

Senate Education, Employment and Workplace Relations Committee

Inquiry into the Welfare of International Students

**Submitted by the National ELT Accreditation Scheme Limited
(NEAS)**



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1. Introduction

This submission relates to item (c) *any other related matters*. NEAS wishes to comment on monitoring and enforcement of the *ESOS Act 2000*.

The *ESOS Act 2000*, through the *National Code of Practice (2007)*, stipulates minimum requirements for the welfare of international students through *Standard 6 – Student support services*. The existing legislation is comprehensive in addressing matters relating to student welfare and additional legislation is not warranted.

State and Territory Registering Authorities and the Australian Government have responsibility for ensuring compliance with the *National Code of Practice*. However, improvements in current arrangements are needed in order to keep the requirements in check.

2. Key gaps in the current system

Key issues apparent within the current monitoring framework relating to the *ESOS Act 2000*:

- monitoring processes are not nationally consistent
- the legislation is not enforced with sufficient rigour and regularity

Government assessments of providers in relation to the *National Code of Practice* vary from one jurisdiction to another in:

- how a provider's services to international students are actually assessed
- how often assessments are carried out (some states/territories conduct onsite inspections only once every five years)
- the qualifications, experience and training required of assessors

3. Recommendations

Develop a nationally consistent monitoring framework around current legislation.
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Ensure prompt and effective enforcement of compliance.
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The above measures would greatly enhance the delivery of services to international students.

4. Rationale

Legislation and regulations are rendered meaningless without an appropriate monitoring structure. To be truly effective, the monitoring system needs to be:

- nationally consistent in how providers are assessed
- nationally consistent in frequency of provider assessments
- fit for purpose – assessors should be knowledgeable in the area they assess

Without the above elements any monitoring system would remain fragmented.

5. A model that works

NEAS is an industry based model that has operated successfully in accrediting and quality assuring English language ('ELICOS') centres for nearly two decades. The key difference between NEAS and the *National Code of Practice* rests not so much in the standards themselves but in a monitoring framework which:

- is consistently applied across states/territories and provider type
- has a system of annual monitoring in place
- is fit for purpose – assessors are professionals in the field

6. General observation

Much of the focus of government auditing of providers has concentrated on requirements such as student attendance rather than the standard of education delivery and welfare arrangements.

The focus needs to be on the quality of the delivery of educational programs and related student services rather than migration and administrative requirements.

Conclusion

Government regulation to ensure a level of welfare service for international students exists. However, clearer nationally consistent and rigorous monitoring frameworks need to be established to effectively enforce legislation.

Industry based schemes such as NEAS have worked successfully for many years and serve as a model for ongoing monitoring of international education providers.

NEAS welcomes any invitation to be heard before the committee to speak further on this matter.

Appendix A

NEAS:

The National ELT Accreditation Scheme Limited (NEAS) is a self-funded not-for-profit internationally recognised accreditation scheme that operates in liaison with both governments and industry to maintain quality standards for the benefit of international students studying English across Australia. The scheme was established in 1990 by the English language teaching industry at the request of the federal government of the time.

It is common practice for language centres worldwide to offer accommodation and activity services as part of the whole learning experience and therefore important for such services to be offered by Australian English Language Teaching (ELT) centres in order to compete within the large and well established global market of English teaching. Unique to this field is the fact that it caters *only* to international students. NEAS' standards for the sector were developed purely with these facts in mind¹. Since it began operating, NEAS has maintained an effective regular check on the delivery of ELT and welfare services to international students across Australia (also referred to as the ELICOS sector) through a nationally consistent monitoring framework².

It is important to note that NEAS sets standards for the delivery of English, but does not assess students' ability in English, nor does NEAS set English entry requirements for further study. NEAS' standards and criteria relate to the following areas: *Management and Administration; Premises; Specialist Staff; Student Services; English Language Programs and Assessment; Educational Resources and Equipment; Promotion and Student Recruitment; and Younger Students*. While all the areas noted are considered important to the quality assurance of the industry, of significance to this submission is the area relating to *Student Services*. However, current issues within international education do not appear to stem from matters relating to the welfare of students alone. The delivery of education programs and related services to international students needs to be considered as a whole.

Industry monitoring framework – NEAS example:

The welfare of international students is central to NEAS' monitoring framework:

a) **Accreditation and continuous monitoring:**

- i. an initial rigorous desk audit and a cycle of annual desk audits of all aspects of delivery of English to international students including:
 - *Policy and procedures for the orientation provided to students*
 - *Complaints and appeals procedures in the form in which they are made known to students*
 - *Student manual (printed and/or online)*
 - *Policy and procedures for provision of accommodation assistance*
 - *Policy and procedures for the provision of a homestay service*
 - *Policy and procedures for using a homestay agency*
 - *Contract between the ELT centre and the homestay agency;*
- ii. Onsite inspections every 12 to 18 months by up to two trained professionals inclusive of interviews with those responsible for the above plus a check on the NEAS' Standard D:3.1 *The ELT centre informs students of available social and recreational activities suited to their age and sensitive to their cultural backgrounds;*

¹ Refer to www.neas.org.au/accreditation/standards.php

² Ref0er to [www.neas.org.au/accreditation/Guide to NEAS Accreditation.pdf](http://www.neas.org.au/accreditation/Guide%20to%20NEAS%20Accreditation.pdf)

Appendix A

b) Qualified and trained assessors/auditors

NEAS assessors/auditors must meet specific qualification requirements, have significant experience within the ELT field and undertake annual face to face moderating activities in relation to their role as onsite inspectors. They are supported by scheduled teleconferences and regular newsletters relating to onsite assessments. The combination of a solid professional and educational background in delivering services to international students plus meeting training requirements provides for national consistency and a professional voice in assessing what services to international students can be considered as 'suitable' and 'appropriate' and therefore meeting standards.

c) Professional support for the industry

NEAS holds an annual conference for the management staff of ELT centres to assist in maintaining standards of delivery through workshops and sessions aimed at professional enhancement with student welfare related presentations a frequent part of the overall program. NEAS also promotes excellent initiatives such as The Rainbow Guide – a DEEWR funded ISANA produced orientation manual and pre-arrival handbook which providers can brand and customise to suit their students' needs – by informing all providers of the guide with links to it on NEAS' website. NEAS also has a Mentoring service for providers that are newly established and request it or if NEAS feels the need to assign a Mentor – a trained NEAS panellist.

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