Response to the Department of Education Services and Training:

Discussion Paper - Foundation Program Standards: positioning for quality, success, and competitiveness

We welcome the opportunity to contribute to the consultation process for the recreation of the *National Standards for Foundation Programs* (the Standards). The intention of this paper is to provide perspectives and insights from ███████████████████████████████ ████, including possible challenges, to inform the department's updates in the recreation of the Standards with a view to enhance quality.

The responses follow the sequencing of the discussion paper and highlight items that are supported or not supported and include suggestions or commentary in relation to these positions.

Student Preparedness:

Ensuring appropriate English language requirements:

Ensuring assessment outcomes for the academic English
There needs to be a minimum threshold for students whose second language is essential. English is not the only indicator of success for future learning. Students who complete the Foundation program and achieve the required GPA, based on tracking data, are able to study successfully at tertiary level. For the college's pathways, courses with IELTS entry higher than 6.5 do not have articulation for Foundation students for example nursing which requires IELTS 7. This approach ensures students are not entering such courses with language capabilities / competence that is not sufficient to meet the academic demands of the course.

Supported
Increase of IELTS for extended programs
The proposed increase of the IELTS entry requirement from 5.0 to 5.5 for extended programs is supported.

It is worth noting that the ████████ entry requirement for extended is currently EILTS 5.5 with a minimum of 5 in writing. There is quite a significant difference between a 5.0 and 5.5 because student competence across the 4 macro skills, reading, writing, speaking and listening, is significantly different between these two IELTS levels. Therefore 5.5 better prepares students for working in an English language learning context across academic subjects. In addition to learning general academic English language and terminology students are also required to develop a range of disciplinary specific language in context which requires more nuanced and more sophisticated language capabilities. We would strongly recommend that 5.5 be adopted as the minimum EILTs entry requirement for extended programs.

Supported
Minimum EILTs score for the standard program is appropriate
The current EILTS entry requirement for standard programs of 5.5 is appropriate however, in order for students to improve their language capabilities to be adequately prepared for tertiary study sufficient face-to-face time needs to be embedded into the curriculum. Ensuring sufficient language support services are available to students including independent language learning resources, extra curricula workshops, online training modules including academic integrity and library research and referencing, formative feedback systems, helps to set students up for success in their current and future studies.

If the entry requirement remains at 5.5 students must have access to 200 hours of face-to-face (or equivalent) language learning as research supports that this is required to go up 0.5 of a band score to reach IELTS 6 for university entry.

We would argue that 100 formal contact hours for students entering with IELTS 5.5 does not provide sufficient language acquisition to adequately prepare students for university level studies.

Academic Preparedness:

Supported
Written agreement with 'receiving universities'

Suggested
Written agreements between a provider and the university include assurance that the offered curriculum adequately prepares the student for higher education programs. The Standards establish and state an agreed set of measures or aims that underpin this assurance to provide a definition or scope of what constitutes 'adequately prepares the student for higher education.'

Whilst Foundation Programs are non-award and therefore not assigned an AQF level, some reference could be drawn from AQF Senior Secondary in terms of preparation, for AQF 5 -Diploma and AQF 7- Bachelor Degree. Establishing academic performance objectives and requirement would assist in ensuring consistency and provide a meaningful framework for collaboration and benchmarking across the sector.

In addition to academic preparation, students and in particular international students require preparation for university culture and the culture of a new country.

Tracking and monitoring Foundation students in their university studies across a range of indicators relating to student preparedness and performance would provide valuable insights however, it should also be recognised that student performance at university is a product of many factors including the university curriculum, its delivery and both academic subject specific support and extra curricula support provided to students at the university.

Supported
'Overall results': providers must assess overall university readiness
This suggestion is linked to the written agreement between providers and receiving universities. To assure the receiving university that students are 'adequately prepared' the curriculum, including assessment, must assess overall university readiness. This is in essence the purpose of Foundation courses and their curriculum. Curriculum design, assessments and assessment criteria should prepare, assess, and indicate overall university readiness. In addition, Grade Point Average or equivalent entry thresholds should be in place, and appropriately set, to further assure student preparedness for different fields of university study.

Suggested
Whilst the intent is supported, the location for the suggested change does not relate to the 'Overall Results' section of the Standards, the subject of which is administrative. This amendment relates to Standard 1 *The program must be based on a curriculum which prepares students for further study in higher education programs.*

Formal Learning methods: explicit attention and focus on, critical thinking, academic rigour and academic integrity

Not Supported
Critical thinking:

The Standards currently do not identify, nor do they prioritise, particular forms of thinking. To focus attention on a particular type of thinking or way of thinking, has the potential to devalue other ways which are equally important.

Suggested

In addressing student learning the focus should be on productive, purposeful and intentional thinking that supports learning across knowledge domains, an array of skills (including thinking skills) and their application.

The Australian Curriculum identifies Creative and Critical thinking as key to learning that prepares students to respond to 21st Century complexity, challenges and contexts. In defining these capabilities, a broad array of skills, including cognitive skills, behaviours and dispositions are encompassed.

A broader and more inclusive approach to knowledge, skills and their application would better serve the Standards in describing adequate preparation for tertiary studies. Consideration of aligning these to AQF Senior Secondary and Australian Curriculum would be welcomed.

Supported
Academic rigour: explicit attention and focus on

Academic rigour at the appropriate level is essential to ensure adequate preparation for tertiary education.

Suggested

Inclusion of explicit attention and focus on academic rigour is tied to the need for the Standards to articulate more definitive requirements of what constitutes 'adequately prepared' for higher education programs. This relates to curriculum design including assessment design and assessment criteria and the intended levels of academic performance. Closer alignment and or inclusion in the TEQSA AQF would be beneficial in creating greater consistency across the sector.

Supported
Academic Integrity: explicit attention and focus on

Suggested

In line with the National Standards, it would be appropriate to include the requirement that providers have policies and procedures that promote and uphold academic integrity, and processes to address and record alleged dishonesty / academic misconduct. In addition to this, that providers have systems in place to report on instances and have governance processes in place to monitor and improve student awareness and preparedness regarding academic integrity.

Supported
Regulation of courses under 26 weeks

That pathway courses under 26 weeks that include academic coursework be regulated under the Standards in order to be registered in CRICOS.

The inclusion of pathway courses for internationals students that are under 26 weeks in the Standards provides a regulatory vehicle for quality assurance and monitoring of these courses beyond CRICOS registration requirements. Further, inclusion of this category of course recognises the diverse range of academic preparedness and language proficiency amongst the international student cohort seeking pathways to university studies. Appropriate admission requirements to such courses would of course be critical.

Modern delivery methods:

Supported
Ensure *student* access to digital and physical resources and support services

Suggested
A more definitive account of digital resources and support services would provide clarity for providers. For example: academic and language subject resources, software, online self-guided modules, academic learning support, study success guides and or modules, access to supplementary services and or materials and or study success workshops.

Supported
Need for the Extended Program
Students enter the Extended Program of Foundation for myriad reasons including language proficiency and academic performance, however, students also choose this pathway to gain confidence, allow time for acculturation.

Supported
Should 'Online Learning' be part of Foundation Programs
The inclusion of 'online' as a mode of delivery for Foundation Programs is supported, however, the definition of "online" needs to be clearly outlined. From the college's experience of face-to-face teaching via a hybrid 'live' online model, students generally perform at the same level as face-to-face with pass rates and satisfaction rates being comparable. Some students thrive in the online environment whilst others find it challenging particularly in relation to social interaction and the development of relationships with their peers.

The definition of 'Online' for Foundation Programs would need to incorporate face-to-face learning experiences and engagement that are equivalent or similar experiences to those of students face-to-face on campus. The students learning in Foundation Programs need the opportunity to apply and test their learning in social contexts (Halliday) with their peers. This is particularly critical for language acquisition and acculturation. In addition, providers may benefit from guidance for online offerings including recommendations relating to the combination or proportion of asynchronous and synchronous hours intended for "online" verses hybrid / blended or fully face-to-face.

What is the expectation in terms of content and support to be provided to students 'online' and outside of the F2F contact hours – how is this scaffolded in a way that supports language acquisition / macro skills development, pragmatics, negotiation, practise and the socially situated nature of language acquisition. Where face-to-face hours drop additional measures are needed to provide students with sufficient, regular, and targeted feedback on their progression, additional scaffolding and additional opportunities for check ins, to practice and engage in formative assessments to build resilience and students' capacity as independent learners.

Consideration of younger cohorts can be captured by the inclusion of a new standard to address younger cohorts including consideration of dispositions and cultural norms. This new standard would benefit from inclusion of awareness and support for negotiating the online environment. Minimisation of bullying, harassment, inclusion of codes of conduct, supervision, welfare support, and learning support are all integral to supporting all students regardless of mode. The inclusion of specific measures to support students in online learning environments, learning environments mediated by the technology, would provide further support and protection of younger cohorts.

Distinction between streamlined and general

It is important to maintain a distinction between streamlined and general Foundation Programs for a number of reasons.

General programs are important pathways for students to progress academically and linguistically whilst considering their options for future studies. A generalist course should offer an adequate cross section of subjects across the broad fields of study typically offered at university level and specifically the university that the Foundation Program is a pathway to. General programs enable students to experience a broader range of study, and with the inclusion of some electivity allows students to refine, redirect their pathway. To this end key learning areas including English language should be broad enough and provide sufficient choice and flexibility to enable students to develop a clearer idea of the field of study they wish to pursue at university.

Quality assurance

Access to Reports: Students should have access to progress reports in an online format to assist them in monitoring their own progress and have assurance of the accuracy of the records.

Exams: The current coverage of coursework and exams in Standard 6 would benefit from a much broader review and discussion regarding the nature of assessment, (assessment for learning of learning and as learning) particularly in relation to authentic assessment and the inclusion of both formative and summative assessments. Exams are one form of summative assessment and like all assessment they should reflect course expectations, learning outcomes, and undergo appropriate assessment design, benchmarking and moderation.

The standards should actively encourage continuous assessment and feedback with assessment being a vehicle for determining student progress and performance and an opportunity for providing feedback and promoting learning for students.

In addition, the inclusion of measures relating to universal design for learning and academic integrity would be of benefit in this standard.

The requirement that exams should not form more than 40% of the overall assessment weighting is supported. One assessment task should not determine whether a student passes or fails a unit. The suggestion here would be to consider extending this maximum weighting to all forms of assessment to provide students adequate opportunity to learn through their assessment and respond to feedback during the course of each unit / subject. The providers policies and procedures regarding assessment design should stipulate this and address any circumstances where it may be appropriate to exceed this percentage; for example, when an assessment item forms part of a series or groups assessment that is worth more than 40% of the unit grade.

Consistency with ESOS legislative framework:

Supported
Create a new standard addressing the care and protection of under 18s

Suggested

This standard should reference Commonwealth and state legislation, and draw from the National Code of Practice, Standard 5, and ELICOS Standard P2 so there is consistency across the legislation. The minimum age requirement of 17 years of age is appropriate particularly with the addition of a Standard relating to care and protection. In terms of maturity, cultural awareness and academic preparedness students entering Foundations programs vary significantly and age is not the determinant although it can be a factor. This is not unique to international students or Foundation Programs.

With appropriate standards in place, including monitoring of student welfare, hosting agreements, guardian and living arrangements, pastoral care and learning support, younger students succeed and excel in Foundation Programs and can be adequately prepared for tertiary studies. This includes adapting to new culture, social norms and navigating social media and social pressures.

Suggested
Foundation Programs must be a minimum of 20 hours tuition per week
Specifically, this amendment is calling for a minimum of 20 contact hours per week
The intention to align with ELICOS Standards wherever possible and appropriate is supported. The Standards currently are not prescriptive in relation to the number of face-to-face hours, rather they stipulate a minimum of 20 contact hours per week. The ELICOS Standards, Standard P1.1 calls for a minimum of 20 hours face-to-face scheduled course contact per week. Clarity around the exact meaning of minimum of 20 hours tuition per week is required.

In clarifying what constitutes the minimum of 20 hours consideration should be given to developing language proficiency as this is a key objective of Foundation Programs.

Language proficiency is an essential requirement for international student success and the requirement for a minimum of 200 hours (not 100 hours) minimum of formal English language learning is recommended. Given that language development is a socially mediated process and requires time and full-immersion in language, including language use in familiar and unfamiliar contextual it is important to acknowledge the language learning that occurs in the academic subjects the students are studying. To provide students the best opportunity for language acquisition and proficiency, face-to-face hours for both English language and academic subjects needs to be considered. Such consideration is needed to establish the minimum face-to-face contact hours required to strike a balance between post entry language learning and academic studies.

Supported
Annual program of teacher professional development including teaching students from non-English speaking backgrounds.
The professional development of teachers teaching in Foundation Programs is essential for maintaining the quality and currency of these programs. The inclusion of recommendations or minimum requirements for professional development of teaching staff would assist providers to ensure staff participate in professional development programs and activities. The inclusion professional development for teaching students from English as second language or dialect background would be welcomed as part of the required professional development.

Consideration of the nature and extent of professional development needs to consider the variation of employment models and the impact training standards may have on individual organisational capacity and resources across the sector. Other considerations would be to encourage the establishment of special interest groups and communities of practice. An active body that supported Foundation Programs and professional development would also be welcomed.