

## **About ISANA: International Education Association**

ISANA: International Education Association is the national professional association that represents people working with international students in Australia. It is a well-respected membership body that has provided services to international students and the professional staff who work with them since 1989. ISANA is a voluntary organisation, comprising a National Council, State and Territory branches and a general membership, with all office bearers elected by members. The association plays a key role in contributing to improving international student experience through policy and practice.

ISANA members work in universities, colleges and schools as well as with public and private organisations, making it unique as a cross-sectoral body engaging effectively with people working directly with students. Members are employed in administration, student support, compliance, policy, teaching and teaching support, in management and international education leadership roles as well as in service providers.

ISANA has a dynamic relationship with groups whose responsibilities connect with international students' experience. It has a demonstrated record of collaboration with relevant organisations such as student representative organisations, government agencies, accommodation providers, police, fire, health, insurance, emergency services, community organisations and guardians. It is therefore responsive to issues that arise such as cultural adjustment, academic progress, health and wellbeing, safety and security, as well as the needs of younger students.

ISANA has always taken an active interest in the development of government and institutional policy, and the impact of policy on international students. ISANA was granted a 2018 Enabling Growth and Innovations grant to develop an updated instructional Tutorial on the 2018 National Code and has also received grants for various international student support Projects under various Student Welfare Programs. It has engaged with government through a number of taskforce and consultative groups, contributing to dialogue relating to international student matters. It is through the above mission that ISANA comments on this consultation paper on Foundation Program Standards.

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

ISANA welcomes the opportunity to our their lens on the Department of Educations, Skills and Employments (DESE) discussion paper, produced to review the National Standards for Foundation Programs. This core piece of work was exciting to see occur given the relevance and importance to the sector, especially given the changing environment. However, it was concerning to identify a lack of balance within the core elements of Foundation Programs reflected in the discussion paper. A strong focus on the English language element, misrepresents the basis of the programs.

This lack of balance has the potential to cause a misrepresentation, not just amongst providers and the sector, but to also flow into the market causing an unwarranted concern about the value of such programs.

ISANA would welcome data driven and an evidence based approach to comparisons of Foundation Programs for International Student, and domestic cohorts. Given our members have grassroots experience working with both cohorts and observe those that attend programs around connection, and employability, go on to have a higher level of student experience and graduate outcomes.

**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?**

ISANA supports the National Code Standards stipulating that Providers are obligated to have procedures and policies in place for commencing younger overseas students. Providers must also apply to TEQSA for an exemption to enrol students under the age of 17 in Foundation Programs. Robust legislative frameworks warrant adequate safeguards in Australia for young people in which the Foundation providers are obligated to confirm.

Investigations could be made around the scope of more guidance on the approval procedures and policies for younger aged students (under 17) via exemptions already required from TEQSA, rather than the department given their role as the Regulator.

Consideration should also be given to regulating services other than just Providers to ensure students are not exposed to exploitative situations.

**3. Is there a need for ‘extended’ Foundation Programs? i. If so, how should the Standards apply to them?**

ISANA holds concerns should ‘extended’ Foundation Programs be introduced as there could be unintended Visa implications, in the sense of how long the student would then have to finalise their Post-or-Under graduate degree and the bonuses attached to commencing employment post-graduation. This could lead to Australia being seen as a less attractive country to choose from. It could be an opportunity for providers to opt for a packaged or embedded approach. Or even look for exemplars in the current outreach and pathways programs in the enabling courses that empower and support, for example, ‘first in family’ students.

**4. Should the Foundation Program Standards also regulate courses under 26 weeks?. If not, should providers be able to register these courses on CRICOS as ‘non-award’?**

ISANA recognises the value of 26-week courses, especially when there is an English Language component.

**5. Should online learning be a part of Foundation Programs? i. If so, how should this be specified? ii. What limits should be in place (such as course percentage or hours per week)? iii. How would consideration be given to the younger cohorts in Foundation Programs?**

ISANA recognises the significant adjustments and improvements that have been to online deliver.

However the following need to be considered:

- Hours of work
- Skills and credit transferred into future degrees

For younger cohorts the notion of online learning could prove extremely daunting and the lack of ‘present’ support and oversight from teachers could prove problematic. Issues including physical security, isolation, loneliness, and mental welfare could all be heightened.



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

ISANA would support courses that can demonstrate:

- Enabling course – set up to support students achieve their own success, ie. not just Academic success; and
- Benefits of the co-curricular including networks/ experience / employability.

Thank you for the opportunity to contribute to this important discussion.

Kind Regards,  
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