

# English Australia submission

## National Standards for Foundation Programs



**Sent to:** DESE via online submission

**Submission via:** <https://www.dese.gov.au/consultation-foundation-program-standards-now-open>

### About English Australia

**English Australia** is the national peak body and professional association for the **English Language Intensive Courses for Overseas Students (ELICOS)** sector of international education. We represent over 110 member colleges throughout Australia. These colleges provide quality English language programs to students and professionals from around the world. All most all Foundation Program providers are English Australia members.

### Response to the Consultation

English Australia welcomes the opportunity to comment on the Department of Education, Skills and Employment's (DESE) discussion paper, created as part of its review of the National Standards for Foundation Programs.

English Australia actively encouraged the opportunity for members to submit their own responses directly to DESE and consulted extensively with member colleges who provide Foundation programs.

#### **1. What are your overall comments on the paper, including the possible amendments?**

The discussion paper provides valuable insights into the considerations that DESE is making as part of its review of the National Standards for Foundation Programs. However, the paper somewhat misrepresents Foundation Programs by focusing overly on the English language teaching component of these Programs. Equally important are the academic skills and subject specific units that make up the bulk of a Foundation Program and which are hardly referenced in the discussion paper. This omission provides a limited framework for considering potential amendments to the Standards.

The consultation paper fails to appropriately recognise the value of Foundation Programs as successful pathways into higher education. The referencing to unsubstantiated media claims on the robustness of these programs offers little value and should be excluded.

English Australia would welcome the public release of research and data from the Department of Education, Skills and Employment that provides evidence of the levels of academic performance, attrition/ retention of international students that have undertaken Foundation Programs compared to other cohorts. Consensus across English Australia members is that international students who have undertaken Foundation Programs gain the English proficiency and pre-requisite academic knowledge and skills that lead to higher levels of academic success.

**2. Is the minimum age requirement of 17 years of age to commence a Foundation Program, or 16 years of age with prior approval by TEQSA, appropriate?**

English Australia believes that the current minimum age requirement of 17 years of age to commence a Foundation Program is appropriate. English Australia strongly opposes any increase to the minimum age, particularly given the university higher education sector does not require students to be over 18.

Australia's strong legislative frameworks ensure sufficient protections for young persons with which Foundation providers must comply. The ESOS National Code requires providers to have policies and processes in place for enrolling and supporting younger students. Providers must also apply to TEQSA for an exemption to enrol students under the age of 17 in Foundation Programs.

Consideration might be given to providing more guidance on the approval processes in place for enrolling students who are 16 years of age. However, this may be in the remit of the Regulator, TEQSA, rather than the Department.

**3. Is there a need for 'extended' Foundation Programs?**

English Australia strongly supports the need for 'extended' Foundation Programs and their inclusion within the Standards. Extended programs are a vital course for supporting students who do not meet the academic and/or English requirements for 'standard' Foundation Programs.

The consultation paper misrepresents the upskilling of English only as opposed to the academic skills development in extended programs. Students typically enter extended Foundation Programs with gaps in key prerequisite academic skills and the required acquisition of assumed knowledge, such as chemistry or design, as they may not have completed these subjects in their high school studies.

Under the current Standards, the programs themselves cannot offer English only studies, meaning there is little merit in comparing 'extended' Foundation Programs to packaging an ELICOS and a Standard Foundation Program. Equally, there is little merit in re-testing students' English language proficiency after an 'extended' Foundation program as this is not the core focus of the program and there are rigorous testing processes in place within the program itself. Foundation Programs providers have been highly regulated over the past 10 years without any report of adverse regulatory findings to necessitate any change in current practices.

English Australia notes there has been no evidence to demonstrate that the English proficiency of students that have completed Foundation Programs (standard or extended) is not appropriate to support academic success.

English Australia strongly opposes changing the minimum entry setting of IELTS 5.0 to IELTS 5.5 for extended Foundation Programs. The longer program and the minimum English class contact hours that are included in the existing Standards ensure that students receive the appropriate amount of support. References to IELTS scores should be expanded to 'IELTS or equivalent', as there are other standard benchmarks commonly used to measure English language proficiency.

**i. If so, how should the Standards apply to them?**

English Australia believes that the Standards should be identical irrespective of whether referring to 'extended' or 'standard' Foundation programs. Extended programs should be explicitly included in the Standards in parallel with standard programs. Further, extended programs should only be offered by providers who offer a standard program.

English Australia also strongly supports the continuation of the publication of the Explanatory Guide that accompanies the Standards. The Explanatory Guide offers critical detail that might otherwise be missed when only referring to the Standards.

**4. Should the Foundation Program Standards also regulate courses under 26 weeks?**

English Australia does not support the inclusion of short courses under 26 weeks within the Foundation Program Standards, however, we note it is important to recognise the value of these courses. These short courses allow providers to match student academic and language proficiency levels to a proportionate study level. These courses are ideal for students who may marginally fall below the level of pre-requisite knowledge and/or assumed knowledge of the higher education course requirements.

There may be an opportunity for an alternative course name, other than Foundation Programs, to be developed for these types of courses which reflects the nature of the course but is distinguished from the standard or extended Foundation Programs.

Our view is that these short courses should only be offered by self-accrediting higher education institutions to ensure that unscrupulous providers do not register shorter 'Foundation Programs' for commercial advantage. This will ensure that these courses are regulated under the ESOS Act and National Code as well as the institution's own quality assurance practices regarding the admission of students according to Higher Education Standards Framework (Threshold Standards) 2021 principles.

**ii. If not, should providers be able to register these courses on CRICOS as 'non-award'?**

Any new non-award course which seeks to act as an academic pathway to Higher Education for international students should be required to be at least 26 weeks in length to fall under the definition of Foundation Programs and the related Standards.

**5. Should online learning be a part of Foundation Programs?**

Online learning has become an increasingly important aspect of a positive student experience and it is a natural evolution for Foundation providers to adapt their curricula and course delivery. Foundation providers are not isolated in this shift with their university partners also expanding their online learning space to enhance the student experience. Expanded online delivery to achieve better student outcomes naturally necessitates changes in governance and this should be recognised in the Standards.

**i. If so, how should this be specified?**

The current definition of Online learning in the National Code of Practice for Providers of Education and Training to Overseas Students 2018, does not reflect new delivery modes via digital platforms where ‘asynchronous’, ‘live-streamed synchronous’ and ‘blended’, among others are aspects of online learning whose definition will impact the delivery of Foundation programs, requiring an update to the definition.

The current definition under Modes of delivery in Standard 8 notes:

“Online learning is study where the teacher and overseas student primarily communicate through digital media, technology-based tools and IT networks and does not require the overseas student to attend scheduled classes or maintain contact hours. For the purposes of the ESOS framework, online learning does not include the provision of online lectures, tuition or other resources that supplement scheduled classes or contact hours.

Clarity is also needed around existing terms like ‘face-to-face’ and what this constitutes exactly. This is particularly important for attendance monitoring when asynchronous online learning is included and for aligning attendance requirements with visa requirements.

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**ii. What limits should be in place (such as course percentage or hours per week)?**

English Australia believes the limit should be within the allowable level prescribed in Standard 8 of the National Code whereby (8.19), ‘A registered provider must not deliver more than one-third of the units (or equivalent) of a higher education or VET course by online or distance learning to an overseas student’.

Limits are required with the provision that the different types of online learning are clearly defined. The online learning component of a course should be informed by the skills required to engage with online learning strategies of the ‘receiving university’.

A provider should have the ability to demonstrate to the regulator the use of online delivery as part of the scheduled course contact hours and reflect their obligations to adequately monitor attendance and course progress, particularly for younger students.

**iii. How would consideration be given to the younger cohorts in Foundation Programs?**

English Australia believes that the same provisions that are currently stipulated in the ELICOS Standards would be appropriate for younger cohorts in Foundation Programs.

We recommend that face-to-face (on-campus) class contact options be available each week to younger learners for no less than two-thirds of the scheduled course contact hours.

## **6. Is the distinction between streamlined and general programs required?**

The current distinction between streamlined and general programs is required and, potentially, should be enhanced as part of this review. Removing the distinction could lead to many providers no longer offering studies in the costlier STEM units where expensive facilities like labs are required.

The key learning areas for generalist programs may need to be broadened/updated to reflect current domain groups (e.g. STEM, Art and Design, Humanities, Law and Business).

### **i. Should there be specified key learning areas, or more flexibility to deliver units designed to meet student needs/pathway course needs, with only the English language component as compulsory?**

Foundation Programs need to develop their own curriculum frameworks based on good practice pedagogy and these frameworks should be made available to students and the public. Specific KLAs should be required as these are meant to replace a Year 12 omnibus qualification. The following should be required:

- maths/numeracy
- science
- IT/technology
- arts/humanities
- 21<sup>st</sup> century skills should be embedded:
  - digital literacy
  - information literacy
  - time management
  - critical thinking
  - problem-solving
  - academic rigour and integrity

## Further feedback on proposed amendments

### Ensuring appropriate English language requirements

As stated earlier in this submission, English Australia disagrees that extended Foundation programs should have their entrance requirement raised to an overall IELTS 5.5 or equivalent score.

We also believe that sufficient measures are already in place to 'to ensure assessment outcomes for the academic English program are comparable to other criteria used for admission to the tertiary education course of study, or for admission to other similar courses of study'. We reject the need for retesting English levels with an external test, such as IELTS, when students complete the 'extended' program.

### Academic preparedness

The requirements of HESF Standard 5.4 should be included in the Foundation Standards. This will cover not only third-party provision of Foundation Studies providers onshore but also transnational provision of Foundation Studies Programs.

Partnership agreements between Foundation Program providers and University partners already form a written agreement and put in place processes for ensuring academic quality, for example through reporting and governance requirements of Academic Boards. There seems little need to further bureaucratise these by including them in the Standards.

Providers may be supportive of including assessment of overall university readiness, as this is one of the key learning outcomes of Foundation Programs. Foundation Studies Programs could have specific course learning outcomes that address university readiness including critical thinking and academic rigour and integrity. Course learning outcomes should be informed by the provider's curriculum framework and the Foundation Standards.

### Quality assurance and student support

We support the recommendation to replace 'exams' with 'significant formal assessment'. Pedagogy supports shifts away from high stakes exams and universities are increasingly following suit. The proposed shift would give Foundation Program providers the flexibility to align their practices and better prepare their students for what they will encounter in their destination degrees. This shift will also support current innovations in digital approaches to teaching and learning, assessment and student support.

### Consistency within the ESOS legislative framework

Providers are required by law to adhere to Commonwealth child safety requirements. Including this as a standard will not change the obligation to adhere to this legislation. However, providers are likely to be highly supportive of the creation of a new standard addressing the care and protection of Foundation students under 18 years of age. Although, if the future Standards seek to be applied offshore in transnational agreements, providers already quality assure against localised child safety laws.

The Standards could specify that Foundation Programs must be minimum of 20 face-to-face hours per week, but that the other requirements for standard Foundation Programs should remain – that is a minimum of 26 weeks and 720 scheduled course contact hours. The class contact hours could be on-campus or online according to agreed percentages.

English Australia supports the recommendation for providers to provide annual professional development for their staff, but alignment to teacher standards (e.g. VIT, AITSL) would be more appropriate.

### Next steps

English Australia would welcome the opportunity to discuss any of the points raised in this submission with DESE and contribute to the next steps in this process.

For further information, please contact the undersigned.

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