

## 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?

We have used this section of the consultation submission form to address the items raised in the consultation paper that have not been specifically addressed in this form.

- Require providers to implement an annual program of professional development for teaching staff which includes teaching students from non-English speaking backgrounds - we support this amendment. Greater teacher understanding of how students develop language, in particular, would be valuable. However, the Standards should not be too prescriptive to impose, for example, minimum training hours or targets on individual teachers. Rather, requiring providers to implement an annual training program with the expectation of staff participation is preferred.
- Specify Foundation Programs must be a minimum of 20 hours per week - we partially support this proposal. A minimum of 20 contact hours per week is suitable where a Foundations program is solely delivered face-to-face, however, we are mindful of the potential inclusion of blended learning opportunities where mandating a minimum of 20 contact hours per week may not be suitable. In these cases, the number of hours needs to be determined on the balance of synchronous and asynchronous delivery.
- Include a requirement that 'Formal measures must be in place 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 do not support this proposed amendment. Foundation programs provide a holistic approach to education that develop a range of skills and capabilities that prepare students for undergraduate study. They provide students with an alternate entry pathway to university. Imposing formal measures that are comparable to existing entry criteria contradicts this 'alternate entry pathway' ideology. It also promotes an outdated ideology with respect to English language skills and ability that tests individual discreet items in language which is too narrow and fails to reflect the nature of Foundation programs where a range of subjects work together to build English language and academic skills simultaneously. [Identifying information redacted] Our Foundation Program performance tracking data shows that our students perform well compared to domestic students. Accordingly, we do not believe that there is a need for formal measures to be implemented.
- Ensure access to digital and physical resources and support services - we support this proposed amendment.

- Require student progress reports to be available in an online format - the consultation paper fails to elaborate on what a 'progress report' comprises and accordingly, we are unsure whether to support this proposed amendment. We support the availability of results and assessment feedback being made available online, however, do not support the compilation of additional individual student reports.
- Replace references to 'exams' with 'significant formal assessment' - we support this proposed amendment.
- Require that exams should not form more than 40% of the overall assessment weighting - we do not support this proposed amendment. This is too prescriptive to cover the range of subject areas covered in Foundation Programs, especially where certain subject areas, such as maths, are more suited to summative assessment. Alternatively, the Standards could prescribe final exams or any single assessment can only comprise a maximum weighting of 40%, to ensure that a range of assessment items are considered.
- There is an opportunity to consider whether students' English language proficiency should be re-tested after foundation courses are completed and before commencement into students' chosen course of study - we do not support this proposed amendment. We track Foundation Program student performance at university and can see that students are performing well and on par with domestic student cohorts and meeting their tertiary study objectives. English language testing to 'confirm' a level has been achieved after the successful completion of a Foundation Program is too narrow and fails to reflect the nature of Foundation programs where a range of subjects work together holistically to build English language and academic skills simultaneously. Recommendation: the Standards should require a dual-responsibility of Foundation program and receiving providers to monitor Foundation program student performance in their first year at university with oversight from the academic governing body to assure the quality of teaching and learning and improving performance where an issue is identified (similar to the obligation imposed on Higher Education providers by the Higher Education Standards Framework (Threshold Standards) 2015).

**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?**

Yes, the current minimum age requirements are appropriate. We also support the inclusion of an additional Standard on the care, welfare and safety of overseas students under 18, consistent with the ELICOS Standards and National Code.

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

Yes, the two (2) existing Foundation Studies curriculum options of a Standard and an Extended program, with existing minimum IELTS entry requirements, work well to accommodate students at varying levels of ability at entry. The existing English language proficiency level for entry to a Standard Foundation Program of IELTS 5.5 (minimum 5 in all skills) or equivalent, and an overall score of IELTS 5.0 for Extended Foundation Programs remains appropriate. We do not support an increase in the minimum IELTS score for Extended programs from 5.0 to 5.5.

With respect to the proposed option of replacing the Extended Foundation Program with a packaged ELICOS and a Standard Foundation Program, we believe there is space in the market for ELICOS to be packaged with the Standard Foundation Program, however, do not believe this should replace the Extended program. This option should co-exist as an additional option, particularly for students who may have achieved the required academic standard for Foundation entry but significantly lack

English language skills. The choice of Foundation option (ie, Standard, Extended or packaged with ELICOS) is ideally based on the needs of the student. Another consideration is whether the institution offers standalone ELICOS programs - if not, replacing the Extended program with a packaged ELICOS and Standard Foundation program would not be a suitable for these providers.

**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'?**

Yes, in addition to the ESOS regulatory framework, the Foundation Program Standards should also regulate Foundation courses under 26 weeks in duration. It was somewhat concerning to see how many Foundation 'Express'/'Accelerated'/'Rapid'/'Fast Track' courses already existed without the additional student protections afforded by the Foundation Program Standards. Such 'accelerated' Foundations programs should have an IELTS entry requirement of 6.0 and possibly a stipulated minimum academic entry requirement to ensure that students enter at an appropriate level that ensures the shortened program of study adequately prepares them for further study in higher education programs.

**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?**

Yes, online learning should be included in Foundation Programs. Suitable delivery modes include face-to-face and blended delivery, with blended delivery ideally comprised 30% online and 70% face-to-face but include a minimum 60% face-to-face to enable flexibility but also recognise that a strong emphasis of face-to-face delivery is preferred for Foundation Program cohorts. 100% online delivery is not recommended. With the online delivery component, there needs to be in-built assurances for students to build connections with their institution and teachers, including periodic check-ins. This would also assist in addressing any concerns with younger cohorts. If offshore remote delivery is considered, synchronous delivery with an offshore partner is optimal, with 60% face-to-face and 40% online delivery.

**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?**

We believe that the distinction and inclusion of both streamed and generalist program options are valid and we support the continuation of both programs as it provides greater flexibility for providers to tailor their Foundation Program offerings to suit the receiving institution, especially in cases where entry requirements to some degrees require additional focus in particular subject areas, eg, Engineering requires a higher standard of maths and physics than other degrees where a generalist Foundations program would be suitable.