

## Public consultation online

Consultation on English Language Teaching (ELT) Council Regulation

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Feedback from : Director of Studies

### OPINION

Will a qualified teacher who does not complete any teaching hours in 4 years but who completes the required CPD hours be able to renew her permit?

Please find below my feedback/concerns on the above proposal. I am sorry that these are being sent in so late but I have only just been made aware of the possible changes.

Page 5. Point 3 - If any vacancy in the board occurs for any cause, the Minister shall, as soon as practicable, appoint a person to fill the vacancy.

In the case of an elected member position becoming vacant the Minister should not be allowed to appoint someone to fill the vacancy a re-election should take place or the person with the next number of votes be offered the position

Page 5. Point 4 - It is unclear if each school has one vote in total or a vote for each of the two positions.

Page 7 Point 6 (1) (i) - there should be some details that allow for the provision of an ombudsman in the case of a disagreement in the applying of fines or penalties.

Page 7 Point 6 (2) - 'power to enter'. This section should be clearer on when entry can be made and in what circumstances

Page 11 Point 10. The holder of an ESP permit will not be permitted to act as an English Language Teacher other than for the specific purposes applied for.

Many qualified existing EFL teachers also currently teach ESP courses and have either the qualifications or management experience you require for an ESP licence. These teachers should therefore be able to teach both ESP and other English classes.

Will there be a specific list of ESP subjects? For example I have worked in banking for 18 years with a considerable number of years spent in managing and running my own branches. Therefore I should be able to teach ESP banking but also the other ESP areas that come under banking e.g. ESP Sales and marketing, ESP Management etc.

I disagree with the requirements you have stipulated to obtain an ESP licence. To teach ESP effectively I believe that you need to be experienced within the specific industry so that you know how to use the relevant expression and vocabulary within the correct context and can converse at a variety of levels with people from that industry. This can be done by someone who has worked within the industry in a

variety of positions. They may not have held a management position or studied to a degree level but simply have worked their way up in a company and simply not wanted to be a manager. The EFL standard permit would still apply.

Some teachers will need to be issued with more than one ESP permit due to the nature of their business background before they became an EFL teacher.

Are you planning to include General Business English within ESP and if so what specific requirement will you require for the permit or will it remain as a standard subject?

Part B - Non Academic Services.

Page 21. Point 1.1 The Head of School is to appoint a person with overall responsibility of the non-academic services. If eligible in accordance with the criteria and requirements of these regulations, a person who is HoS or DoS can also be appointed non-academic service manager.

I will soon be starting work in a brand new EFL school as DoS. The school is small. My experience of running a bank branch in the UK which incorporated all aspects of both the premises, business etc more than qualifies me to have overall responsibility of non-academic services. However, I am unable to do this as I do not meet your requirements.

On a similar basis someone who has successfully run a number of EFL schools, over many years, would be prevented from being responsible for non-academic services as they do not meet your requirements. Again they would be able to perform this role much more effectively than many others.

I think that the person's background and experience should be taken into account when these positions are filled. This will help ensure that it is the 'best person for the job' who is employed.

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