not match those outlined here, but where either the teacher or
 1536: the institution believes special consideration should be given on the
 1537: basis of equivalence. Employers are urged to give these cases full
 1538: consideration. If requested, NEAS may be able to give a second
 1539: opinion, provided full documentation is available.
 1540:
 1541: 2.4. "A recognised pre-service teaching qualification" is a formal
 1542: teacher training qualification awarded by an Australian University or
 1543: College of Advanced Education or its overseas equivalent. It may be:
 1544:
 1545: * Diploma of Teaching
 1546: * Bachelor of Education
 1547: * Bachelor degree and Diploma in Education
 1548: * Bachelor degree and Diploma in Educational Studies (TESOL)
 1549: * Bachelor degree and two-year Teaching Certificate
 1550:
 1551: provided
 1552:
 1553: the combined course of study is at least three years full-time (or its
 1554: part-time equivalent) in length and is recognised in its country of
 1555: origin as conferring "trained teacher" status.
 1556:
 1557: Section C: Notes (continued)
 1558:
 1559:
 1560:
 1561: 2.5. "A TESOL qualification", to be deemed appropriate, must result
 1562: from a course of study having at least the following characteristics:
 1563:
 1564: I. content focus on English language, language learning, TESOL
 1565: teaching;
 1566: II. a practical component including at least six hours supervised and
 1567: assessed practice teaching in TESOL;
 1568: III. no less than 100 contact hours in total devoted to (I) and (II)
 1569: above, or the equivalent in Distance Education programs.
 1570:
 1571: Courses in this category may be award courses at Master, Bachelor,
 1572: Graduate Diploma or Graduate Certificate level. They may also be
 1573: non-award courses, provided they have been accredited by an
 1574: appropriate authority. The appropriate authorities accepted by NEAS
 1575: for this purpose include the various Australian State/Territory

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:
1601: * a higher than pass grade in their TESOL qualification;
1602: * documents furnished by previous employers;
1603: * 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:
1617: Section C: Notes (continued)
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:

1631: * a program of regular seminars or workshops conducted in house or in
 1632: conjunction with another institution, each one focusing on an area of
 1633: interest, eg methodology, materials, activities, ideas and insights
 1634: gained from professional reading;
 1635:
 1636: * assistance with attendance at relevant conferences;
 1637:
 1638: * encouragement to pursue further qualifications;
 1639:
 1640: * a library of up to date teacher references, including journals,
 1641: which is accessible to teachers.
 1642:
 1643:
 1644: Criterion 4. Counselling
 1645:
 1646: If the institution appoints a teacher to the role of counsellor, care
 1647: should be taken to reduce the teaching load accordingly.
 1648:
 1649:
 1650:
 1651:
 1652: Section D: Student Services
 1653:
 1654:
 1655: Standard
 1656:
 1657: The institution provides a range of support and pastoral care services
 1658: tailored to the needs of international students who are at varying
 1659: stages of English language proficiency development.
 1660:
 1661:
 1662: Compliance Criteria
 1663:
 1664: 1. Information and orientation
 1665:
 1666: 1.1 Students are provided on arrival with a program of orientation to
 1667: the institution and local community, designed so as to be readily
 1668: understood by them, including advice on health and safety matters,
 1669: attendance obligations, accommodation, counselling and grievance
 1670: resolution procedures.
 1671:
 1672: 1.2 Students are made aware of their obligation to keep the
 1673: institution advised of changes to contact details. (See Note 1.2)
 1674:
 1675: 1.3 Orientation information is made available to students as a
 1676: handbook or manual for ongoing reference.
 1677:
 1678:
 1679: 2. Grievance resolution
 1680:
 1681: 2.1 The institution has a policy and procedures for the prompt and
 1682: fair hearing of student difficulties or grievances, incorporating
 1683: contact details of an appropriate outside agency to which students may
 1684: have independent recourse in the case of unresolved grievances. (See
 1685: Note 2.1)

1686:

1687: 2.2 Students are made aware of the policy and procedures for the

1688: resolution of student grievances in a way that can be readily

1689: understood by them.

1690:

1691: 2.3 The procedures for the resolution of student grievances are

1692: clearly visible in written and/or graphic form on the premises.

1693:

1694:

1695: 3. Counselling and welfare

1696:

1697: 3.1 Students have ready access to a welfare counselling service which

1698: is sensitive to cross cultural issues, respectful of age and gender

1699: sensitivities and able to cross language barriers.

1700:

1701: 3.2 Students are provided with advice and counsel on their academic

1702: progress and further education opportunities.

1703:

1704: 3.3 Support mechanisms are available for students experiencing

1705: difficulties with course work.

1706:

1707:

1708:

1709: 4. Accommodation

1710:

1711: 4.1 The institution provides an accommodation service to assist

1712: students in finding suitable accommodation.

1713:

1714: 4.2 A nominated member of the institution's staff is responsible for

1715: monitoring student satisfaction with accommodation arrangements and

1716: for ensuring the suitability of homestay accommodation and host

1717: families.

1718:

1719:

1720: 5. Accommodation for students under 18

1721:

1722: 5.1 The institution satisfies itself that each enrolled student under

1723: the age of 18 is in a fully supervised accommodation arrangement for

1724: the duration of the course. (See Note 5.1)

1725:

1726: 5.2 The institution provides homestay arrangements for students under

1727: 18 whose parents/guardians have not arranged accommodation

1728: independently and has an appropriate and documented policy covering

1729: the provision of such homestay. (See Notes 5.2 to 5.6)

1730:

1731:

1732: 6. Social and recreational activities

1733:

1734: 6.1 The institution offers a range of social and recreational

1735: activities suited to the age of the students and sensitive to their

1736: cultural backgrounds.

1737:

1738:

1739: 7. Student attendance obligations

1740:

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

1796: * a form of contract with homestay providers
 1797: * onsite inspection of homestays before approval by the institution.
 1798:
 1799: 5.4 The criteria for selection of homestay families must include at
 1800: least the following:
 1801:
 1802: * stability of the arrangement
 1803: * suitability of the family and accommodation for the age and sex of
 1804: the student
 1805: * provision of leisure time activities suited to the age and sex of
 1806: the student
 1807: * appropriate arrangements for the supervision of the student by the
 1808: host family
 1809: * limits on the number of students accommodated in one home.
 1810:
 1811:
 1812: Section D: Notes (continued)
 1813:
 1814:
 1815:
 1816: 5.5 The institution is expected to seek regular and frequent
 1817: feedback from homestay hosts on student progress and welfare and makes
 1818: regular onsite checks.
 1819:
 1820: 5.6 A copy of the institution's homestay policy must be made
 1821: available to the
 1822: parent(s) of the student before enrolment is confirmed.
 1823:
 1824:
 1825: Criterion 7. Student attendance obligations
 1826:
 1827: 7.1 ELICOS students are required by government regulation to
 1828: attend the course for 25 hours per week. They must have a record of
 1829: at least 80% attendance over the course to be allowed to extend their
 1830: visa. The attendance certificate issued to students at the end of the
 1831: course must clearly show the percentage attendance over the course and
 1832: must be endorsed as Satisfactory or Unsatisfactory.
 1833:
 1834: 7.2 Excessive absences or failure to attend on the part of
 1835: ELICOS students must
 1836: be reported in writing to the Department of Immigration and
 1837: Multicultural and Indigenous Affairs.
 1838:
 1839: 7.3 Details of the institution's obligations in respect of
 1840: attendance monitoring and reporting procedures are contained in
 1841: Section 39 of the National Code.
 1842:
 1843:
 1844:
 1845:
 1846: Section E: Curriculum
 1847:
 1848:
 1849: STANDARD
 1850:

1851: The institution's curriculum is purposeful, coherent and documented
 1852: and facilitates the design of teaching programs to meet the needs
 1853: and requirements of students
 1854:
 1855:
 1856: Compliance criteria
 1857:
 1858:
 1859: 1. Courses and timetables
 1860:
 1861: 1.1 All ELT courses in which overseas students are enrolled as
 1862: their primary course are accredited by NEAS and provide students with
 1863: 25 hours per week of professionally supervised instruction. (See Note
 1864: 1.1)
 1865:
 1866: 1.2 Teaching timetables reflect the needs of the course and place
 1867: priority on the achievement of the students' educational goals. (See
 1868: Note 1.2)
 1869:
 1870: 1.3 All professionally supervised instruction is provided by a
 1871: qualified TESOL teacher. (See Note 1.3)
 1872:
 1873: 1.4 Of the 25 hours per week supervised instruction, no less than 20
 1874: are face-to-face teaching, with an average of 15 students per teacher
 1875: per class, and with no more than 18 students in any one class at any
 1876: one time.
 1877:
 1878: 1.5 Of the 25 hours per week supervised instruction, no more than five
 1879: are timetabled for non-face-to-face teaching-learning activities,
 1880: during which the number of students per teacher varies according to
 1881: the nature of the activity.
 1882:
 1883:
 1884: 2. Curriculum design
 1885:
 1886: 2.1 For each course there is a set of specific objectives based on
 1887: the assumed needs of the learners and described in terms of learner
 1888: outcomes.
 1889:
 1890: 2.2 The institution assesses students' achievement on a course
 1891: through the use of assessment instruments which have been developed to
 1892: reflect the specific objectives of the course.
 1893:
 1894: 2.3 Course content is selected on the basis of its appropriateness
 1895: in supporting the achievement of course and lesson objectives.
 1896:
 1897: 2.4 The design of special purpose courses is informed by research
 1898: into the relevant content areas (eg in English for High School
 1899: Preparation, the curriculum and typical educational environment of the
 1900: particular secondary system).
 1901:
 1902: 2.5 All timetabled learning activities, including computerised
 1903: instruction, out-of-class learning and self-study, have a clearly
 1904: stated educational purpose which is intended to further the objectives
 1905: of the course and which is made clear to all students.

1906:

1907: 2.6 A varied range of teaching methods and learning activities is

1908: provided to cater for the diverse learning styles of the students.

1909: (See Note 2.5)

1910:

1911: 2.7 Teaching methods, materials and learning activities take

1912: advantage of the English language environment of the ELICOS

1913: institution.

1914:

1915:

1916: 3. Curriculum documentation

1917:

1918: 3.1 The curriculum for each accredited course is documented in

1919: sufficient detail to enable teachers to plan teaching programs to meet

1920: the needs of each cohort of students.

1921:

1922: 3.2 Written records of what has been taught are retained for

1923: purposes of syllabus review and modification, program coordination and

1924: accountability.

1925:

1926:

1927: 4. Review and evaluation

1928:

1929: 4.1 All courses are kept under active review and modified as

1930: needed, taking into account current professional developments, changes

1931: in student profiles, the views of teachers and feedback from students

1932: and other interested persons.

1933:

1934: 4.2 Each course is subject to end-of-course evaluation, the

1935: results of which inform the conduct of future courses.

1936:

1937:

1938:

1939:

1940: Section E: Notes

1941:

1942:

1943:

1944: Criterion 1. Courses and Timetables

1945:

1946: 1.1 Overseas Students are defined as those students who are

1947: holders of valid student visas.

1948:

1949: Courses should be named in a way that accurately reflects the content

1950: and objectives. The indicative English Language proficiency level may

1951: be expressed as one level (eg Advanced), or a range of levels (eg

1952: Elementary to Advanced).

1953:

1954: Courses which are intended for CRICOS entry (ie available to holders

1955: of student visas) must be identified by name and this name must be

1956: consistently used throughout course documentation and promotional

1957: literature.

1958:

1959: 1.2 Double-shift and staggered start timetables should not be

1960: 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
 1963: 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
 1970: including counselling services.
 1971:
 1972: * There must be a total of 60 minutes break time within each five
 1973: hours of teaching.
 1974:
 1975: * Classes should not be held after 8.30 pm.
 1976:
 1977: * Under the terms of the National Code (Section 13.13) use of premises
 1978: for tuition purposes should not exceed 14 hours per day.
 1979:
 1980: * Professionally qualified staff must be present while premises are
 1981: open for the use of students outside the mandatory 25 hours of
 1982: instruction each week.
 1983:
 1984: 1.3 For details on the qualifications of teachers, refer to
 1985: Section C: Specialist
 1986: Staff.
 1987:
 1996:
 1997: Section E: Notes (continued)
 1998:
 1999:
 2000:
 2001: Criterion 2. Curriculum design
 2002:
 2003: 2.5 In the case of courses including work placement, under the
 2004: terms of the National Code of Practice (Section 13.3), "The
 2005: registration [of a course on CRICOS] ... must not include any period
 2006: of work-based training unless this is necessary in order to obtain the
 2007: course qualification".
 2008:
 2009: For such courses to be accredited, the work placement must be
 2010: integrated into the syllabus as a language learning component. The
 2011: general guidelines for courses including work placement are as
 2012: follows:
 2013:
 2014: * English language learning aims and objectives of the work placement
 2015: component are clearly specified.
 2016:
 2017: * There is language preparation prior to and debriefing following the
 2018: placement.
 2019:
 2020: * The placement is professionally supervised.
 2021:
 2022: * The placement is assessed as part of the course assessment.
 2023:

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
 2080: levels of achievement. (See Note 4)
 2081:
 2082: 4.2 The institution ensures there is consistency between the
 2083: grades or levels awarded and the assessment methodology.
 2084:
 2085:
 2086: 4.3 The end-of-course document includes, or is accompanied by, an
 2087: explanation of the terms used in awarding grades or levels, expressed
 2088: in language meaningful to the wider community.
 2089:
 2090:
 2091: 5. Assessment review
 2092:
 2093: 5.1 The institution has a policy and procedures for the regular
 2094: review and modification of its student assessment and reporting
 2095: procedures.
 2096:
 2097:
 2098:
 2099:
 2100:
 2101: Section F: Notes
 2102:
 2103:
 2104:
 2105: CRITERION 1. PRE-COURSE ENTRY ASSESSMENT
 2106:
 2107: Course applicants should produce evidence of sufficient education to
 2108: cope with a course in English as a Second Language. This should be a
 2109: minimum of four years' secondary schooling or its equivalent, which is
 2110: accepted as evidence of literacy in the mother tongue.
 2111:
 2112: Assessments at the pre-course stage may be made by interview, by
 2113: self-assessment, by standard or non-standard test, or by requiring a
 2114: certain period of prior English language study.
 2115:
 2116: All applicants for ELICOS must be over 18 years of age at the
 2117: commencement of the course. An exception is made where
 2118: parents/guardians have certified in a declaration on the Confirmation
 2119: of Enrolment that they have assessed, and are satisfied with, the
 2120: welfare and support services and arrangements offered by the
 2121: institution and the institution has specific approval under any
 2122: relevant State/Territory legislation to offer courses to students
 2123: under 18 years.
 2124:
 2125:
 2126: CRITERION 2. PLACEMENT ASSESSMENT
 2127:
 2128: Assessment instruments and procedures for placing students in class
 2129: after arrival may be developed in house or acquired commercially.
 2130:
 2131:
 2132: CRITERION 4. SUMMATIVE ASSESSMENT
 2133:

2134: Institutions should retain documentary evidence to support any claims
 2135: that a certificate is accepted at another institution as the
 2136: equivalent of part of another course, or that it fulfils a pre-entry
 2137: requirement to another course.
 2138:
 2139:
 2140:
 2141:
 2142: Section G: Materials and Equipment
 2143:
 2144:
 2145: Standard
 2146:
 2147: The institution maintains a stock of material resources which is aimed
 2148: at enhancing the achievement of course objectives, is adequate for
 2149: the number of students and teachers and encourages diversity
 2150: in learning activities and teaching methodologies. The
 2151: materials stock is appropriately organised and
 2152: regularly reviewed .
 2153:
 2154:
 2155: Compliance Criteria
 2156:
 2157: 1. Teaching-learning materials
 2158:
 2159: 1.1 A stock of teaching-learning materials is maintained in
 2160: adequate supply for the number of students enrolled and appropriate to
 2161: the level and type of courses offered.
 2162:
 2163: 1.2 Teaching-learning materials cover a range of media, allowing
 2164: for variety in learning activities and teaching methodologies.
 2165:
 2166: 1.3 The stock of teaching-learning materials is regularly
 2167: reviewed, replenished and updated in accordance with changes in course
 2168: offerings and student profiles and in the light of new developments in
 2169: TESOL theory and practice.
 2170:
 2171: 1.4 Where a program of student self-access or self-study is
 2172: offered, materials are selected, grouped and packaged so as to be fit
 2173: for their purpose and adequate for the number of students using the
 2174: program, taking into account differing rates of progress and learning
 2175: styles.
 2176:
 2177: 1.5 The stock of teaching-learning materials includes materials
 2178: developed by teachers for classroom and individual student use.
 2179:
 2180: 1.6 Materials are stored, packaged and/or coded to optimise use
 2181: and access.
 2182:
 2183:
 2184: 2. Teacher reference materials
 2185:
 2186: 2.1 There is a reference library of books, journals, and other
 2187: publications for teachers reflecting contemporary knowledge of the
 2188: theory and practice of TESOL.

2189:

2190: 2.2 Teachers are encouraged to make use of the reference library

2191: for course and lesson planning and their own professional development.

2192:

2193:

2194:

2195: 3. Teaching-learning equipment

2196:

2197: 3.1 The institution provides access on the premises to a range of

2198: educational technology that supports its teaching-learning programs

2199: and provides scope for diverse teaching methodologies.

2200:

2201: 3.2 Electronic hardware for classroom use, eg audio and video

2202: players and TV monitors, are sufficient in number and appropriate in

2203: type to meet the needs of the teaching program.

2204:

2205: 3.3 Students have access to high quality audioactive equipment

2206: for individual use.

2207:

2208: 3.4 Facilities for duplicating are available on the premises for

2209: the use of students and teachers.

2210:

2211: 3.5 Equipment for the use of students in self-study areas, such

2212: as self-access centres, resource centres, computer and language

2213: laboratories, is organised so as to facilitate access and use by

2214: individual students.

2215:

2216: 3.6 Teaching-learning equipment is maintained in good working

2217: order.

2218:

2219:

2220: 4. Copyright

2221:

2222: 4.1 The institution has documented policies governing the

2223: acquisition and use of materials, software and intellectual property

2224: which are in accordance with Australia's copyright laws. (See Note 4)

2225:

2226: 4.2 Policies and procedures relating to the use of material

2227: subject to copyright are promulgated to all staff.

2228:

2229:

2230:

2231:

2232: Section G: Notes

2233:

2234:

2235:

2236: CRITERION 4. USE OF COPYRIGHT MATERIAL

2237:

2238: Course materials may include items that are copied from printed,

2239: audio-visual or online sources. Copying materials from any of these

2240: sources will often involve reproducing items protected by copyright.

2241: A number of licences are available which permit institutions to

2242: reproduce copyright material for educational purposes lawfully. All

2243: institutions must obtain the relevant licences before any copying of

2244: copyright material is undertaken.
 2245:
 2246: Information about licences can be obtained by contacting the following
 2247: organisations:
 2248:
 2249: For television programs (including cable and satellite) and radio
 2250: broadcasts, contact:
 2251:
 2252: Screenrights
 2253: P O Box 1248
 2254: Neutral Bay NSW 2089
 2255: Tel (02) 9904 0133
 2256: Fax (02) 9904 0498
 2257: Email: licensing@screen.org
 2258: www.screen.org
 2259:
 2260: For performance of music and/or printed music, contact:
 2261:
 2262: APRA/AMCOS
 2263: Locked Bag 3456
 2264: St Leonards NSW 2065
 2265: Tel (02) 9935 7900
 2266: Fax (02) 9935 7999
 2267: www.apra.com.au
 2268: www.amcos.com.au
 2269:
 2270: For printed material from books, publications and from online sources,
 2271: contact:
 2272:
 2273: Copyright Agency Limited (CAL)
 2274: Level 19, 157 Liverpool Street
 2275: Sydney NSW 2000
 2276: Tel (02) 9394 7600
 2277: Fax (02) 9394 7601
 2278: Email: licence@copyright.com.au
 2279: www.copyright.com.au
 2280:
 2281:
 2282:
 2283: Section H: Recruitment and Promotion
 2284:
 2285:
 2286: Standard
 2287:
 2288: All action in recruiting students and promoting the institution is
 2289: conducted
 2290: in an ethical and responsible manner. All promotional material is
 2291: comprehensive, up to date and accurate and includes sufficient
 2292: information about the institution, its programs, services,
 2293: resources and facilities to enable prospective students
 2294: to make an informed choice.
 2295:
 2296:
 2297: Compliance criteria
 2298:

2299: 1. Recruiting

2300:

2301: 1.1 The institution ensures that it has informed itself on the

2302: probity and ethical standards of any recruiting agents with whom it

2303: has agreements.

2304:

2305: 1.2 The institution takes steps to ensure its agents are

2306: adequately informed about the regulations and guidelines relevant to

2307: students and providers of English language teaching programs.

2308:

2309: 1.3 The institution assumes responsibility for monitoring its

2310: recruiting agents and makes every reasonable effort to ensure that its

2311: agents act at all times in the best interests of the student and the

2312: institution.

2313:

2314:

2315: 2. Promoting the institution and its facilities

2316:

2317: 2.1 Care is taken to ensure that text and visuals used in

2318: promotional materials are an accurate reflection of the institution,

2319: its location, resources and facilities.

2320:

2321: 2.2 The name of the accrediting agency is unambiguously stated.

2322: (See Note 2)

2323:

2324: 2.3 Any reference in promotional material to the profile and

2325: qualifications of teaching staff is an accurate reflection of the

2326: existing situation.

2327:

2328: 2.4 Any references to support facilities such as language and

2329: computer laboratories, resource centres and libraries are accurate.

2330:

2331:

2332: 3. Pre-enrolment promotion of courses

2333:

2334: 3.1 Course descriptions in pre-enrolment information include a

2335: general

2336: description of course content, teaching materials, teaching methods

2337: and assessment methods used.

2338:

2339: 3.2 Course names, lengths, levels and hours of tuition are

2340: stated accurately

2341: and consistently throughout the promotional literature.

2342:

2343:

2344:

2345: 3.3 Course descriptions clearly distinguish between courses which

2346: are registered and available to holders of student visas and any

2347: non-registered courses which are not available to holders of student

2348: visas as their principal course. (See Note 3)

2349:

2350: 3.4 Any claims that courses meet the entry requirements of another

2351: institution or are accepted for equivalence by another institution are

2352: made with the written agreement of that institution.

2353:

2354:

2355: 4. Providing pre-course information about fees, charges and likely

2356: costs

2357:

2358: 4.1 All course fees and charges are clearly and accurately stated

2359: in promotional materials and pre-course information for students.

2360:

2361: 4.2 Prospective students are provided with information about other

2362: likely costs associated with the course of study, including the cost

2363: of any compulsory text books, uniforms, residential accommodation and

2364: cost of living in Australia.

2365:

2366: 4.3 Prospective students are provided with accurate information

2367: about the Australian Government's regulation concerning Overseas

2368: Student Health Cover. (See Note 4)

2369:

2370:

2371: 5. Refund and Cancellation policy

2372:

2373: 5.1 The institution's refund policy and conditions of enrolment

2374: are clearly visible on the form of application for enrolment, together

2375: with a space for the signature of the student (or parent/guardian

2376: where the student is under 18) as evidence that they have understood

2377: and accepted the entry and refund conditions.

2378:

2379: 5.2 The institution's published refund policy clearly identifies

2380: any compulsory fees which are non-refundable, and any amounts to be

2381: refunded in the event of cancellation by either party. (See Note 5.)

2382:

2383:

2384: 6. Providing pre-course information about welfare, support,

2385: recreational services and the local environment

2386:

2387: 6.1 Prospective students are provided with accurate information on the

2388: local area, the types of residential accommodation available to

2389: students on and off campus and the kinds of assistance provided by the

2390: institution in finding accommodation.

2391:

2392: 6.2 All references in pre-course information to welfare, counselling

2393: and social/recreational programs offered to students are accurate.

2394:

2395:

2396:

2397:

2398: 7. Providing pre-course information about admission procedures

2399:

2400: 7.1 Pre-enrolment information clearly sets out procedures for

2401: seeking enrolment, paying fees and applying for a student visa. (See

2402: Note 7)

2403:

2404: 7.2 Any specific admission requirements in terms of English

2405: language proficiency, prior study, qualifications or experience, are

2406: clearly indicated in pre-enrolment information.

2407:

2408:

2409: 8. Avoiding misleading, ambiguous, or exaggerated claims in
 2410: promotional materials.
 2411:
 2412: 8.1 Care is taken to avoid inaccurate or misleading photographs,
 2413: or exaggerated claims on such matters as likely progress and levels of
 2414: attainment, recognition of certificates and awards, further study
 2415: opportunities, qualifications of teaching staff.
 2416:
 2417: 8.2 Care is taken to avoid any statement implying that the
 2418: institution is approved or accredited by the Australian Government.
 2419:
 2420: 8.3 A nominated officer of the institution is responsible for
 2421: ensuring all promotional material and pre-course information for
 2422: students is accurate, comprehensive, up to date and clear.
 2423:
 2424:
 2425:
 2426:
 2427: Section H: Notes
 2428:
 2429:
 2430:
 2431: Criterion 2. Promoting the institution and its facilities
 2432:
 2433: The agency providing ELT institutional accreditation in Australia is
 2434: the National ELT Accreditation Scheme (NEAS).
 2435:
 2436: Although ELICOS providers must be registered by the Department of
 2437: Education, Science and Training, the Australian Government
 2438: specifically disallows advertising by any provider stating or implying
 2439: that the provider is approved or accredited by the Australian
 2440: Government, or that the Australian Government will guarantee the
 2441: provider's debts to students, or that the quality of a provider's
 2442: services is guaranteed by the Australian Government. For more
 2443: information, see the DEST website.
 2444:
 2445:
 2446: CRITERION 3. PROMOTING THE COURSES
 2447:
 2448: Institutions may, at their discretion, offer part-time courses, study
 2449: tours, or other short-term package arrangements, including an ELT
 2450: component (which may be NEAS accredited). These are outside the
 2451: definition of ELICOS and are not available as their main course to
 2452: holders of student visas.
 2453:
 2454:
 2455: Criterion 4. Providing pre-course information about fees, charges
 2456: and likely costs
 2457:
 2458: Holders of student visas are required by regulation to have health
 2459: insurance. The Overseas Student Health Cover (OSHC) arranged by
 2460: Medibank Private is considered by the Australian Government to meet
 2461: this requirement. Providers of ELICOS must ensure that OSHC is
 2462: arranged for students coming to Australia and that cover is paid and
 2463: effective from their date of arrival in Australia.

2464:
 2465:
 2466: CRITERION 5. REFUND AND CANCELLATION POLICY
 2467:
 2468: The following is the minimum acceptable position for a refund and
 2469: cancellation policy:
 2470:
 2471: * The institution's published refund policy clearly identifies any
 2472: compulsory fees which are non-refundable.
 2473:
 2474: * The institution's published refund policy makes clear the amount of
 2475: prepaid fees (if any) to be refunded if the student cancels before the
 2476: course begins.
 2477:
 2478: * The institution's published refund policy makes clear the amount of
 2479: prepaid fees (if any) to be refunded if the student cancels after the
 2480: course begins.
 2481:
 2482: * The institution's published refund policy clearly states the amount
 2483: of prepaid fees to be refunded (or other arrangement) if the
 2484: institution is unable to deliver the course for which the student has
 2485: enrolled.
 2486:
 2487:
 2488:
 2489: * The institution's refund policy makes it clear when and how the
 2490: student should apply for a refund.
 2491:
 2492: Under the terms of the National Code the refund policy "must include
 2493: the statement that "This agreement does not remove the right to take
 2494: further action under Australia's consumer protection laws". It must
 2495: also make clear that "the registered provider's dispute resolution
 2496: processes do not circumscribe the student's right to pursue other
 2497: legal remedies". For details refer to the National Code, Sections
 2498: 43-44 and Sections 27-32 of the ESOS Act 2000.
 2499:
 2500:
 2501: Criterion 7. Providing pre-course information about admission
 2502: procedures.
 2503:
 2504: It is a requirement under the National Code and the ESOS Act 2000 that
 2505: students be made aware that personal information may be made available
 2506: by the provider to Commonwealth and State agencies and the ESOS
 2507: Assurance Fund Manager (Section 51 of the National Code).
 2508:
 2509:
 2510:
 2511:
 2512: 50
 2513:
 2514: ELICOS Accreditation Handbook - February 2002

APPENDIX 9: INTRODUCTORY LETTER TO COLLEGES

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.

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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 (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.

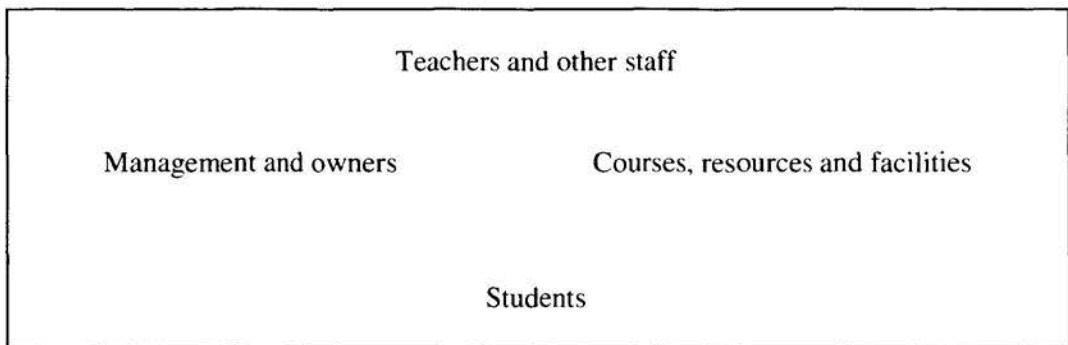
APPENDIX 11: GUIDELINES FOR PARTICIPANTS

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.



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.

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

APPENDIX 12: REPORT ON ACTA WORKSHOP (Crichton 2002)

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 have 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 emphasise 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 create 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.

Participants and relationships represented in ELT promotional materials

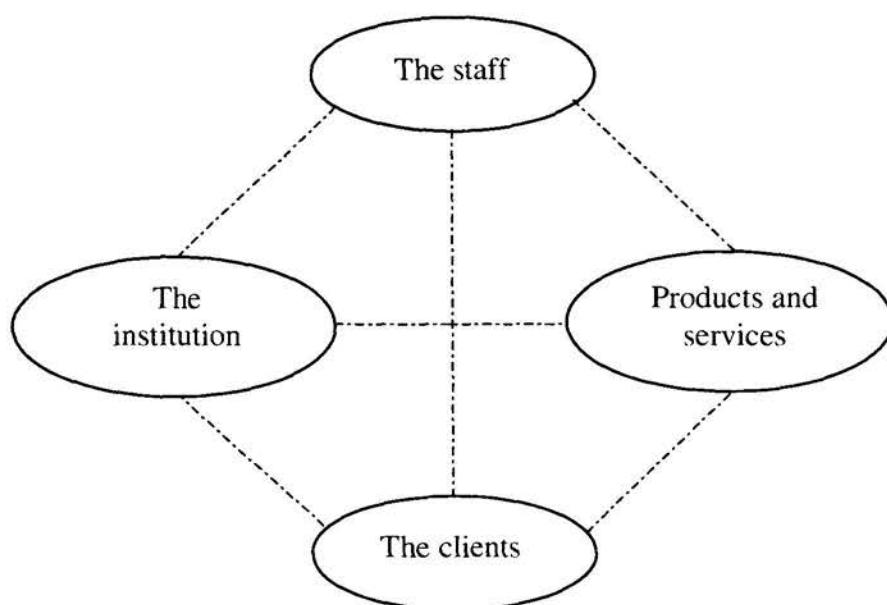


Figure 1

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 'attractor' 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 'attractors' and 'providers' of how commercial and pedagogic interests shape the practices of ELT institutions.