



Foundation Program Standards – response to consultation paper

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

The current standards (2011) have served the Foundation Programs sector well since their inception, maintaining a suitable quality assurance framework and ensuring that non-compliant providers cannot maintain a registration. The ongoing maintenance of the compliance elements within the current framework is positive for the industry and some of the additional standards explored within the paper could help to strengthen the quality of foundation programs even further. While supporting these additional standards to enhance the quality of foundation programs, Trinity also feels that there is an opportunity to give reliable providers of high quality programs increased flexibility in delivery of curriculum, particularly for online provision of teaching and student support.

If such changes are to be implemented, Trinity College would welcome the opportunity to assist with drafting of the new 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 of TEQSA, appropriate?

Trinity College believes that the current settings as listed within the question are completely appropriate. Trinity strongly opposes any increase to the minimum age required for commencement of studies believing that this would prevent access to foundation studies programs by young students who can complete such studies. Furthermore, in the absence of evidence of harm to under 18 students and the considerable evidence of successful completion of programs, there is no empirical evidence to support such a change.

Trinity has enrolled students from 16 years of age for many years and has demonstrable success in enabling them to adapt to the Australian education environment and matriculate to the University of Melbourne. Trinity believes that a student's prior academic performance, which is clearly indicative of their ability to be successful in a foundation program, should be the key factor in determining whether they are granted admission to a program, not their age. It is also important to note that the university sector does not require that students are 18 years of age at the commencement of their undergraduate study. It therefore does not make sense that a pre-university sector should implement such a regulation.

Trinity College invests a considerable amount of time and resources into providing a comprehensive care and wellbeing program for both its under 18 students, as is required under the ESOS National Code, and also for its over 18 students. Those who commence their foundation program at 16 or 17 years of age are monitored and supported by wellbeing staff, accommodation supervisors, nurses and counsellors. Trinity has in place a formal student wellbeing plan in which each enrolled student is provided with a bespoke, individualized and monitored well-being program.

Trinity places a premium on pastoral and well-being care, has student support systems in line with ESOS requirements and therefore strongly supports the inclusion of a new standard to address the care and protection of Foundation Studies students under 18 years of age.



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

Trinity College believes that there is still a need and a place for extended Foundation Studies programs within the suite of non-award programs. While additional English language support and preparation are often what is required most by international students, there are some cohorts of students who require additional preparation within other academic areas. Extended programs are appropriate for such students.

Trinity College used extended programs for many years to support students from some target countries or from particular curriculum backgrounds to ensure that they had the necessary time in college to build both their English language proficiency and target degree specific subject knowledge to make a successful transition to undergraduate study. While we do not currently teach an extended program, Trinity believes that new Foundation Program markets may arise in the coming years for which an extended program might be appropriate.

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

While Trinity College does not currently deliver any accelerated programs under 26 weeks in length, it would be something that we would consider doing if an appropriate pathway to the University of Melbourne became available. As such, Trinity supports the proposal to move such programs into the category of programs regulated by the Foundation Program Standards. Making this change would ensure that such programs were governed by a similar set of regulations to other non-award programs that lead to undergraduate entry within higher education institutions.

**5. Should online learning be a part of Foundation Programs?
i – If so how should this be specified?**

Trinity College supports the inclusion of online education as a component of foundation programs. It is important that foundation students receive an education that reflects the university environment and the wider world they are moving into. Today, much of the educational, intellectual and business world operates in an online format, and students need an education that reflects that space, providing them with the opportunity to acquire these technical skills to be university-ready and ultimately, job-ready. However, high educational standards need to be maintained in this space so providers need to ensure that in relation to online activities they:

- Actively collect data and feedback from students about online experiences and show response to it
- Maintain a strong teacher presence within online learning
- Ensure they use actively curated online activities
- Consider the social aspects of online education
- Provide dedicated eLearning staff to lead and support online learning
- Ensure that the online component has demonstrable pedagogical underpinnings
- Provide professional development and training for staff
- Deliver orientation programs to support online student engagement

The notion of 'actively curated online activities' is new and potentially very important. By this, we mean that FS providers are required to have an evidence base demonstrating that students are given constructive, formative and timely feedback on such activities and are properly monitored during online activities. The digital trail associated with such activities could involve LMS analytics and class attendance logs. In essence we are suggesting that providers should maintain some evidence base that the online learning is an active engagement with individual students, rather than a form of anonymous engagement, such as MOOCs.



ii – What limits should be in place (such as course percentages or hours per week)?

Trinity College believes that in a normal foundation program no more than 25% of the hours delivered in the program should be available for online delivery. The material delivered in those hours should be of a high quality and adhere to the principles outlined above. The college holds a belief that if given the flexibility to deliver those elements of the program which are most suited to digital delivery in an online format, the overall educational experience for the student could be improved. By giving providers the opportunity to count these hours as part of those delivered it would also encourage them to invest quality time and money into the design of such curriculum rather than viewing such online learning activities as add-ons to the face-to-face learning which is delivered.

While Trinity does not believe that wholly online foundation programs can be delivered to the same standard as in-person courses, if this was something that the Department of Education, Skills and Employment were considering there are a number of issues that should be considered.

Engaging students in the online space is challenging and requires a different and more strategic approach to teaching than in the physical classroom. For example, online students require much more guidance and instruction from their teachers, not only in completing activities, but also in connecting with their peers and working effectively in groups. Maintaining a prominent teacher presence is critical in the online space, as is fostering the social aspect of learning for the student. It is essential that there be ongoing training programs for staff to enable these aspects of online learning.

Although teaching online has shown us that this mode of education is possible, it is important to ensure that the online programs or components are appropriate and effective. Any wholly online program needs to have strong pedagogical underpinnings. It needs to be an educational asset, and not a cost-saving measure. Wholly online programs should emphasise learning as a social activity and not leave students isolated. There is the danger of an online program becoming a passive and non-engaging mode of education. Such online courses have contributed to the poor reputation and inferiority of online education. If wholly online programs are being considered in any form, such programs must be highly regulated with strict standards to ensure the quality of online Foundation Programs.

iii – How would consideration be given to younger cohorts in Foundation Programs?

While Trinity has a clear student code of conduct and expected learning behaviours for students to adhere to, this code of conduct has been updated in the past eighteen months to reflect the particular challenges that can arise for students and teachers in the online space. If online components form part of a foundation program's teaching and learning program, student codes of conduct must reflect how students and staff are expected to interact within this medium. These standards apply to both under 18 and over 18 students but provide an additional layer of support for younger cohorts of students.

Whether online teaching and learning processes form part of a particular providers program or not, student support services and wellbeing support services should be available for all students in an online format to enable them to access support when and where they require it. Information about how to access these support services and the type of behaviour that is expected in the online format should also be provided within student orientation programs at the commencement of the course.

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

While Trinity College does not currently label any of its Foundation Programs as streamed it has no concern about other institutions doing so. Within Trinity's generalist programs, which contain broad academic offerings, students naturally stream their academic program based on their undergraduate degree of choice. This takes place due to the necessity to complete pre-requisite subjects but also



because students naturally gravitate toward academic subjects which will deliver them the knowledge and skills that will be most useful in their degree of choice.

If Foundation Programs do not offer the student the ability to choose subjects, instead requiring them to complete a set group of academic courses, Trinity believes that such courses should be clearly labelled as streamlined or set programs.

Additional recommendations and feedback

1. Trinity College supports the recommendation within the paper that providers must provide annual professional development to those who teach within the programs. The college supports this recommendation on the understanding that each provider is able to maintain a degree of control over what it deems to be appropriate professional development for its staff rather than having an external body which governs what is and is not appropriate professional development.

While the importance for teaching staff to continually build upon their skills through ongoing professional development [PD] is widely recognised, the COVID experience has highlighted that consideration should now be given to looking beyond providing 'ongoing PD' and consider the introduction of an 'annual program' of PD for Foundation Studies [FS] staff, similar to that stipulated in the ELICOS Standards. This would ensure that staff always remain current in the areas of pedagogy, teaching students from non-English speaking backgrounds and areas such as online delivery and digital tools training. The use of digital tools, in particular, is already part of FS Programs and higher education studies and requires that staff remain up to date with the evolving updates.

An 'annual PD Program' in FS Programs could incorporate similar standards to those outlined in the AITSL standards. For example, such a PD Program could include something like **Standard 6**: Engage in professional learning and **Standard 7**: Engage professionally with colleagues, parents/carers and the community.

2. Trinity College supports the notion that providers maintain written agreements with partner universities to ensure quality assurance of the curriculum and programs, and to establish entry standards which ensure that students who are admitted to the higher education institution are adequately prepared to do so. The college is concerned, however, if providers are asked to prepare reports that "assess overall university readiness." Australian secondary schools are not required to complete any such reporting and it is unclear how a student's overall level of readiness would be assessed outside their performance in academic subjects.
3. Trinity College is supportive of the move to ensure that providers include explicit attention and focus on critical thinking, academic rigour and academic integrity within their programs. Each of these intellectual areas are important to students achieving success within their undergraduate programs.

One of the reasons for the success experienced by students of Trinity, once they commence undergraduate study, is that they not only study subjects that prepare them for their specific course at university, but also ones that teach them to read and think critically about language. This is important preparation for university and the online world. Teachers and academics are now arguing that language-based critical thinking skills are *even more important* in the online space. This is a space that is awash with language – unregulated, untested and in some instances insidious and manipulative.

The best defense with which we can arm our students is a critical understanding of language – not just how to use it academically, but also where it originates, how it can be used to manipulate and how to use it to develop an interpretation.



4. Trinity College is supportive of a move to replace references to “exams” within the Standards to “significant formal assessment”. The necessity to use a range of alternate formal assessment procedures during the past eighteen months has shown Foundation Studies educators the value of using a range of assessment structures in a way to ensure consistent formative feedback to students. This is something that should be maintained post Covid-19. Trinity would also support the move to require that no more than 40% of overall assessment in each academic subject be allocated to examinations.
5. Trinity College asks that representatives from the larger providers of Foundation Studies within Australia be included within further consultation processes and within the drafting of the new Foundation Program Standards. As such, Trinity would be happy to provide a representative to take part in such processes to ensure that key stakeholder ideas and interests are appropriately considered.