

## Public consultation online

Consultation on English Language Teaching (ELT) Council Regulation

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Feedback from : Alan Marsh

### OPINION

Regarding the proposed legislation:

1 It is quite possible that the Council will not have a representative who represents TEFL teachers

As the draft regulations stand, it is quite possible that a Council could exist in which no member has any direct experience of teaching English as a Foreign Language.

- Regulations 5 (b) and (e) specify that the member appointed by the Minister and by the Rector respectively should have competence in teaching English. This could easily be a member who may have competence in teaching English at University, Sixth Form, Secondary or Primary level, none of which reflects the syllabus content, methodologies an learner needs normally experienced in private language schools.

Regulation (g) allows for the possibility that non-academic members be elected by the licenced schools.

2 Irrespective of argument 1, there is no member who has direct classroom contact with the experiences and challenges faced by EFL teachers, who constitute the great majority of working people in this sector. They also have direct, daily classroom contact with the needs, both regular and fluctuating, of the end user of the product: the EFL learner.

3 The Council as proposed consists of members from academia, the tourism sector, EFL language school owners and their representatives or their employees (including Directors of Studies, who as part of school management and answerable to their employers, cannot validly represent teachers' voices independently)). There is no voice to speak independently in defence of the interests of language school teachers, whether they be contractually employed or operate on a freelance basis, of whom the latter comprise a considerable percentage and possibly the majority of language school teachers.

So why not propose that a teacher be elected from amongst all those who possess a valid EFL teaching permit?

FELTOM representatives could be reduced to 1 member to accommodate this measure. Alternatively, one member could be added to the Council.

4 The general tone of the document seems to be rather punitive. For example, there is no provision for support for schools and other teaching institutions to upgrade themselves. Many would appreciate assistance in, for example:

- a) improving their management systems
- b) improving their marketing systems
- c) improving their internal communication procedures
- d) improving their pastoral care of clients

Surely the Council should be offering such assistance?

On the same note, surely support should be offered in helping schools to fulfil and maintain licence conditions, rather than merely threatening withdrawal of the licence if conditions are not fulfilled and maintained.

5 Indeed, a general area of weakness in the industry is the management side. In the draft proposal, no management qualifications or experience are stipulated for a school director for example, (as they are for academic positions). Surely this is an area that needs addressing in order to professionalise the sector?

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