



## LANGUAGES OTHER THAN ENGLISH POLICY

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Student Lifecycle Stage/s	Admission, Teaching & Learning and Student Support

### 1. PURPOSE

To ensure compliance with the *Higher Education Standards Framework (Threshold Standards) 2021* for courses delivered in a language other than English. This policy outlines how students who study an **ACT course** in a language other than English are appropriately supported, and outlines the approval and quality assurance processes for delivery and assessment of courses undertaken in a language other than English.

### 2. DEFINITIONS

**ACT** is the *Australian College of Theology Limited*.

**ACT award** is a qualification conferred by the **ACT** which is certified by a **testamur**.

**ACT Office** is the office of the *Australian College of Theology Limited*.

**ACT Registrar** is the officer of the **ACT** who manages academic administration and performance assessment.

**Affiliated College** is an institution approved to offer an accredited higher education award of the **ACT**.

**Approved Countries** is the list of countries appearing on the current list of English Language Proficiency requirements of the Australian Universities Admissions Centre. See Appendix 1 at the end of the *English Language Proficiency Policy* for an accessible list.

**Assessable qualification** is a qualification which has been successfully completed in English, including completion of senior secondary studies comparable with the NSW



HSC; successful completion of at least one full year of Australian or comparable tertiary studies, successful completion of an AQF diploma or advanced diploma, successful completion of Australian or comparable non-award post-secondary level studies or tertiary preparation courses with full-time equivalence of one year.

**Award** see **ACT award**

**Course** see **Course of Study**

**Course of Study** is a course of **units** that lead to an **award** given by the **ACT**.

**Coursework** is work done by a student within a **unit** of study to a set curriculum and assessment schedule.

**Director of Research** is the officer of the **ACT** who manages all research and research training through the **Graduate School of Research**.

**English Language Proficiency** is the ability to use the English language to make and communicate meaning in spoken and written contexts.

**Graduate School of Research (GSR)** is the division of **ACT** which oversees research and research training, managed by the **Director of Research** and overseen by the **Research Committee**.

**HDR** stands for Higher Degree by Research.

**HDR candidate** see **Higher Degree by Research candidate**.

**Higher Degree by Research candidate** is a **candidate** enrolled in the **MTh, DMin, ThD** and **PhD** degrees. Also known as an **HDR candidate**.

**HESF (2021)** is the Higher Education Standards Framework (Threshold Standards) 2021.

**Higher Education Provider (HEP)** is an institution such as a university or other tertiary college providing tertiary level or higher education. In Australia they are regulated by **TEQSA**.

**HSK Test** (Hanyu shuiping kaoshi) is an international standardised exam that tests and rates Chinese language proficiency. It assesses non-native Chinese speakers' abilities in using the Chinese language in their daily, academic and professional lives. The HSK consists of a writing test and a speaking test (HSKK), which are independent of each other.

**IELTS** stands for *International English Language Testing System* – Academic version only

**Language** means the language of instruction for a **unit**, unless otherwise indicated, noting that some units involve study in an "original language" (i.e. Greek, Hebrew).



LOTE stands for Languages other than English.

### 3. SCOPE

This policy applies to **ACT** at an institutional level in relation to all policies and procedures relating to the delivery of **ACT courses** in **languages** other than English, including both **Coursework** and **HDR courses** although separate approaches are taken for these. The policy also applies to the **affiliated colleges** that have received approval to deliver any specific **ACT courses** in a language other than English.

### 4. POLICY STATEMENT

**ACT** recognises the multicultural context of Australia today and need for quality higher education in religious studies. As a specialist **higher education provider** in this area, **ACT** is committed to offering a range of its **courses** in **languages** other than English. This allows greater access to courses and deeper engagement with the subject material when studied in the student's primary language.

The **ACT** is committed to meeting its obligations under **HESF (2021)** for courses delivered in a language other than English. These standards require **higher education providers** to ensure that "admitted students have the academic preparation and proficiency in English needed to participate in their intended study" (Standard 1.1.1, which in this context is any English proficiency required for study conducted in a language other than English. Students also need proficiency in the relevant language other than English for study.

Within **Coursework awards**, proficiency in English is not required for the completion of studies where the course is delivered in a language other than English. Requiring a demonstration of English language proficiency for **LOTE** students could limit access to courses and place a burden on prospective students. In order to ensure that all prospective and current students have access to appropriate information and processes relating to their course, **ACT** will ensure that appropriate material is provided for students in their language of instruction. This policy outlines these resources and the availability of services to students studying in a language other than English.

For **HDR candidates**, given the specialised support services and the comparatively lower number of candidates likely to seek to undertake a course in a language other than English without a relatively competent level of English language proficiency, a different approach is appropriate for **HDR** degrees.

**ACT's** understanding of the principle of HESF 1.1.1 is that not only do admitted students have proficiency specifically in English needed to participate in their intended study, but that they have proficiency in the language of their course instruction needed to participate in their intended study. For that reason, applicants to a course in a Language Other than English are required to demonstrate proficiency in that language.



The only approved language other than English for ACT courses is Chinese. Courses approved for delivery in Chinese include all Coursework Awards of the ACT, and the Master of Theology (Research).

## 5. PRINCIPLES

### STUDENT REQUIREMENTS

#### **Student requirement: proficiency in a language other than English**

- 5.1 Applicants to a course in a Language Other than English are required to demonstrate proficiency in that language. Applicants to a course to be delivered or assessed in Chinese must satisfactorily demonstrate of Chinese language proficiency, to the satisfaction of the Academic Dean of the relevant Affiliated College. Chinese language proficiency may be demonstrated from one of the following:
- 5.1.1 The applicant holds a formal qualification completed in Chinese, issued by a provider of education registered with the relevant authority, completed within the last ten (10) years; or
  - 5.1.2 The applicant, for ten (10) or more years, has used Chinese as the language primarily spoken both at home and work; or
  - 5.1.3 The applicant provides proof of Chinese Language Proficiency. Normal proof of Chinese Language Proficiency is the outcomes of a **HSK Test**, or a test administered by an Affiliated College which has been approved by ACT as one which will enable students to demonstrate proficiency in Chinese needed to participate in their intended study.
  - 5.1.4 The **ACT Registrar**, on the written request of an **affiliated college**, has the right to waive or vary the requirement for proof of Chinese Language Proficiency as part of the admission process. On such occasions the **Registrar** will advise the relevant college in writing and record the action on the relevant student's record.

#### **Student requirement: English Proficiency – Higher Degrees by Research**

- 5.2 The *English Language Proficiency Policy* applies to applicants to a higher degree by research within Australian College of Theology in English. Where applicants wish to complete their research degree in a language other than English, demonstration of English language proficiency is required from one of the following:
- 5.2.1 The applicant holds an **Assessable Qualification** completed in one of the Approved Countries, completed within the last ten (10) years; or



- 5.2.2 The applicant has been resident in Australia for ten (10) or more years, with English being the language primarily spoken both at home and work; or
- 5.2.3 The applicant provides proof of **English Language Proficiency**. Normal proof of **English Language Proficiency** is an IELTS Test – Academic Version, with the IELTS requirement being an overall score of at least 6.0, with both Reading and Writing each being at least 6.0.
- 5.3 The **ACT Registrar**, on the written request of an **affiliated college**, has the right to waive or vary the requirement for proof of **English Language Proficiency** as part of the admission process, with consultation with the **Director of Research**. On such occasions the **Registrar** will advise the relevant college in writing and record the action on the relevant student's record.

#### Student requirement: Flexibility in the use of English – Coursework Awards

- 5.4 The standard delivery structure of units in a language other than English is that all learning activities (such as all classwork, lectures, tutorials, readings and completion of assessments) is undertaken in the language other than English. As such, proficiency in English is not required for the completion of studies where the course and all units are delivered and undertaken wholly in a language other than English.
- 5.5 Students undertaking ACT units and courses in a language other than English may wish to undertake some learning activities of a unit in English. For example, a student may wish to enrol in a unit in Chinese language, undertake the class in Chinese, complete readings in Chinese, but wish to submit one or more written assessments for the unit in English. In such cases:
- 5.5.1 Affiliated colleges are authorised to permit individual students, on written request, to complete specified learning activities in English within a student's coursework unit enrolled in a language other than English. The Affiliated College is to have a designated staff member responsible for the assessment of such requests, and in considering a student's request, the college staff member is required to ensure that the student has the *proficiency in English needed to participate in their intended study* (HESF 1.1.1). In order to undertake a review of a student's English language proficiency, an Affiliated College may implement a relevant testing mechanism.
- 5.6 Students who are enrolled in a course in a language other than English may wish to submit a unit enrolment application for a unit (or units) in English. Such students should refer to the *Unit Enrolment and Results Policy* and the *English Language Proficiency Policy* as the standard admission requirements for units undertaken in English language apply.



## QUALITY MANAGEMENT OF COURSES IN A LANGUAGE OTHER THAN ENGLISH

### *Translation of Key Policies and other published material*

5.7 ACT is to provide and maintain published translations of key policies and published material into Chinese. This includes the following:

5.7.1 Information about courses

5.7.2 Admission policies and fee information

5.7.3 Orientation materials

### *College approvals and quality assurance processes*

5.8 Processes for approval of delivery of a course in a language other than English are outlined in the *Affiliated College Changes Policy*.

5.9 The quality of the delivery and assessment of courses delivered in a language other than English is ensured through the processes outlined in the *Affiliation Agreement*, *Higher Education Standards Management Policy*, and *Quality Management Policy*.

### *Provision of a bilingual contact person in each affiliate college offering LOTE*

5.10 In order to ensure that **LOTE** students fully understand and can access all **ACT** policies as well as interact with ACT as needed, each affiliated college offering courses in LOTE will provide a bilingual contact person to provide interpretation to, and on behalf of, LOTE students. They will support LOTE students in applying the translated policies. This will ensure that students are adequately informed prior to admission and supported throughout their studies.

### *Policy assistance to be provided on request*

5.11 A list of policies which relate to students but have not been translated into **LOTE** is outlined at Appendix B. This list, and a brief summary of the policy purpose is to be provided to students in LOTE. Students will also be informed of the availability of the bilingual student support officer at their campus to interpret the English policy for them, at no cost to themselves. This will ensure that students are adequately informed prior to admission, and supported throughout their studies.

### *Student Grievances and Complaints*

5.12 The *Grievance Resolution Policy – Students* outlines that students have the right to lodge a formal grievance either in English or in the language of



delivery of their course.

- 5.12.1 In the case of a student lodging a formal grievance in Chinese to the Affiliated College or to the ACT, the Affiliated College and the ACT Office undertake to provide necessary interpretation and translation support required in order to address the specific concerns of the formal grievance.

#### *Student interaction with ACT office*

- 5.13 Students need to be able to communicate freely with ACT about any aspect of their course. In order to facilitate this, the student's primary sponsoring **affiliated college** undertakes to translate and interpret on behalf of the student to the **ACT office** for any written or verbal communication that the student wishes to undertake with ACT staff.

#### *ACT office interaction with student*

- 5.14 **ACT Office** needs to be able to communicate freely with the student about any aspect of their course. In order to facilitate this, the student's primary sponsoring **affiliated college** undertakes to translate and interpret on behalf of the **ACT Office** to the student for any written or verbal communication that the ACT Office wishes to undertake with student.

#### *ACT-delivered content or programs*

- 5.15 All programs and initiatives of **ACT** to be presented to students need consideration on how the objectives are achieved by students enrolled in courses in languages other than English. Examples of this include Academic Integrity modules, safe environments training, or any other institution-wide programs that ACT students are to undertake.

#### *Affiliated college student support services in LOTE*

- 5.16 Affiliated colleges that provide courses both in English and in LOTE need to also provide relevant student support services in LOTE (e.g., library materials, student advice services, etc).

#### *Affiliated college material*

- 5.17 Affiliated colleges will provide all relevant affiliated college material, including but not limited to college policies, websites, admission processes, course content, advertising, etc.

#### *Demonstration of compliance with the HESF standards*

- 5.18 ACT has analysed the **HESF (2021)** standards to determine which standards



require students to be able to either have sufficient proficiency in English or **LOTE** translation available for them. The following standards have been identified and necessary actions determined as follows for courses studied in Chinese language.

<b>HE Standard</b>	<b>Action to achieve and demonstrate compliance</b>
1.1.1	Admission policies, requirements and procedures are provided in LOTE; Minimum LOTE proficiency expectations to be established
1.1.2	All fees and policies relating to changes, withdrawals, credit for prior learning, tuition protection and refunds are provided in LOTE
1.1.3	Admission requirements, contractual arrangements and enrolment forms are provided in writing in LOTE
1.4.1	Learning outcomes for each course of study in LOTE are published
2.4.3	Provision for LOTE students to lodge a formal grievance in LOTE, and associated provisions from ACT and the Affiliated Colleges to support a student throughout the management of the student's grievance.
2.4.4	Decisions about formal complaints and appeals are recorded and the student is informed in writing in the appropriate LOTE and English, along with further avenues of appeal where they exist and the student could benefit.
5.2.1 5.2.3	Admission procedures and policies and orientation provided in LOTE will promote and uphold the academic and research integrity of courses and units and study.
5.3.5	Students will be given opportunity to provide feedback on their study via feedback mechanisms provided in LOTE.
7.2.1	Course information and admissions policies are made available in LOTE and a designated bilingual contact person provided to assist students
7.2.2	All the information normally provided in plain English for students, will be provided in LOTE
7.2.3	Policies relating to students holding or applying for an Australian student visa will be provided in LOTE
7.2.4	Any changes impacting LOTE students will be provided in LOTE





## 6. RELATED DOCUMENTS AND LEGISLATION

*English Language Proficiency Policy*

Higher Education Standards Framework (Threshold Standards) 2021

## 7. REFERENCES

During development of the now superseded *Admissions Policy – English Language Proficiency*, the University of Queensland “English Language Proficiency Admission Requirements for University Programs” stated several times that residence in Australia for a ten-year period was sufficient evidence of English language proficiency. This was initially considered, however there were concerns amongst ACT stakeholders that residence alone does not guarantee competence in English, and that an applicant ought to use English as the primary language both at home and at work. This increased measure was inserted into the draft policy before approval. Recent benchmarking at the time of approval of this document shows that UQ continues to allow students without assessable qualifications in English or formal English language testing to be admitted to courses, now stating a requirement for “acceptable evidence of sufficient English language skills developed through paid and/or voluntary work experience in a primarily English-speaking professional environment for at least 3 years immediately before the start of your UQ studies”.  
<https://future-students.uq.edu.au/apply/english-language-proficiency-requirements>

## 8. VERSION HISTORY

Version	Approved by	Approval Date	Effective Date	Changes made
1.0	Board of Directors	9 November 2020	1 Jan 2021	New policy
2	Board of Directors	3 June 2024	3 June 2024	Policy review, minor revisions
3	Academic Board	2 August 2024	2 August 2024	Embedding flexibility for undertaking some tasks in English and associated language proficiency requirements

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## APPENDIX A

### *List of policies and key material required to be translated into languages other than English:*

#### Policies

- Academic integrity policy for coursework awards
- Course Progress Policy
- Coursework course enrolment policy
- Credit Transfer Rules
- Grievance resolution policy – students
- Overseas students release and transfer policy
- Overseas Student Extension, Deferment, Suspension and Cancellation Policy
- Prior Learning Policy
- Unit enrolments and results policy
- Sexual assault and sexual harassment policy
- Sexual assault and sexual harassment procedure
- Tuition fee refund policy
- Whistleblower policy

#### Other

- Webpage information for each course to be delivered in a language other than English, including course structure, rationale, admission requirements, duration, course learning outcomes.
- Tuition fee information
- Overseas students letter of offer and written agreement
- Course information and course learning outcomes
- Coursework Course and Unit Application and Enrolment Forms are to be established by relevant Affiliated Colleges using the ACT template, and confirmed by ACT for use.
- Information on student support published on ACT website for students, with specific references to the additional supports for students studying in a language other than English.



## APPENDIX B

*List of policies and other material which may concern students but are not translated into languages other than English, to be summarised and made accessible to students:*

- Academic Governance Policy
- Assessment guidelines
- Assessment Policy
- Codes of conduct policy
- Committees of the Academic Board Policy
- Community engagement policy
- Conferral Policy
- Courses policy
- Critical incident policy
- Exam computer use rules
- Field education policy
- Moderation Policy
- Orientation Program rules
- Quality management policy
- Student records management policy
- Unit categories policy
- Unit delivery rules