

Public consultation online

Consultation on English Language Teaching (ELT) Council Regulation

Feedback from : MATEFL

OPINION

Display name:

MATEFL has considered the Council Regulations that are being proposed by the EFL Monitoring Board and would like further clarification on certain points and also has recommendations of its own, all of which are listed below. In response to the call for open dialogue, MATEFL puts forward the following questions and recommendations to the Board for their due consideration.

Regulation 5 (1)

MATEFL proposes that one of the members on the Council should be a practising teacher. The main arguments for this proposal are the following:

1 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 (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 and learner needs normally experienced in private language schools.

- Regulation (g) allows for the possibility that non-academic members be elected by the licensed 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. A Council member that is a practising teacher would be able to offer fresh perspectives from the point of view of practitioners of the teaching profession and of the end-user of the EFL product.

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). 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.

If it is imperative that the number of members on the Council do not exceed 9, then MATEFL suggests that FELTOM be given one seat and the other seat be given to a practising teacher.

Distance Learning and Home Tuition Providers

Distance Learning and Home Tuition Providers have been put in the same classification as Category A schools in terms of a licence fee; yet, where a Category A school is classified as having a maximum of 2,400 student weeks in a year, a Home Tuition Provider is being restricted by the same regulations to

a maximum of 104 student weeks a year. Similarly, a teacher providing Distance Learning that works independently from a school will fall far short of 2,400 student weeks in a year.

1. MATEFL feels that the licence fee for Distance Learning teachers and Home Tuition teachers working independently of schools is excessive and should be considerably reduced.
2. MATEFL would like more clarification regarding whether Home Tuition Providers will also have to continue paying the Host Family Licence, if they will also be paying a Home Tuition Provider licence.
3. Home Tuition Providers are being restricted to teaching no more than 2 students at any one go. Surely this should depend on the size of the room for tuition as it does for schools. If the Home Tuition Provider is also accommodating students at the same premises and legislation restricts them to a maximum of 4 students, it follows that this should similarly apply to the maximum number of students they can teach at the same premises (4) at any one go, depending on the size of the room they use for lessons.

CPD

The proposed recommendations will require teachers teaching full-time on an annual basis to cover a minimum of 13 hours CPD annually (based on 52 weeks). MATEFL deems this is a lot of CPD in one year for ELT organisations and schools to provide. MATEFL recommends that a clause is added to the existing wording stating that the minimum number of CPD hours for teachers working 32 weeks and over is capped at 8 hours.

MATEFL would like the parameters of CPD to be better defined and poses the following questions which need further clarification:

1. If a DOS or a teacher who is not a teacher trainer gives a training session and produces a certificate to that effect, would the participants of that session be considered as having had CPD?
2. If teachers attend webinars (online training sessions) and produce certificates of attendance, does that constitute towards CPD? If it doesn't, would the Board consider a ratio which would constitute as part of the total CPD?
3. How does a DOS accumulate CPD hours in order to qualify for the ELT permit as required by the document as DOSs do not necessarily teach at all? What is the CPD minimum requirement for DOSs?
4. Do CPD sessions that teacher trainers deliver count towards the teacher trainer's own CPD? Do teacher training courses such as TELT, TEFL Cert, CELTA, DELTA, CertTESOL, and DipTESOL that teacher trainers deliver constitute as part of their own CPD? Does research time towards training sessions contribute towards a trainer's CPD?
5. Does research in an ELT field, such as Action Research, contribute towards a teacher's CPD?

Schedule 2(d) SEPTT

The proposed SEPTT examination is unclear. It has not been described, its purposes not defined and its band descriptors are unknown. In addition, MATEFL does not see why the present system of teacher certification (a TEFL Cert. methodology course and the well-established TELT examination, part of which already consists of a Speaking Examination) needs to be replaced. MATEFL strongly recommends that more information is given to all stakeholders on SEPTT before it is made a requirement.

Lack of supportive measures

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, for example, assistance in improving their:

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

MATEFL expects that the Council would offer 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. MATEFL asks for a redress and appeals system to be put into place to offer schools and Home Tuition and Distance Learning Providers if they are found to have fallen short of the requirements.

Regulation 10 (2)

'An ELT Permit or ELT Permit for Distance Learning may be issued to any person who, on application and in the opinion of the Council, has the required skills according to these regulations to teach the English language to students who are speakers of other languages'

MATEFL asks that the phrase 'and in the opinion of the Council' should be removed. If teachers fulfil the requirements according to the regulations then the opinion of the Council should not feature.

Schedule Academic Staff Regulation 5 (c)

The requirement for Distance Learning practitioners to have a certificate in 'a training programme in the use of computer technology demonstrating knowledge in the workings of the system approved by the Council' is deemed unnecessary in this world of digital natives. It may have been necessary 10 years ago but not nowadays. The proposed document is legislation and will stand for tens of years. This regulation is already antiquated for those who practice Distance Learning now let alone in 10 years' time. MATEFL asks for this regulation to be removed.

ESP Permit

MATEFL understands that the introduction of an ESP permit allows schools to employ individuals who have come from a specialised area and not from a teaching background. The document does not, however, state that practising teachers with an ELT permit who have been teaching ESP can continue to do so. As the proposed document stands, it may be interpreted that only ESP Permit holders can teach ESP. MATEFL recommends that wording is included in the regulations that specifies that teachers with an ELT Permit are not excluded from teaching ESP.

MATEFL looks forward to seeing the proposed regulations revised with consideration given to the questions and recommendations that it has brought to the attention of the EFL Monitoring Board as presented above.