

## Public consultation online

Consultation on English Language Teaching (ELT) Council Regulation

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Feedback from: Francis Stivala – HOS NSTS

### OPINION

The draft is an improvement on the current subsidiary legislation and is to explicitly include quality assurance within its regulatory framework and emphasise the formal ELT process in the definition of "School", however permitting non-formal and informal learning as processes for transmission of non-academic services.

The spread of experiences from the sector is critical to the efficient functioning of the ELT Council. Restrictive measures are to give way for democratic representation that encourages an equivalent balance.

The Council is to be empowered to establish, maintain and enforce Council rules.

Appropriately qualified persons are to address the text to regulations 16 and 17.

Part A of the Schedule must provide for a qualified deputy to share the duty with the DoS to "be present at all times" as this tends towards a physical impossibility with Schools moving towards "triple banking".

A School may be a Distance Learning Provider and the same exclusive DoS may serve both entities equivalently within this same one legal personality.

The School Academic Manager is to be explicitly addressed.

An ELT Permit already includes an oral test and a distinct third test is totally unwarranted. If at all the existing oral test is revised, becoming obligatory on all including those who are exempt from the proficiency written test.

CPD hours should have an absolute lower threshold of say 8 hours as the present proportional proposal is unwieldy to apply and control. The Council must operate effectively

A saving clause is needed for 1.4 Part B.

In Part D a Domain Name Services registration with the Council is a must to identify a recognised Distance Learning Provider.

Fees for Home Tuition Providers are disproportionate.

In addition to the foregoing proposed amendments of substance I submit a full text which incorporates additional amendments as well as adjustments and corrections to the submitted draft received on 27 January 2015.