

**Submission to:** Department of Education

**Response to:** *Foundation Program Standards: Positioning for Quality, Success and Competitiveness*

## **Independent Higher Education Australia**

IHEA represents the majority of Australia's registered and accredited independent higher education providers (including independent universities) with campuses across Australia. IHEA members educate students in a range of disciplines including Law, Engineering, Agricultural Science, Architecture, Business, Accounting, Tourism and Hospitality, Education, and Health Sciences, Theology, Creative Arts, Information Technology and Social Science. IHEA members are higher education institutions with both for-profit and not-for-profit models and educate domestic and international students in undergraduate and postgraduate programs.

The Australian independent higher education sector comprises more than 130,000 students and 120 institutions, with independent providers variously accredited to offer courses across the full AQF range (Diplomas to Doctorates). Several IHEA members deliver Foundation Programs to international students.

Membership of IHEA is only open to providers that are registered with the Australian regulator – Tertiary Education Quality Standards Authority (TEQSA). Membership is also conditional on continued compliance with IHEA's Code of Good Practice.

**IHEA's primary goal is promoting equity, choice and diversity for all Australian higher education students.**

## ***IHEA's comments on Foundation Program Standards: Positioning for Quality, Success and Competitiveness***

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

Foundation Programs are an important element of Australia's tertiary education system and the international student experience. The discussion paper, *Foundation Program Standards: Positioning for Quality, Success and Competitiveness*, outlines some key aspects of the Foundation Program Standards and raises some points for consideration in the renewal of the Standards. Reviewing the Standards is an important activity to ensure that best practice operations, appropriate regulatory oversight and the highest standards of quality are maintained to protect the reputation of Australia's tertiary education sector.

The discussion paper, in identifying elements for consideration in the renewal of the Standards points to several questionable sources of concern, media reports and interactions between different elements of the education sector. These concerns, by the paper's own findings, are not borne out in the data or experience on the ground. IHEA questions the validity of concerns when they are not verified by more objective data. These concerns, therefore, should not be a basis for implementing changes to the Standards. Instead, changes should be made according to their likelihood of increasing the quality of the student experience and the successful operations of Foundation Programs to achieve their intended outcomes for the sector and students.

Accordingly, the basis of some of the proposed amendments around ensuring appropriate English language requirements are not sufficient to warrant making the changes proposed. For example, according to data provided in the paper, large percentages of Foundation Program students are already significantly more proficient in English than the minimum requirements. However, increasing that minimum will restrict Programs being offered to students who may otherwise, with the support of the Foundation Program be quite capable of developing the English levels and other skills necessary to meet the requirements of their higher education course. This change, then, is unlikely to significantly benefit the sector and so should not be made.

## **Comments on Proposed Amendments**

### **Ensuring appropriate English language requirements**

IHEA members are not supportive of the proposed amendment to include a requirement that “[f]ormal measures must be in place to ensure assessment outcomes for the academic English program are comparable to other criteria used for admission to the higher education course of study, or for admission to other similar courses of study.” This may lead to unintended restrictions on providers in practice and as part of the Foundation Program curriculum there should already be measures of the achievement of learning outcomes for the student.

IHEA members fear that the wording, as proposed above, will lead to IELTS retesting being considered the only measure and assessment seen to meet this requirement. Without flexibility for the provider to use alternative measures, may not be the most appropriate assessment. Other changes proposed in the discussion paper, such as the replacement of the term “exam” with “significant formal assessment”, demonstrate the need for flexibility in pedagogy and assessment. IHEA members support the change to allow for assessment other than exams to ensure their courses reflect pedagogical best practice on this basis. IHEA members do not support the restriction on the overall weighting being less than 40% as, again, this limits the ability for the provider to decide what is best practice in course delivery and assessment.

### **Academic preparedness**

IHEA members believe that the written agreements that are made with ‘receiving universities’ already have sufficient oversight through the normal processes of the development and signing of such agreements between institutions. There is support, though, for the inclusion of the assessment of overall readiness and the addition of critical thinking and academic rigour and integrity to the formal learning methods already listed in the Standards.

### **Modern delivery methods**

IHEA members also support ensuring digital and physical resources and support services, and the requirement that student progress reports should be available in an online format.

### **Consistency with ESOS legislative framework**

There is support from IHEA members for amendments to the Standards that include the addition of a Standard to align with that added to the ELICOS Standards in 2018 to ensure the welfare and protection of students under the age of 18. Members also support the inclusion in the Standards of a provision to ensure providers follow child protection legislation in the relevant state or territory as well as the Commonwealth child safety requirements.

IHEA believes there are sufficient controls on the hours of delivery in Foundation Programs and that imposing a minimum of 20 hours per week will reduce flexibility of delivery for providers who may wish to deliver the 720 hours in a different format.

IHEA members support professional development and the commitment of providers to continuous improvement and development of best practice. Members also see the benefits for staff, students and providers of guidelines around professional development. There may be, however, negative unintended consequences of being overly prescriptive in the Standards about how these activities should occur. Were this amendment to be made, there would need to be very careful consideration given to how this would be recorded, what professional development training was considered appropriate/acceptable or not and how to measure specific courses of professional development to ensure they meet the established criteria. The agency that conducted these assessments of suitability would also need to consider the additional resources required to do this work and their level of expertise in this area. It would be a problematic amendment, despite its desirability in many ways. It would be crucial to consider and consult on the detail of this amendment if it were to be taken further into the process of renewing the Standards.

## ***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?***

IHEA members believe that the minimum age requirement currently in the Standards is appropriate and that there is no reason to raise the minimum to 18 years, so long as proper safeguards are in place to ensure students' safety and well-being. Limiting the age of students undertaking these programs does not allow flexibility to deal with cases where a younger student would be perfectly capable and willing to undertake a Foundation Program with appropriate safeguards over their well-being (instituted by other proposed amendments discussed in the paper).

The justification for consideration of raising the minimum age, as provided in the discussion paper, is that secondary schools are concerned about students transferring from school programs into Foundation Programs. It is also made clear in the discussion paper that this concern is not borne out by data from PRISMS and so it should not be used as a justification for the change.

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

IHEA members can see the need for an 'extended' Foundation Program for students who may need additional assistance to progress into higher education courses. Students should be able to access the level of support they need to meet the requirements for further study.

IHEA supports the Standards that apply to Foundation Programs also being applied to extended programs. The Standards should be applied consistently unless there is a significant reason for them to be different. IHEA does not see that such a reason exists in this case.

Increasing the level of English proficiency required for these courses from IELTS 5.0 to 5.5 is not supported by IHEA members. The extended program should allow for additional language training and therefore, this is unnecessary and may prevent student cohorts needing this additional training from accessing the program. Where a need is identified for an extended program to develop the skills required for higher education course entry, the provider and student, through the program, should be given the opportunity to develop the necessary skills to meet those requirements on completion of the course not at the beginning.

The onus should be on the receiving institution to ensure the appropriate standards of English are being met on entry to the higher education course and this should provide sufficient checks on the Foundation Program provider to allow students to develop these skills.

#### ***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'?***

As with extended courses, shorter courses for preparation for higher education provide an important service and support for students who may not need a full Foundation Program to build their skills in order to meet the requirements for entry to a higher education course. Students at different levels of preparedness should be able to access programs that allow them to develop their skills to the necessary level to undertake the study they wish to. Therefore, there should be “standard” Foundation Programs, extended Foundation Programs and shorter preparatory courses to reach the widest range of students.

The key to having this range of courses available is the assurance that they are appropriately regulated and that they are named in a way that sends clear signals to market about what is being offered and delivered so that there is no confusion about the options open to the student and what they should expect from each course.

Providers should be able to register these as CRICOS “non-award” courses.

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

IHEA members strongly support making online learning a part of Foundation Programs. Modern education requires students to be digitally literate and these skills can be developed through online learning. In addition to this, there is an academic imperative in terms of access for students and to ensure pedagogical development.

As the sector develops proficiency in online teaching and learning, and all that entails – which is much deeper now than the original online learning offerings that were little more than correspondence courses run over the internet, is a significant offering for student both domestic and international and students should be offered access to study through this means. Providers are developing innovative and high quality online pedagogy and this should be recognised in the Standards moving forward to ensure that they reflect the current learning and teaching environment.

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

Restrictions on the quantum of online delivery allowed in Foundation Programs should reflect the needs of the student and their best interest. For younger (under 18) students, this may mean more “face-to-face” interaction is required than students who are over 18. The purpose of blended learning and an element of physical interaction with students is to ensure that cultural and social support can be offered, as well as the development of collaboration and teamwork skills. These purposes, and not arbitrary measures, should be considered in the imposition of any restrictions on online learning delivery in Foundation Programs.

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

See comments above.

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

See comments above.

***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?***

IHEA members can see benefit of streamed courses in certain cases, but these relate particularly to preparation for very specialist higher education courses, such as music and design for example, in order to tailor the learning and skills to these specific areas. The distinction between these two types of programs is worth retaining. The Standards, though, need to allow flexibility for providers to accommodate the needs of different students and not necessarily be restricted into either a generalist or streamed program.

We thank the Department for the opportunity to comment on the Foundation Program Standards review.

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