

Submission to the Foundation Program Standards consultation

Institution

Canning College

Name

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Position

Principal

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

Multi-sector

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

As a State Government education provider and having delivered the WA Universities' Foundation Program on behalf of Western Australian universities since 1992, Canning College is proud of its reputation for providing excellent education programs and student support, which lead to positive academic outcomes. We have long-standing relationships with the University of Western Australia, Curtin University, Murdoch University and Edith Cowan University and in recent years have also established a formal agreement with the University of Notre Dame Australia.

We welcome the opportunity to provide input and appreciate the work done in producing the paper Foundation Program Standards: positioning for quality, success and competitiveness.

We support the Department of Education, Skills and Employment in its efforts to renew the Foundation Program Standards to better align with current expectations and conditions but also acknowledge the immediate challenges associated with COVID-19 travel restrictions. Unless stated, these responses assume a return to normal travel conditions and the resumption of international student recruitment into programs delivered onshore.

Aside from the specific answers provided, Canning College offers these initial statements:

- Canning College fully supports 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.' (page 7, Foundation Program Standards: positioning for quality, success and competitiveness). Currently, all WA Universities' Foundation Program students are required to study the subject English Language and Australian Cultural Studies (ELACS) for 9 hours a week for the duration of the WAUFP. At the end of the program, students sit a final exam that is conducted and assessed by an external body (Tertiary Institutions Service Centre (TISC)). Students must achieve a minimum of 50% to gain university entrance.
- Canning College does not believe there is a need to increase from 5.0 to 5.5 the minimum IELTS score for 'extended programs'. IELTS 5.0 is an adequate level for students who will be exposed to English language learning for a longer period.
- As an education provider with established formal agreements with Western Australian universities, Canning College fully supports the notion that providers are required to have written agreements with universities that affirm the program 'adequately prepares the

student for higher education programs.’ (page 7, Foundation Program Standards: positioning for quality, success and competitiveness).

- Foundation Program providers should be required to use external and independent assessment methods to determine student outcomes as part of their preparation for tertiary studies. ‘Overall results’ combined with an understanding of a student’s personal capabilities can be used to determine a general readiness for tertiary studies and providers should be prepared to work with university admissions staff during assessment of student suitability. Ultimately, universities are best placed to understand the readiness of a student for a specific degree program.
- Canning College fully supports a requirement for providers to include specific attention and focus on critical thinking, academic rigour and integrity in addition to formal learning methods.
- In terms of quality assurance and student support (page 8, Foundation Program Standards: positioning for quality, success and competitiveness), Canning College believes it is imperative that providers:
 - Ensure access to digital and physical resources and support services
 - Require student progress reports to be available in an online format
- Canning College objects to the replacement of ‘exams’ with ‘significant formal assessment’. Exams are widely recognised in Australia and overseas as an important part of the assessment process. The use of exams to determine student outcomes assists in emphasising the academic qualities of a Foundation Program. The introduction of a new term such as ‘significant formal assessment’ can be confusing to students and parents, whose first language is often not English.
- Canning College does not support a requirement that ‘exams should not form more than 40% of the overall assessment weighting’. (page 8, Foundation Program Standards: positioning for quality, success and competitiveness). Exams are an important part of preparing students for the rigours of tertiary studies and assessing their overall progress in a Foundation Program. Canning College strongly suggests that ‘exams should not form more than 50% of the overall assessment weighting’. This would more closely align with other programs such as WACE and VCE and provide the necessary flexibility.

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?

The National Code of Practice for Providers of Education and Training to Overseas Students 2018 already provides the regulatory requirements for providers who enrol students aged under 18. Standard 5 - Younger Overseas Students sets out that ‘registered providers of overseas students aged under 18 must meet legislative or other regulatory requirements relating to child welfare and protection’. It makes clear the actions providers must take to ensure students are appropriately accommodated and cared for.

In the interests of setting nationally consistent standards in accordance with the Education Services for Overseas Students Act 2000 (ESOS), Canning College believes The National Code Standard 5 – Younger Overseas Students – already provides a rigorous and appropriate level of guidance. Canning College, whose current student population studying the WA Universities’ Foundation Program includes 35% aged under-18, regularly enrolls students aged 16 years, with TEQSA approval. Given the robust ESOS legislative framework, Canning College considers it appropriate to lower the

minimum age requirement to 16 years without the need for further approvals. Endorsement by TEQSA of each individual student case adds only an additional administrative layer without any evidence of providing further protection of minors than is already clearly set out in National Code Standard 5 – Younger Overseas Students. In many countries, at age 16 students have completed the equivalent of Year 11 studies and are ready to progress into Foundation Programs. These students would be precluded from enrolling in Foundation Programs for at least a year after they have already achieved academic entry standards. Canning College is strongly opposed to increasing the minimum age as it would be detrimental to the progression of these students and impact negatively on enrolment numbers.

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

There is a need for extended Foundation Programs as some students are not ready to commence a standard program. Canning College firmly believes extended Foundation Programs should be subject to the same Foundation Program Standards to ensure industry-wide consistency.

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 an experienced provider of a successful Foundation Program, Canning College believes the high standards of academic rigour currently applied to Foundation Programs require a minimum of 26 weeks of high-quality delivery. Attempts to deliver the same high standard in fewer weeks would result in poorer academic outcomes and impact negatively on student success rates at university. Foundation Programs should maintain high academic standards by retaining a minimum 26-week duration and any program that requires less than this minimum should not be considered a Foundation Program and should be prevented from marketing as such. There are existing pathway-to-university programs, such as VET courses and university-specific entry programs, that require fewer weeks/hours to complete. In many cases, these programs do not require students to have the same level of academic ability as Foundation Program students.

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?

During the COVID-19 pandemic, online learning has been critical in the continued education of international students. Canning College has been successful in moving its programs, including the WA Universities’ Foundation Program, to an online mode of delivery. Our method is live and interactive with students required to login according to a specific timetable, turn on web cameras and engage directly with teachers and students in real time. The response to the delivery of this program has been overwhelmingly positive. However, the true value to international students of studying a Foundation Program is the opportunity to have a real-life experience of Australia, which can only be delivered by being in country.

In-class, face-to-face teaching is a more effective way of delivering the Foundation Program and also allows providers to better monitor student progress and welfare. Crucially, English language improvement is easier to achieve when students are educated in an English-speaking environment.

The online delivery of education programs to international students must continue at least until the pandemic is under control and travel restrictions are relaxed. As outlined above, face-to-face, on-campus learning is most effective and the preferred method at Canning College. However, it would be appropriate to allow some online teaching of Foundation Programs on a permanent basis up to a

maximum of 30% of the program, as has previously been permitted, where a student is unable to commence a program on the start date due to visa or travel issues.

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?

Yes, the distinction between streamlined and general programs is required to provide clarity in the market.

The WA Universities' Foundation Program provides entry to multiple universities. Students choose units that provide the background for their intended future degree so it is essential that this flexibility is maintained. The English language component must remain compulsory with the assessment of outcomes made via formal measures as indicated in question 1.