Submission to the Foundation Program Standards consultation

Institution

[Redacted]

Name

[Redacted

Position

[Redacted]

Sector of delivery (e.g. Higher Education, VET)

[Redacted]

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

The paper treads rather gently across the deficiencies in the current Foundation National Standard and yet it does highlight some of the most acute of these deficiencies. I believe that there needs to be more prescriptive regulation across the range of areas highlighted in the paper and hope that the outcome of the paper will limit the ways providers are able to interpret the standards. English language admission requirements and associated requirements relating to the demonstration of students language outcomes needs to be firmer. Foundation programs attract a large number of students who have achieved poor results in English language training in their home countries and elect Foundation programs over Diplomas or Bach. because of the low or lax entry requirements. Students can be admitted with IELTS 5.0 and the standard ignores the impossibly of developing language by IELTS 1.5 - 2.0 band scores (to 6.5 or 7.0) over the duration of the Foundation program where English training is limited to 200 hours of instruction, under the ELICOS standard this equates to an increase in IELTS 0.5 band increase.

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?

Younger students can find the demands of Foundation programs too challenging. While homestay and other accommodation programs can offer the students emotional and familial support a growing number of students are presenting with mental health issues that may not occur if they were in their home country living in supportive environment. This is not always an age or maturity issue but less experienced students have fewer defences to call upon. I believe that students should be 17 years of age as a minimum and there to be no exemption available.

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

There is a need for tighter control around English language ability on commencement. The extended programs offer an additional period of study which would be extremely valuable for students with IELTS at 5.5 of these students could study English full time for the first 10 - 20 weeks and then move to the Academic component of the Foundation program. Low levels of English competency are the greatest impediment to student success in Foundation program. if they are equipped with the language in the first months of study then future academic studies with embedded literacy program.

I advocate a model where extended program are available for students will IELTS of 5.5 / Standard program for students with IELTS 6.0 min (academic qualifications should be same for extended and standard) where the extended session is ELICOS and the Foundation academic program contained with the normal standard sessions.

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'?**

Currently Channel partners (education agents) and applicants shop around to find the best deal in terms of admission requirements and course duration. National standard suffer due to the flexibility allowed in admission requirements and course duration. Al providers are under pressure to maintain enrolments and be competitive. This places onerous pressures on academic department to maintain quality under commercial pressures. Shorter programs, often labelled as 'Transition programs' can be very effective for students with borderline qualifications but unless these programs are regulated they are best to be eliminated on CRICOS.

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?

i. Contemporary learning must employ technology to engage students in their learning. So programs needs to deliver high quality blended curricula where learning management systems can improve the student learning experience and students engage with asynchronous learning to build their independence as HE prepared adult learners. So Blended learning should be specified- a combination of the best of face to face and online learning.

ii. The hours per week in the current standard are onerous and can result in time spent spoon feeding student through their assignments. This isn't High School and student preparing for HE study need to develop independence and self reliance. 30% of learning could be asynchronous and 70% face to face or remote via LMS and Zoom.

iii Programs should be required to have a compulsory social program timetabled across the study session for all students but younger students academic performance should be closely monitored to ensure they engage in their learning and with other students.

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

Key learning areas that relate to the National Secondary Curriculum should be specified. I don't see this at particularly limiting as it allows students to have a broader educational experience to supplement their lack of a Year 12 experience. Both generalist and streamlined programs can follow key learning areas. The difference comes in the weighting of these KLA.

Alongside the KLA should be HE competencies that prepare students for HE study but these should ideally be embedded through the assessments within the KLA.