

9 August 2009

Senate Committee Inquiry into the Welfare of International Students – English Australia submission

English Australia (EA) welcomes this Senate Committee Inquiry into the Welfare of International Students.

The Senate Committee with responsibility for Education played an important role during the original passage and early reviews of the Education Services for Overseas Students (ESOS) Act. International education owes much to the previous Committee Chair, the late former Senator Olive Zakharov, former Senator John Tierney and many others who reviewed successive amendments of the legislation governing the treatment and protection of overseas students in this country.

Previous Senate Committees found, as undoubtedly will this inquiry, that while the legislative framework is basically sound, enforcement and resources allocated to enforcement were and are sadly deficient. Since the ESOS legislative framework was introduced in 1991, the industry has been through a number of reviews with a regulatory focus. Despite this, it seems that core issues have not been addressed. The following extract from the Report from the last review “Evaluation of the ESOS Act 2000” (released in May 2005) is just as relevant today as it was then.

“The Australian industry cannot afford to mark time if it is to retain its competitive edge. Indeed, there is mounting evidence that this edge is beginning to fray. The evaluation team argues that the next stage of the evolution of the Australian education export industry must maintain the concentration of quality as its distinguishing mark, even if that is at the expense of quantity. This means quality in the educational outcomes a bona fide student can obtain and quality in the student's experience while in our country. It also means recognition that this is a whole-of-nation, whole-of-industry enterprise where government works in partnership with industry stakeholders.” (page xxxvi)

English Australia welcomes this Senate Committee inquiry as an opportunity for both governments and education providers to go beyond a purely regulatory approach and focus on developing a strategic vision for this important industry.

A successful international education industry has a critical contribution to make to Australia's future on a range of levels beyond its economic contribution. Given its importance, English Australia's position is that an effective alliance is needed between government and industry to formulate a comprehensive national strategy to ensure the industry's development and long term sustainability. Rather than the regulatory focus offered by the forthcoming ESOS review, we need to take this opportunity to emerge with a strategic vision for international education that will ensure a sustainable future.

English Australia, formerly known as the ELICOS Association, is the national professional association and peak body for the ELICOS sector (English Language Intensive Courses for Overseas Students), representing over 120 colleges delivering English language programs specifically to overseas students. Currently international education is Australia's third largest source of export income, with the ELICOS sector accounting for about twelve per cent, over \$1.8 billion per annum out of a total of more than \$15 billion for international education as a whole.

In 2008, of the sectors which comprise the international education industry, vocational education accounted for 33 per cent of commencing students, higher education 24 per cent and schools 4 per cent. 31 per cent of commencing overseas students holding student visas in Australia in 2008 were undertaking English language courses (99,344 students). In addition a further 62,770 overseas students undertook English language courses using other visas, primarily Visitor or Working Holiday visas. Over 80 per cent of overseas English language students study programs with English Australia member colleges.

The ELICOS sector has a 100% international focus as it provides courses only to students from overseas and has no domestic education focus. As such, it is uniquely positioned to provide comment on the needs of international students and international education more broadly. Overseas students who have little or no English when they arrive are particularly vulnerable. Hence EA member colleges have established programs and strategies in place to support students as they settle into study and living in Australia, including comprehensive accommodation placement services with a large homestay component.

Homestay has proved to be an excellent way of enhancing the overseas student experience that benefits both the students and the Australian families that host them. English Australia would be happy to arrange for the Committee to visit one or more member colleges to see conditions first hand and speak to students and staff. In addition, English Australia (with funding support from DEEWR) is currently working with the International Graduate Insight Group to run a benchmarking project to investigate the student experience within the ELICOS sector survey with the aim of identifying strengths and weaknesses and highlighting priority areas where colleges can focus their resources and make a difference to student satisfaction. 58 ELICOS colleges are participating in the project which should be completed in September 2009. EA will be pleased to share the project findings with the Committee when they become available.

English Australia appreciates the opportunity to make this submission to the Senate Committee. We would also welcome the opportunity to appear before the Committee at a public hearing if required, and would be pleased to arrange a site visit to a member college.

yours sincerely



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Executive Director
English Australia

English Australia



Submission to
the Senate Committee Inquiry
into the Welfare of International Students

August 2009

English Australia – leading, supporting and representing the international English language industry in Australia

www.englishaustralia.com.au

Inquiry – Terms of Reference

On 17 June 2009, the Senate referred the following matter to the References Senate Standing Committee on Education, Employment and Workplace Relations for report by 16 November 2009:

(a) the roles and responsibilities of education providers, migration and education agents, state and federal governments, and relevant departments and embassies, in ensuring the quality and adequacy in information, advice, service delivery and support, with particular reference to:

- (i) student safety,
- (ii) adequate and affordable accommodation,
- (iii) social inclusion,
- (iv) student visa requirements,
- (v) adequate international student supports and advocacy,
- (vi) employment rights and protections from exploitation, and
- (vii) appropriate pathways to permanency;

(b) the identification of quality benchmarks and controls for service, advice and support for international students studying at an Australian education institution; and

(c) any other related matters.

Executive Summary

The Current Context

The international education industry in Australia has seen extraordinary growth. Neither governments nor industry have taken a leadership role in understanding, analysing and responding to this growth. The industry has outgrown the resources allocated to ensuring the quality of the student experience and the pressure placed on the current infrastructure has led to the issues that confront us.

The current context provides both governments and industry with the opportunity to re-position the international education industry to not only deliver quality outcomes to students, but also to meet the broader goals of Australia in the future.

Key Points

English Australia wishes to make the following key points:

1. The Welfare of International Students

The student experience in the broadest sense has always been central to the focus of ELICOS providers. English Australia abhors violence, racism and discrimination in any shape or form and works with its member colleges to minimise the exposure of international students to any circumstance that might put them at risk, however acknowledges that further work is needed.

English Australia calls for the Senate Committee to acknowledge the work that has been done by the international education industry to enhance the student experience.

2. The Need for a Strategic Approach

English Australia is concerned that the context for this inquiry will result in a narrow focus on the student experience. While the student experience is central to what we do, there are many issues that need to be taken into account when considering the contribution of the industry to Australia and the place of international education in the future.

English Australia calls for a strategic review of international education along the lines of the recent Jackson review for Tourism and Bradley review for Higher Education.

3. A Balanced View – understanding the issues

Australia's international education industry is recognised worldwide as a leader in developing a framework for international education that focuses on delivering quality outcomes for students. English Australia acknowledges that there are issues requiring attention, however believes that these issues have come about as a result of a particular set of circumstances and that it is therefore important for these issues to be considered within the broader context of the international education industry.

English Australia calls for the inquiry to take into account the broader context of international education when considering current issues.

English Australia believes that it is timely to review the links between education and migration.

4. Legislation / Regulation

Australia already has a world leading legislative framework for international education. Rather than needing more or 'stronger' regulation, what is needed is a focus on ensuring that the responsible authorities have the legislative powers, the will to act and the resources that are required to enforce the legislation that already exists.

English Australia calls for the forthcoming ESOS review to focus on enforcement of the existing legislation.

Within the context of the establishment of TEQSA, English Australia believes it is important that the quality assurance framework for each sector be examined separately to ensure that a national focus is taken and standards are ensured.

5. Investment

The international education industry has only been in existence for two decades and yet in its submission to the House of Representatives Economics Committee *Servicing our Future* inquiry, the Treasury described the industry as "a success story in the Australian economy". The international education industry has, however, been a victim of its own success. As long as the industry has grown and produced positive outcomes, commonwealth and state/territory governments have been happy to reap the economic rewards without investing in the infrastructure required to ensure a sustainable future for the industry.

English Australia calls for investment by governments in this critical industry to be lifted to a level commensurate with that for other major industries.

6. Education Agents

Education agents play an important role in providing advice to students considering study in Australia.

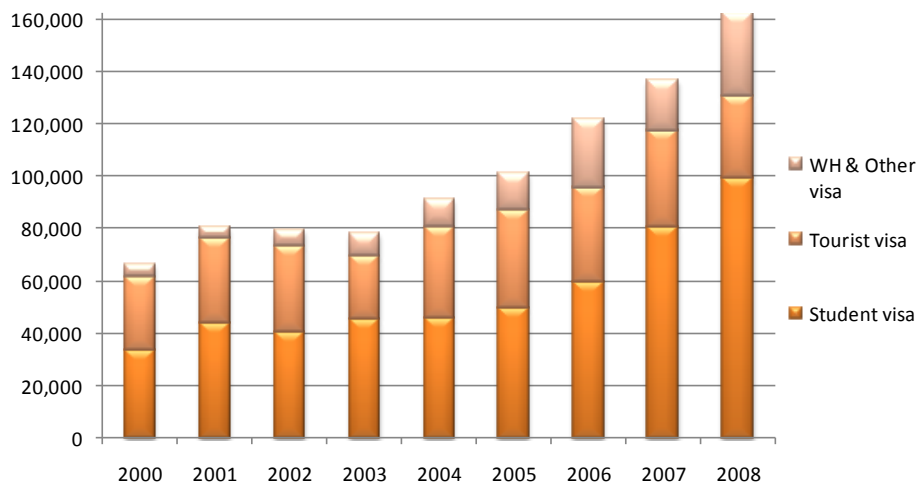
English Australia calls for agents to be viewed as valued partners with a key role to play in advising potential students and for creative approaches to be taken to managing the agent role.

The Current Context

The international education industry in Australia has seen extraordinary growth.

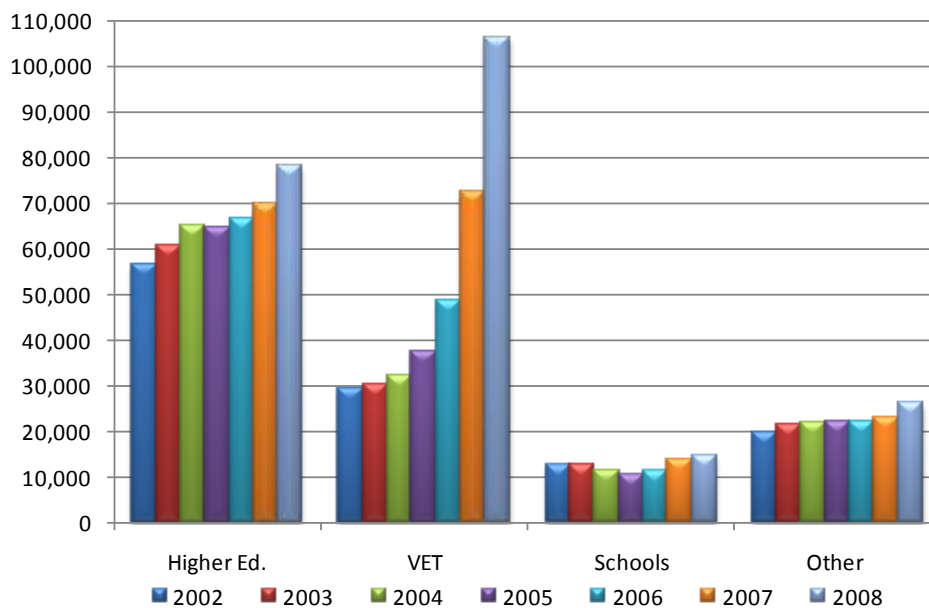
For the ELICOS sector this growth has been spread over the last five years, with numbers of commencing ELICOS students doubling over this period of time from 80,000 in 2003 to over 160,000 in 2008.

Fig 1. ELICOS commencements (all visas)



The Higher Education sector has grown steadily in the three years since 2005, whilst the VET sector has seen extraordinary growth, with numbers of international students more than doubling in only two years, from 48,488 in 2006 to 106,180 in 2008.

Fig 2. Other sector commencements (student visas)



There has been a distinct lack of national leadership in coordinating a government/industry approach to analysing the drivers for this growth, identifying the infrastructure and resource needs to support the growth and understanding the potential impact on both the educational experience and the student experience outside the classroom/campus within the local community.

It is this growth and the lack of a coordinated, strategic response that has led to the current issues relating to student welfare and the quality of the student education experience and outcomes rising to the surface. The current context provides both governments and industry with the opportunity to re-position the international education industry to not only deliver quality outcomes to students, but also to meet the broader goals of Australia in the future.

1. The Welfare of International Students

The focus of this inquiry is the welfare of international students. The student experience in the broadest sense has always been central to the focus of ELICOS providers. English Australia abhors violence, racism and discrimination in any shape or form and works with its member colleges to minimise the exposure of international students to any circumstance that might put them at risk, however acknowledges that further work is needed.

English Australia calls for the Senate Committee to acknowledge the work that has been done by the international education industry to enhance the student experience.

Australian society has changed over recent years and whilst we once might proudly have claimed that Australia was a safe country, as it still might be when compared to many of the countries from which our students come, it is increasingly evident that we need to ensure our students are provided with the knowledge and support they need to ensure they have a positive experience while they are in Australia.

That responsibility is shared by all stakeholders, with agents playing a key role in providing information and advice to students before they arrive in Australia, education providers accountable for the totality of the student experience and the quality of the education outcomes, and governments responsible for ensuring appropriate policy frameworks are in place and for enforcing legislation.

A focus on the totality of the student experience has always been viewed as critical by English Australia and the ELICOS sector ever since the sector established a significant profile, beginning with delivering English language programs to Japanese tourists in the 1980's and following on from the experience gained delivering academic English programs to scholarship students under the Colombo Plan.

In the 1980's, the Australian ELICOS sector launched into a space dominated by the UK and the USA and realised very early on that the only way to compete on the global stage was to deliver a quality "language travel" experience that would ensure word of mouth recommendation. Reputation risk was a major issue for a country without a recognised accreditation regime for English language training for overseas students and English Australia took a major step forward by establishing a national industry accreditation body,

the National ELT Accreditation Scheme (NEAS) in 1990. The NEAS standards did not merely focus on curriculum, educational resources and teacher qualifications and skills. Standards were established for initial orientation, student welfare, counselling, accommodation placement, social and recreational activities etc.

At that time English Australia was also well aware of the reputation risk posed by potential college closures and established a student placement scheme for ELICOS colleges that was subsequently copied by the ESOS regulatory framework as a mechanism to provide protection to international students as consumers. English Australia has since focused on providing leadership in raising educational, professional and ethical standards within member colleges (see below).

International student welfare will not only benefit from strategies developed and implemented by government, providers and peak bodies to address specific welfare issues, it will also benefit from the broader focus recommended by English Australia through the key points addressed in this submission.

2. The Need for a Strategic Approach

English Australia is concerned that the context for this inquiry will result in a narrow focus on the student experience. While the student experience is central to what we do, there are many issues that need to be taken into account when considering the contribution of the industry to Australia and the place of international education in the future.

English Australia calls for a strategic review of international education along the lines of the recent Jackson review for Tourism and Bradley review for Higher Education.

This inquiry has been initiated as a result of recent media attention focusing on international student safety and welfare issues. Whilst not wishing to minimise the importance of these issues, English Australia believes it is critical for the inquiry to take a step back from immediate questions relating to the experience of the international student and take a more holistic view of the international education industry.

We should not only be looking at a student strategy, aiming to enhance the experience of international students by strengthening existing capabilities and improving infrastructure, we should also be focusing on an industry development strategy, aiming to ensure the long term sustainability and development of the industry.

What is Australia's overarching policy goal for international education? Have we identified what this is? Is there a clear articulation and understanding of this policy goal across all key stakeholders? Do we have a strategic plan for achieving this policy goal that is endorsed by both governments and industry and has clear ownership by all stakeholders?

There needs to be recognition of the importance of the international education industry to Australia and high level government focus and oversight via a dedicated Parliamentary Secretary.

Clear parallels can be drawn with the tourism industry. On 8 May 2008, the Hon Martin Ferguson AM MP, Minister for Tourism, announced the development of a National Long Term Tourism Strategy (the Strategy).

“The Strategy will assist the Government in achieving its **overarching policy goal**, which is to maximise the net economic benefit of the tourism industry to the Australian economy. The Strategy will **provide a long-term vision** for the tourism industry and **establish the basis for consistent long-term policy engagement with the tourism industry by successive governments**. The Government has signalled that the development of the Strategy will be based on the application of a rigorous economic and industry policy framework. The primary focus of the Strategy will be on the development of the productive capacity or supply-side of the tourism industry. The Strategy, to be completed in mid-2009, will be developed in close consultation with the tourism industry and all levels of government.”

English Australia believes that a strategic approach similar to this is required for international education. The recent Bradley review of higher education touched on certain aspects of international education, however a separate review is warranted. International education crosses all sectors of education (higher education, English language, vocational education, schools) and intersects with other areas of government including tourism, trade and diplomacy.

The size and importance of the international education industry is sufficient to justify a dedicated strategic review.

English Australia believes that it is important for governments and education providers to not just react to the specific issues emerging at the current time, but to be visionary in re-conceptualising the international education industry.

The recently released Jackson report, informing the National Long Term Tourism Strategy, calls for a national strategy, an industry development body, greater investment in the industry by government, increased industry research and better data collection, professional development of industry staff members, improved and streamlined regulation between the commonwealth and the states, and a greater emphasis on leadership – clear parallels with what is required in international education.

3. A Balanced View – understanding the issues

Australia’s international education industry is recognised worldwide as a leader in developing a framework for international education that focuses on delivering quality outcomes for students. English Australia acknowledges that there are issues requiring attention, however believes that these issues have come about as a result of a particular set of circumstances and that it is therefore important for these issues to be considered within the broader context of the international education industry.

English Australia calls for the inquiry to take into account the broader context of international education when considering current issues.

English Australia believes that it is timely to review the links between education and migration.

The inquiry seeks to consider the various facets of the international student experience. If the ESOS legislative framework is examined, including the National Code, it is clear that there are already detailed and specific standards in place to cover all aspects of the student experience, encompassing:

Marketing Information and Practices; Student Engagement Before Enrolment; Formalisation of Enrolment; Education Agents; Younger Overseas Students; Student Support Services; Transfer Between Registered Providers; Complaints and Appeals; Completion Within Expected Duration; Monitoring Course Progress; Monitoring Attendance; Course Credit; Deferment, Suspension or Cancellation of Study During Enrolment; Staff Capability, Educational Resources and Premises; Changes to Registered Providers' Ownership or Management. (National Code 2007 – Part D: Standards)

In addition to the legislative requirements there is an enormous amount of work done at a sectoral level by associations/peak bodies such as English Australia to provide leadership in raising educational, professional and ethical standards, exemplified by the following sample of EA activities:

- ❖ annual English Australia Conference (now in its 22nd year) where providers show their commitment by coming together annually to share good practice;
- ❖ professional industry journal published twice a year;
- ❖ Best Practice Guides for providers in key areas related to the student experience;
- ❖ state/territory based professional development seminars/workshops.

Australian English language colleges operate within the broader global language travel industry where word of mouth recommendations are the biggest driver of student enrolments. As such, the ELICOS sector has had a clear focus on quality and reputation management over the last 20 years. In 1990 English Australia established an industry standards body (the National ELT Accreditation Scheme) and had established the original Tuition Assurance Scheme (TAS) offering consumer protection for overseas students (on all visas) before the TAS model was introduced by the ESOS legislation (only for student visa holders).

Within its overall strategic goal of providing leadership in raising educational, professional and ethical standards within English Australia member colleges, EA develops Best Practice Guides in order to achieve five main goals:

- a) to ensure that EA member colleges are encouraged to reflect on how they deliver quality programs and service to international students;
- b) to support EA members in the development of their policies, practices and procedures;
- c) to provide a benchmarking tool for member colleges;
- d) to reassure all EA members that they are part of a community of best practice; and
- e) to instill confidence in all stakeholders who have dealings with EA members.

English Australia takes compliance with the National Code 2007 and NEAS accreditation standards as minimum standards. The current guide under development is on the subject of student welfare.

An English Australia Staying Safe brochure was developed last year for states and individual colleges to tailor to their own needs and state branches and colleges have worked closely with local authorities to ensure student receive appropriate safety advice as part of their on-arrival orientation.

Understanding the student experience is critical for the industry and last year English Australia commenced work on a project with the International Graduate Insight Group (an independent benchmarking and consultancy service, delivering comparative insights for the education sector worldwide) to examine the student experience within the ELICOS sector in Australia. This project is currently underway and will deliver clear feedback regarding the student experience and how colleges can focus their resources on areas that will deliver an improved experience for students. This project will also allow Australian English colleges to benchmark their student experience feedback against some key international competitor countries. The fact that 58 ELICOS providers have signed up for this project indicates the strong commitment of the sector to delivering quality outcomes.

The international student body has a diverse profile. 150 nationalities were represented altogether among commencing ELICOS students in 2008, with students undertaking English courses for a range of reasons including further study in Australia, further study in another country, leisure/tourism, career enhancement etc.

The drivers behind some of the current issues are specific to a particular profile of students with particular goals related to achieving permanent residency in Australia and the providers and agents that have developed programs and services specific to this group. English Australia believes that it is timely to review the links between education and migration.

4. Legislation / Regulation

Australia already has a world-leading legislative framework for international education. Rather than needing more or 'stronger' regulation, what is needed is a focus on ensuring that the responsible authorities have the legislative powers, the will to act and the resources that are required to enforce the legislation that already exists.

English Australia calls for the forthcoming ESOS review to focus on enforcement of the existing legislation.

Within the context of the establishment of TEQSA, English Australia believes it is important that the quality assurance framework for each sector be examined separately to ensure that a national focus is taken and standards are ensured.

Getting the balance right between regulation and the flexibility required for an export industry to compete on the international stage is a critical one for Australia at this juncture.

The temptation to regulate 'more' must be tempered by a clear understanding of where the issues lie and what can be achieved realistically in addressing these issues. Making the regulatory hurdles higher will not prevent those who wish to duck under the hurdle from doing so. The hurdle does not need to be higher, just stronger and less susceptible to

breach. The Industry Commission was both accurate at the time and prescient in the overview to its 1991 Report; Exports of Education Services:

“Major problems ... arise because of ongoing change in Australia's education system, where, in some respects, a dynamic market oriented export sector sits uneasily within the existing highly regulated education system.” (page 1)

This situation still pertains. While international education is regulated by Australian Government law in relation to compulsory registration (ESOS Act) and visas and conditions of entry (Immigration Act), the enforcement and accreditation of providers are still subject to State and Territory law. Providers that operate across different jurisdictions face costly duplications of regulatory requirements, whilst those that operate solely in one jurisdiction still face complex compliance requirements regulated by various state and commonwealth departments in relation to their domestic and international responsibilities. Despite this plethora of complex and costly compliance requirements, the accreditation and registration agencies have not done their jobs in the area of enforcement and one of the issues seems to be a lack of coherent national focus.

English Australia recognises that international education is not unique in this respect. The Review of Export Policies and Programs (Mortimer Review), which reported in 2008, devoted a chapter to “Coherence and co-ordination of the national trade and investment effort”. The main point made in this chapter was:

“The interests of Australian businesses seeking to grow internationally are best served by an integrated national approach to trade and investment policies and programs ... better coordination of effort at all levels of government is essential in setting policy priorities and planning, and in the delivery of export and international business services”. (page 140)

As the only international education sector which is totally export-oriented, the English language sector believes it is critical that the regulatory framework for registering and monitoring providers of courses to overseas students should be driven by a nationally consistent approach.

Australia already has a world-leading regulatory framework. The framework is in place and standards are clear. Rather than needing more regulation, what is needed is a focus on ensuring that the responsible authorities have the legislative powers, the will to act and the resources that are required to enforce the legislation that already exists.

The nexus between the primary domestic education regulatory framework and the secondary international education regulatory framework is critical and this is where the problems seem to be primarily located.

In 1990, under the direction of the commonwealth government of the day, English Australia established a national industry accreditation body, the National ELT Accreditation Scheme (NEAS) that established standards specific to this sector of international education (that doesn't deliver to domestic students and therefore had no accountable body within the existing state government regulatory frameworks). The NEAS model has been highly successful in setting standards, conducting regular (annual) audits and maintaining the reputation of the Australian English language sector globally. In the late 1980's many of the problems experienced in international education were identified with “shonky English colleges”. For the last 20 years this has no longer been the case, with Australia leading the world with its national ELT accreditation scheme, offering a degree of quality assurance that

is not matched in any of our competitor countries. This successful regime is in the process of being dismantled by Australian governments, with the responsibility for the ELICOS sector to be assumed by state/territory designated authorities with responsibility for the vocational sector. ELICOS providers are extremely concerned that the national focus and tight controls that have been in place for the ELICOS sector will be dismantled.

The Bradley Review found that the future of Australia's higher education system rests on continuing to ensure its quality and reputation. In responding to the Bradley Review the Australian Government has committed to the creation of the Tertiary Education Quality and Standards Agency (TEQSA), which will oversee the new framework for quality assurance and regulation. It will accredit providers, carry out audits of standards and performance and streamline current regulatory arrangements and provide for national consistency. A national approach to regulation and quality assurance will mean Australia's knowledge and skills needs can be met in a more efficient and transparent way, enabling higher education providers to focus on what they do best – providing quality higher education.

Bradley's focus was on higher education and it is unclear at this stage what role TEQSA will play across other sectors of education, including the English language sector. Within the context of the establishment of TEQSA, English Australia believes it is important that the quality assurance framework for each sector be examined separately to ensure that a national focus is taken and standards are ensured. This should not be restricted to standards but the framework for how industry standards are monitored.

The recent *Annual Review of Regulatory Burdens on Business - Social and Economic Infrastructure Services* draft report, released by the Productivity Commission on 26 June 2009 had some highly relevant comments on the management of risk through regulation.

“A common theme underpinning the regulation of the social and economic infrastructure services sector has been the management of risk through regulation.....

.....It is important to clarify how much regulation is required to manage these risks. It can be easy to place extra regulation on sectors such as social and economic infrastructure services because of the existing relatively heavy burden of regulation. But there is a cumulative cost to pay for this approach and just because there is an already existing heavy regulatory burden does not make every regulation justifiable.

Thus, while it is appropriate to attempt to reduce risks through regulation, it must be recognised that this risk reduction comes with added costs or unintended consequences. It must also be recognised that risk can never be entirely eliminated.

Attempting to eliminate risk is likely to lead to perverse outcomes because it can produce unwarranted expectations by service users and compliance burdens that are so heavy that they impede achievement of the broader policy intent.

Excessive minimisation or avoidance of risk through regulation can lead to overly prescriptive regulations, 'black letter law' interpretation of regulations by regulators and excessive reporting requirements. **Additional regulation can also be seen as a visible and public solution to unfortunate but isolated problems that may arise in the sector. Consequently, that additional regulation is applied sector wide, not just to those isolated cases or non-compliant businesses.....**

..... This approach to risk management can impede innovations in service delivery, increase costs, undermine staff morale and commandeer resources for compliance purposes from the core aspects of service delivery.” (page xxi)

The vast majority of Australian education providers enjoy a deserved reputation for providing high quality education and training, however the actions of a few continue to undermine this reputation.

The quality and integrity of this minority of providers and their courses must be scrutinised. It is commonwealth and state/territory governments that need to answer:

- how did these colleges get registered?
- why are they still operating?

Unless we address the issue of enforcement, the forthcoming ESOS review will be a waste of time and will merely replicate the last review of 2004/2005. An extract from English Australia's submission to the last review is provided below as a clear demonstration of how the current issues have been raised previously (and repeatedly through other forums) and not addressed. Unless governments demonstrate the will to address these issues we will face an identical inquiry in another four years time.

Extract from English Australia submission to the ESOS review October 2004:

“The ESOS Act provides a legislative framework for the international education industry that is intended to both protect Australia's reputation in the international education market and provide consumer protection. When evaluating the effectiveness and efficiency with which the ESOS Act is implemented, English Australia believes it is important to return to the original principles underlying the establishment of the Act.

There are considered to be three areas of ‘risk’ associated with the international education industry – providers, students and agents. It is agreed that it is a small minority of each of these groups that pose this risk. It is essential therefore that any legislation aimed at addressing these areas of risk does so in such a way that the industry as a whole is not penalised for the actions of a few. The ESOS Act needs to represent a balance between ensuring that the majority of bona fide providers are given a legislative framework that will allow them to grow the industry in a sustainable way, without undue costs and levels of bureaucracy, and **ensuring that appropriate mechanisms are in place and resources deployed to tackle the minority of non bona fide providers.**

It is critical that the limited resources available to both commonwealth and state/territory governments be applied in such a way that they address the major issues of compliance and are not frittered away on minor issues.

Although the ESOS Act covers key areas and is generally a comprehensive piece of legislation, EA believes that it could be improved in a number of areas. English Australia has identified the following key issues.

1. Accreditation framework specific to the ELICOS sector
English Australia has concerns regarding the consistent implementation and monitoring of quality standards specific to the ELICOS sector. There are a range of different ‘routes’ for providers to gain accreditation & registration across different state/territory jurisdictions. EA's main aim with regard to quality assurance for the ELICOS sector would be to have a single, national, compulsory scheme which is required for all providers, regardless of ‘sector’, that deliver English language programs.
2. Ability of commonwealth or state/territory governments to close down colleges
From an industry perspective, and without being privy to knowledge regarding compliance action that has historically been taken, there is little evidence to hand that either commonwealth nor state/territory governments have the ability to close down providers that are compromising the integrity of the industry. The lack of transparency in this area causes providers to lack ‘faith’ that the ESOS Act is having an impact on quality assurance for the industry.

3. Lack of focus on major issues

There seems to be a lack of consideration on the part of government of ‘degrees of offence’. Feedback from providers indicates that valuable resources are being expended in addressing minor issues rather than focusing on those areas of primary importance. Providers feel that resources could be targeted more effectively.

4. Lack of ‘visibility’ regarding compliance action

Not only must sanctions be imposed, they must be seen to be imposed. Industry needs to see examples being made of providers ‘doing the wrong thing’.

English Australia welcomes the announcement that the Hon Bruce Baird has been appointed to head up the forthcoming review of the ESOS Act. The conduct of this review at a remove from the Department responsible for implementing the Act will ensure that an appropriate focus is given to assessing the effectiveness of government enforcement of the Act.

5. Investment

The international education industry has only been in existence for two decades and yet in its submission to the House of Representatives Economics Committee *Servicing our Future* inquiry, the Treasury described the industry as “a success story in the Australian economy”. The international education industry has, however, been a victim of its own success. As long as the industry has grown and produced positive outcomes, commonwealth and state/territory governments have been happy to reap the economic rewards without investing in the infrastructure required to ensure a sustainable future for the industry.

English Australia calls for investment by governments in this critical industry to be lifted to a level commensurate with that for other major industries.

The international education industry has seen extraordinary growth, however there has not been concomitant investment in the infrastructure requirements to support this growth.

Significantly larger numbers of both providers and students have required that additional resources be applied to:

- ❖ accreditation/registration monitoring requirements;
- ❖ the development of a professional development framework for the increasing numbers of staff required to work in international education;
- ❖ student services support;
- ❖ accommodation infrastructure;
- ❖ research – understanding the supply-side drivers.

The required level of investment has not been seen.

6. Education Agents

Education agents play an important role in providing advice to students considering study in Australia.

English Australia calls for agents to be viewed as valued partners with a key role to play in advising potential students and for creative approaches to be taken to managing the agent role.

For English language students in particular, the role played by agents is critical as their language skills may be limited and students and their families rely on the education agent as their primary source information.

Over 70% of English language students in Australia are advised by agents, and in recognition of the important role they play, in 2002 English Australia developed a best practice guide for its member colleges on working with agents, recognising that the role that agents play is determined by the specific and varied needs of the students they counsel.

The English language sector has a diverse profile of students eg. a Japanese office lady taking a 4 week English course on a tourist visa; a Swiss university graduate taking a 12 week Cambridge examination preparation course to enhance their employability at home followed by 12 weeks backpacking around Australia; a Saudi scholarship student undertaking 50 weeks of academic English and study skills preparation prior to a postgraduate course; a French student wishing to combine holiday, work and English language study opportunities on a working holiday visa. An agent will have a very different role in terms of the kind of advice required by each of these student “types”. There is value therefore in segmenting agents when considering their roles and how their activities can be managed.

Education agents that operate in Australia and provide advice regarding visas must be registered as migration agents and are subject to the Migration Act. As education advice is generally tied to visa advice it is understood that education agents operating in Australia would all be registered migration agents and therefore operating within a regulatory framework whereby their activities can be monitored and breaches dealt with. It is important also to disentangle education advice from migration advice.

Understanding that the activities of agents based overseas cannot be regulated by Australian legislation, two options have been available to the Australian government. One option has been via government to government communication to encourage governments in key source countries to develop regulatory frameworks of their own to manage education agent activity. This is the case in China for example.

The second option is via the ESOS Act, which already makes providers accountable for the actions of their agents. The issue raised above regarding the lack of enforcement of the ESOS Act is valid also when considering options for ensuring that students receive appropriate advice from agents representing Australian education providers. How has the

ESOS Act been enforced in relation to providers being held accountable for the actions of their agents? One suspects not at all.

Education providers have commercial arrangements with very large numbers of agents (recruiting students in the ELICOS sector from over 150 countries) and manage those relationships within the provisions of the ESOS Act, however they have to rely on a range of sources to get feedback regarding those agents' activities.

Generally, student satisfaction surveys (usually conducted on arrival, halfway through the course and on exit) provide the most valuable feedback to providers on the student's satisfaction with the advice they received from their agent. English Australia has developed a best practice guide on monitoring student satisfaction which assists providers in ensuring they obtain this kind of feedback from students (see *Appendix A*).

DEEWR and DIAC have access to a wide range of information pertaining to agent activities including rates of fraud within visa applications and yet this information is not currently shared with providers. It would be extremely valuable if this information could be shared as it would allow providers to identify agents requiring disciplinary action or termination of their contract.

Australia has again led the world in developing appropriate training programs for education agents and has encouraged agents to take the training as a way of demonstrating their professionalism to potential students and differentiating themselves from untrained agents. This has been a 'carrot' approach rather than a 'stick' approach and relies on agents looking for ways of differentiating their services in what is a highly competitive area.

The Education Agent Training Course (<http://www.pieronline.org/eatc/>) offered by International Education Services in partnership with AEI and DIAC aims to:

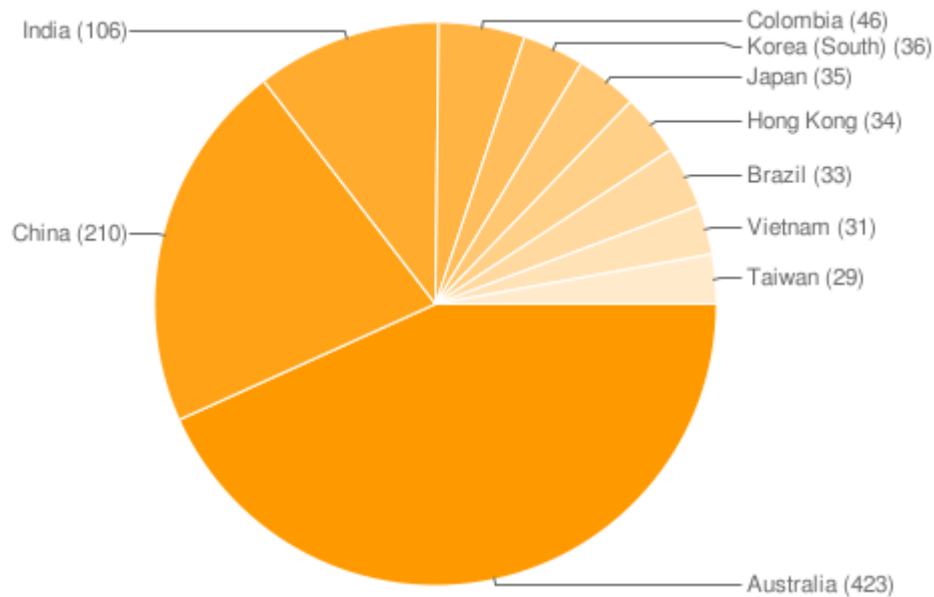
- provide education agents with information about the Australian education system and Australia as a study destination, education quality assurance issues and the Australian visa regulation system;
- keep agents abreast of changes and developments in the international education services; and
- encourage and support excellence in business service delivery, study and career pathways and professional development.

The course covers four areas:

- Australia, the AQF and Career Trends
- Legislation and Regulations
- Working Effectively in International Education
- Professional Standards and Ethics

It has worked well, with over 1,000 agents trained to date. English Australia provides a link to the trained agent list on its website as a way of promoting trained agents to potential students.

Fig 3. Top 10 Countries by Qualified Agent Number



There are considered to be three areas of ‘risk’ associated with the international education industry – providers, students and agents. It is also generally agreed that it is a small minority of each of these groups that pose this risk.

English Australia believes that the existing ESOS framework provides the tools for holding providers accountable for the activities of their agents in a way that is appropriate to their institution. Obviously the requirements for counselling a student planning to undertake a three year degree program would be different to those for counselling a student considering an English college for a 4 week communication skills course.

Critical elements to ensure that the ESOS framework is effective include:

- a focus in enforcement activity on provider management of their agents (against criteria appropriate to the institution);
- communication from DIAC and DEEWR regarding agent activities that cause concern.

An ESOS Amendment Bill is currently proposed for introduction in the 2009 spring sittings which will:

“require education providers to publish a list of education agents they work with to help to reinforce providers’ accountabilities under the National Code of the Education Services for Overseas Students Act 2000 and act as a disincentive to the use of disreputable education agents by providers.”

English Australia believes that this is an unrealistic proposal that will not contribute to addressing the issues of current concern and may very well have implications in relation to trade practices and commercial confidentiality. Both governments and industry need to look beyond regulation for effective strategies that have the appropriate balance of rigour and flexibility to manage education agent activities.

Conclusion

English Australia appreciates the opportunity to make this submission to the Senate Committee. We would also welcome the opportunity to appear before the Committee at a public hearing if required, and would be pleased to arrange a site visit to a member college.

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**Guide to
Best Practice in
Monitoring Student Satisfaction**

GUIDE TO BEST PRACTICE IN MONITORING STUDENT SATISFACTION



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GUIDE TO BEST PRACTICE IN MONITORING STUDENT SATISFACTION



Introduction

Background

English Australia regularly prepares **Guides to Best Practice in ELICOS** (Best Practice Guides), collating information provided by member institutions, who represent the full spectrum of provider types, purposes and locations in Australia, and incorporating current TESOL research.

Within its overall strategic plan of providing leadership in raising educational, professional and ethical standards within English Australia member colleges, EA provides Best Practice Guides in order to achieve five main goals:

- a) To ensure that EA member colleges are encouraged to reflect on how they deliver quality programs and service to international students;
- b) To support EA members in the development of their policies, practices and procedures;
- c) To provide a benchmarking tool for member colleges;
- d) To reassure all EA members that they are part of a community of best practice; and
- e) To instill confidence in all stakeholders who have dealings with EA members.

English Australia takes compliance with the National Code 2007 and NEAS accreditation standards as minimum standards.

There is no requirement for monitoring student satisfaction with services offered as part of ELICOS programs under the National Code or the ESOS legislation. The first element of each of the three Australian Quality Training Framework (AQTF 2007) standards for registered training organisations (RTOs) is for continuous improvement, gaining feedback from a range of stakeholders including students (DEST 2006).

For ELICOS students, the Australian experience encompasses a broad span of activity starting with how they access information about and book their course, continues through their arrival in Australia and orientation to their chosen institution, incorporates accommodation and social activities and of course includes curriculum (syllabus, assessment and teaching) and pastoral care and support while they are studying.

English Australia invited all members to participate in a survey in order to pool the expertise of a wide range of providers. This paper is a summary of the findings of this survey, based on input from 20 ELICOS institutions around Australia.

Why monitor student satisfaction?

Finding out what our students think about our programs and services is essential to ensure we are continuing to meet student needs. If our students are not happy with our ELICOS provision we want to find out why so that we can a) remedy the situation; or b) inform students of the reasons why we cannot or prepare future students for a situation we can predict they may not be happy with. Unhappy students

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are bad for business: local, national and international studies have shown that recommendation and 'word of mouth marketing' are significant factors in a student's choice of provider.

Knowledge of levels of student satisfaction can enable an organisation to use its resources more effectively. The knowledge can be used to inform decisions as to setting up student services; programming; staffing levels and skills; purchase of furniture and educational materials; as well as curriculum and resource development for educational delivery. An organisation can be sure it has the most effective agents and pre-registration processes.

A key outcome of monitoring student satisfaction is effective targeting of professional development. Knowledge of levels of student satisfaction can help organisations plan their professional development programs for staff, targeting quality of support services, quality of the learning experience and quality of teaching¹. Quality professional development, targeted at areas of need identified by students, managers and the staff members themselves can lead to increased student satisfaction thus more student enrolments.

Students report high levels of satisfaction with an institution that is obviously interested in their views and takes these views seriously. There can also be a washback effect of monitoring student satisfaction if personnel involved in the provision of programs and services that are surveyed are aware of the monitoring and strive to get positive feedback.

Whereas student services staff, teachers, management and agents can make broad statements based on anecdotal information the only effective way to find out students' response to specific programs and services is to ask them directly. Because students are not a homogenous group and student profiles are constantly changing it is important to get feedback on a regular basis. This information can then be fed back to appropriate people to ensure that operations are running as effectively as possible.

¹ Merrifield, G. (2006) *Research into Good Practice in Institutional Professional Development in International Education: Australia, England, Canada and the USA*. Wellington: Education New Zealand

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Key Features of Best Practice

A number of key features of best practice in monitoring student satisfaction were evident within the member institutions.

1. There is a 'culture of continuous improvement' within the institution where it is evident that the students' views are valued and acted upon and where monitoring student satisfaction is viewed as a process rather than event.
2. The institution uses a variety of ways – formal and informal, spoken and written – to find out how the students' experiences are being received and acts on issues and problems as soon as they arise, where practicable.
3. The process is transparent. Staff and students at the institution and other service providers such as agents and homestay providers are aware of the aims and outcomes of any student satisfaction process: there are no 'hidden agendas'.
4. The monitoring methods and tools are appropriate to the aims of the activity and the students involved ie survey tools are culturally appropriate and the language used easily understood by the students.
5. Monitoring processes are evaluated and reviewed on a regular basis to ensure monitoring is appropriate and relevant to the current student body.

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Survey Purposes

Best practice indicates survey methods are closely linked to the reason for the monitoring. The following are the main reasons identified in this project:

Why	Find out students' views on aspects of student experience	Find out how students are settling into new environment	Find out students' views on aspects of curriculum
Outcome	Inform review of agents & recruitment information; professional development planning; institutional policies and procedures; resource allocation	Deal with problems promptly	Inform review of curriculum, programming, professional development planning, performance review, resource allocation
Focus	<ul style="list-style-type: none"> Recruitment processes Student services Facilities, resources etc Staff having contact with students Curriculum 	<ul style="list-style-type: none"> Student services (accommodation, airport pickup etc) Course (appropriate level, type etc) 	Curriculum ie programming, course content, methodology, assessment & teaching, resources
Who	<ul style="list-style-type: none"> All students OR Sample group (demographic or class) 	All students	<ul style="list-style-type: none"> All students OR Sample group (demographic or class)
When	<ul style="list-style-type: none"> At any time during the course On exit from the institution 	During first week of student's course	<ul style="list-style-type: none"> Midway through course AND/OR End of course
How	<ul style="list-style-type: none"> PA, Marketing, DoS 2 – 4 pages Paper-based, online survey Formal 1-1 interview Group discussion 	<ul style="list-style-type: none"> DoS Brief (1/2 page) Paper-based survey Interview 	<ul style="list-style-type: none"> DoS 2 – 4 pages Paper-based, online survey Group or individual interview/discussion

Some institutions also survey students' response to a potential new course or service, a kind of market research to evaluate possible satisfaction levels. Focus groups are most useful for this type of activity, which can be carried out at any time.

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Examples of best practice

College A, a medium sized private institution, carries out a substantial orientation survey process. Students undertake group orientation and induction that includes a placement interview with a senior teacher. Every student is then introduced to the Student Services Officer, who conducts a 5 – 10 minute interview designed to find out if the student is looking for work, if they are happy with their accommodation and if they have any other concerns. The SSO then introduces each student to each of the marketing officers at the institution. A week later the SSO conducts a follow up interview to make sure any issues have been addressed.

The SSO at College A is a trained ESOL teacher and is employed for four days a week. College A reports that because of the personal introduction and attention given during the first week, students feel comfortable approaching the SSO with problems and, if necessary, a marketing officer who may speak their language.

College D has developed three versions of its written survey so that students with different levels of English and in different courses can participate in the activity. The survey starts with an opportunity for students to reflect on their learning in different skill areas before gauging opinion on different student services.

Survey Methods

How can I monitor levels of student satisfaction?

Following are the most popular approaches to monitoring student satisfaction. Details of these approaches are outlined in later sections of this paper.

In any kind of **written survey** eg paper-based or online questionnaires, best practice indicates there is a combination of quantitative responses (tick a box, circle the appropriate response) that provide information in the form of 'hard data' about the students' experiences, and qualitative responses (room for students to write comments) where institutions can find out more about what students think about their experiences. Qualitative responses are always more challenging to interpret because of the variation in information given by students. Written surveys can capture information from a large number of respondents and can be used when anonymous responses are required. On-line surveys are easier to collate and interpret than paper surveys and may be more attractive to Gen Y students who use computer technology on a daily basis.

Students report a high level of satisfaction with any method that enables them to have face-to-face contact with college staff and to discuss their views. **Formal interviews** between staff (counsellors, teachers, senior teachers etc) and individual students provide opportunities for the interviewer to 'drill down' to find more about why students hold the views they express. They can be carried out in conjunction with written surveys. Disadvantages of this survey type is that interviews can be time consuming and staff implementing them need to be trained in listening to student responses effectively.

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Increasingly, **group interviews or discussions** are being used by member colleges. With this method, students are more likely to be able to see an immediate response to their issues: with written surveys many students leave the college before their issues are addressed. Students can also see if their concern is widespread, or if they or the group they represent are the only one holding a particular viewpoint. A good moderator or facilitator is key to the success of a group activity (see below). **Focus groups** can be explorative and diagnostic ie used to 'test the waters' for a new course or service.

On the whole, **suggestions boxes** are not considered to be effective despite college staff making efforts to advertise the opportunity and 'dress up' the boxes to make them attractive.

Student counsellors are often a valuable source of information about student satisfaction levels as they listen to individual student problems and issues. These can then be addressed directly with the student concerned.

Examples of Best Practice

☞ College J, a large, metropolitan institution dealing with pathway students, reports the use of student diaries as very effective. Students are encouraged to write their experiences and reflections on a regular basis in an exercise book provided by the college. The diary is then read by the teacher and corrected/ responded to as appropriate. This has three main purposes: to provide an opportunity for the students to practice their writing skills; to enable the teacher to monitor satisfaction levels with the program and address salient issues; and to enable the teacher to identify and help deal with any personal issues that could be affecting the student's stay. Students disclose more as they get to know the teacher and the college. The nature of the activity means that because students are not anonymous, teachers are able to refer them to appropriate support as necessary. This practice has been taking place for a number of years and is viewed as very positive by both teachers and students.

☞ College M, a large private institution, holds an informal weekly morning tea for all staff and students. The Director reports that students often take that opportunity to approach staff with problems.

☞ Many colleges, large and small, implement formal interviews between teachers and students in their class every four to five weeks. Students complete a meaningful task in class while teachers take students out of class one by one to go through a range of prepared questions focussing on curriculum and other issues.

Who is monitored?

Generally, institutions survey most, if not all, students. This is very resource-intensive in the cost of printing and time required for analysis of paper based surveys and there is no guarantee that all students will be completely candid about their views. There can also be a danger of 'survey fatigue' if students are asked to undertake surveys too often, especially if outcomes are not evident, and that students become careless about completing the surveys, thus rendering the activity pointless.

Some colleges use sample groups, nominating a demographic or class group or proficiency level. One college reported that there was little difference between responses from different demographic groups: differences were far more likely to arise because of the student's personality than because they belonged to a particular cultural group.

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Respondents suggest that carrying out a written survey in class time gets a better coverage of students, if maximum participation is a goal. Students who are given a choice whether to participate generally choose not to. Material incentives such as vouchers, movie passes etc may help boost participation.

Unless numbers and percentages are required by management in order to inform decision-making in response to survey outcomes, the only reason a college would need all students to participate would be if they want all students to feel as though they are getting a voice. In that case there may be more efficient and effective ways of doing this, such as the use of groups. It may be effective to invite students to volunteer to give feedback if they want to, but no college that was involved in this survey reported these approaches.

Examples of Best Practice

☞ The Director at College M, a large, university institution, noticed that students were ‘surveyed out’ after completing evaluations at the end of every course. Now all students take part a brief orientation interview and College M implements a 2-page written survey of students representing the biggest nationality groups on set dates twice a year. Other groups, such as all students at a particular level, are targeted at random from time to time in order to find out their specific issues of concern.

☞ If students at College J want to move to a higher level course, they are required to complete a “Level Up” survey in conjunction with a proficiency test. This two-page paper-based survey, focusing on the student’s perceived language development and also covering aspects of student services, is then used as the basis for discussion with the student as to their readiness to move.

Using the student’s first language

It is widely recognised that students can be much more forthcoming when they are able to use their first language to express their views. Although most colleges do not provide their written surveys in students’ first languages, citing cost as the reason they don’t do this, many would like to and those who do report successful outcomes.

Example of Best Practice

☞ At College J higher level students or bilingual staff members are used to interpret for lower level students, students going through an emergency or experiencing a high level of stress: this is done only for non-sensitive issues and no one has reported dissatisfaction with this arrangement at any level.

Internal or external?

Outsourced monitoring can be expensive but may be more valid if it is designed, administered and interpreted by trained professionals.

Example of Best Practice

☞ College B, a medium sized university provider, took part in an externally designed and implemented written survey as part of the university’s approach to monitoring student satisfaction. The college staff had input to the survey and the draft survey was trialled before being administered to all students. The DoS was gratified to find that the outcomes of the externally-administered survey were similar to those

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of past surveys administered by the college although the students provided more comments to the former survey.

Written Surveys

Principles

Whether the survey is administered online or on paper, certain principles apply.

- ❖ Involving staff in the development of a survey instrument will encourage a feeling of engagement with the process.
- ❖ Always keep in mind the goal of the survey. One approach is to make a list of what you want to know then design a question for each one: this ensures all questions are relevant.
- ❖ Keep it simple! Use plain, clear English and avoid long complex sentences. Students at lower levels may not have learnt how to read the language and layout of formatted texts 'form English' yet so you may need to write complete sentences rather than the usual truncated phrases of this type of text. Remember to make the instructions, as well as the survey questions themselves, clear and use examples where appropriate.
- ❖ Written surveys can be an opportunity to teach students how to understand 'form English'.
- ❖ To maintain a user's attention, a survey should take no longer than 15 – 20 minutes to complete.
- ❖ Make sure the layout is clear with lots of white space around the writing, and a font that is easy to read (no less than 11 points). Avoid the 'fun' fonts – stick to Arial or Times New Roman for best results. If you want students to write a response, make sure there is enough space. Use formatting such as numbering, bold and heading size to clearly indicate different sections of a survey.
- ❖ Think about how the question will be answered. If you're going to give a choice of answers, can you cover all possibilities or is it better to allow space for an open-ended response?
- ❖ Consider a brief introduction to the survey outlining the purpose of the survey and how the outcomes will be used.
- ❖ Check the spelling and grammar of the questionnaire.
- ❖ Thank the student for doing the survey.
- ❖ It is crucial to trial a draft survey before you implement it. Get different staff members to try the survey to iron out any bugs. Staff from non-English speaking backgrounds may be useful to try the survey to make sure they understand it.

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Online survey tools

Using programs such as www.surveymethods.com and www.surveymonkey.com it is easy to create secure surveys (using the same principles of survey design as outlined above) and set them up for students to complete anonymously. It is even easier to collate the information: the program does it for you in a number of different ways and the information can be imported to Excel. To quote one manager: "It takes the pain out of collating results and leaves time and energy to follow up on student feedback." Both programs are subscription services that can be accessed through the website.

There are some cheaper or even free programs available, however ease of access and use are often compromised so 'buyer beware'!

If you choose to use an online survey make sure it is easy to create and edit the survey and that you can filter the responses to get information you need. Make sure you're signing up for a program that is appropriate for the number of users you think will be involved and the number of surveys you plan to implement.

Anonymous or not?

Conventional wisdom has it that students are more likely to express themselves if their responses to written surveys are anonymous. However many colleges report no difference between outcomes of anonymous and identified responses and if a student has given their name, they can be approached to receive response to their particular problem. If there is a strong culture of continuous improvement and students are confident they will not be punished for responding honestly, they will be more willing to identify themselves in a survey.

Examples of Best Practice

☞ College G uses a merge function to print the students' names on their paper-based surveys. The students have reported they like this personalised touch and are happy to be identified on their responses.

☞ At College H, students do not have to identify themselves but are advised that doing so may help them resolve an issue. On completion of their survey the students file their papers in an envelope, which is taken by one of the students to the Director of Studies.

Spoken Surveys

Principles

Spoken surveys can be formal and informal discussions that occur between individual students and college staff as well as discussions carried out with groups of students and a facilitator or moderator.

There are some overarching principles that apply whatever the mode of interaction.

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- ❖ An effective interviewer or facilitator needs some kind of training in interacting with students so that they do not influence outcomes of the interaction or insert bias. It is important that the staff member listens to the student(s), takes notes and responds in a considered manner that is not defensive or aggressive.
- ❖ It is useful to have a list of questions to ask students in a formal interview/discussion situation, yet be flexible enough to pick up on points students make and 'drill down' a little further.
- ❖ An information situation where the power distance between the facilitator and the students has been successful in many cases. Providing refreshments can help students feel relaxed.
- ❖ Interviewers will get more from students if they ask open-ended questions that require more than a yes/no response.
- ❖ For validity of outcomes it is important the interviewer/facilitator avoids asking 'leading' questions where it's clear to the student what the expected response is.
- ❖ Pauses are a valuable part of this type of interaction. They give the student time to think about how they're going to say and what they want to express.
- ❖ Facilitators of group discussions need to manage the meeting to achieve outcomes, encouraging all to participate and not allowing one student to dominate discussion.
- ❖ Records of all discussion are required and interviewers/facilitators need to make notes of important points and any decisions that were made.

Using groups

Groups can be a very effective way of finding out how students feel about aspects of their ELICOS experience. Participants can be selected/invited at random or for a particular characteristic eg level, course, pathway or class; age, gender or nationality/language group. It may be necessary to appoint representatives as requests for volunteers often go unfilled, although the appointees need to be willing participants. Around 12 participants appear to be ideal for this type of activity. The facilitator may have specific items for students to discuss, eg a range of questions about different aspects of the program or services, or students can bring issues put forward and discussed in a class/group meeting. Participants can have opportunities to express their own individual views or they can be representatives of other groups, providing an opportunity for students lacking confidence or a high level of English to have their views expressed anonymously through a third party. Students seem to give the most favourable responses in a timeframe of 45 – 60 minutes.

Note: the expression 'focus group' is often used when people really mean a group interview or discussion. Strictly speaking a focus group is a carefully selected group of people who meet to give their opinions on a particular issue or item. A focus group isn't a group interview where everyone is expected to participate but an exchange of opinions and views that can be explored. The focus of this type of activity is on what happens during discussion and should be led by someone trained in qualitative research methods. There is a very useful article on group discussion in *EA Journal* Vol 20 No 1 entitled 'Focus Groups and ELICOS Evaluation' by Margaret Zeegers.

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Example of Best Practice

🌀 The Director of College W, a large university centre, was concerned that surveys were not a real reflection of student experiences. She implemented a system whereby two representatives of each class meet with other representatives and the facilitator (usually the DoS but always someone who does not teach) and a 'secretary' to present their opinions. In this way students are able to express possibly negative views by being able to say "Someone in my class believes that...". Because the facilitator holds a position of responsibility they are able to respond to student concerns instantly. These meetings take place in the penultimate week of every course. The Director found that the quality of feedback increased markedly and she has continued this system for several years.

Responding to Survey Outcomes

Once information has been received from monitoring activities the next part of the process is to interpret and respond to that information. Best practice indicates that information is handled and interpreted by people who are able to do so sensitively and with understanding of a larger context eg marketing staff do not use negative responses as a criticism of teachers. Things are not always what they seem, especially as regards teaching and learning: for example students who have learnt largely de-contextualised written English may have an issue with classroom activities that involve communicating with other students. They may lack understanding of what is necessary for them to make progress with their spoken English and may require individual counselling with the teacher or Director of Studies to help them accept this different approach.

Record aspects of student feedback, including information from a range of sources, for monitoring over a period of time. Summaries of levels of student satisfaction with all aspects of the student experience can be regularly sent to those involved in program and service delivery, including external contractors such as agents and accommodation specialists, as well as to the financial and curriculum decision-makers within an institution. This provides opportunities for praise and recognition as well as for focus on improvement.

As part of a transparent approach to the process, outcomes of surveys to find out how services are viewed can be published so that students can see how others have responded (and can see that perhaps not everyone shares their view!). This is easier for written surveys, especially those conducted on line as they have built-in data collection facilities. It is not appropriate to publish outcomes that contain criticism of identifiable people.

Examples of Best Practice

🌀 College K, a medium sized private metropolitan organisation, carries out curriculum monitoring as the students leave the college. The DoS or a senior teacher interviews each student and among the questions they are asked to comment on and grade the teachers they had during their study. This information is used to provide feedback to the teachers, and may be the basis of continued employment at the college. The teachers are all aware of this and rather than see it as a negative point, they are motivated to do their best. The staff is very stable and team-focused.

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☞ At College B the Director of Studies frequently visits classrooms as requested by teacher to address any issues of concern that are common to most students.

☞ The Director of College J, a large university centre, makes note in a spreadsheet of all major areas of concern expressed in survey and 'signs them off' as they are addressed. That way she is building up a snapshot of how concerns change over time.

Points to Consider

1. Regardless of the approach you take to monitoring student satisfaction, make sure there are clear procedures and training for staff who are going to be involved. These can be part of staff induction processes and included in the Staff Handbook as a permanent reference.
2. Provide professional development in areas such as listening and responding to students. Make sure staff dealing with student problems have clear guidelines as to what they can and cannot do in different situations. Again this can be covered during staff induction and included in the Staff Handbook.
3. Include names and location of people who can help eg DoS, student counsellor, homestay coordinator in the Student Handbook and introduce these key people to students during orientation.
4. Display grievance procedures clearly in classrooms.
5. Your student body, services and programs are bound to change from time to time. Evaluate your surveys regularly to make sure they are relevant and useful.

Example of Best Practice

☞ College J had a problem with students approaching marketing staff who spoke the same language: the marketing staff would then approach teaching staff about the problem on behalf of the student. This caused resentment on both sides. Following implementation of clear procedures (students complete a form and marketing staff may help students complete the form but may not intervene otherwise) the issue has now stopped.

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Acknowledgements

There proves to be a wide range of good practice implemented by EA member colleges. Around 25% of all member colleges in 2007 responded to the survey (see below) and we thank them for being willing to share their successful processes and practices. EA would like to particularly thank the colleges marked with a * who offered their time and expertise in discussion with the Project Officer.

*Ability Education

ACL Sydney

*Australian Pacific College

*Billy Blue

Chisholm Institute

Deakin University English Language Centre

GEOS QCE Brisbane

*PIBT International English Centre

*Meridian International School - Sydney

*Milton College

Phoenix Academy

*RMIT English Worldwide

Step One College

*Swinburne University English Language Centre

University of New England English Language Centre

*University of Tasmania English Language Centre