

Submission to the Foundation Program Standards consultation

Institution

Council of International Students Australia

Name

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Position

National Secretary

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

Higher Education and VET

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

In principle, CISA supports measures that would safeguard and increase the quality of international education in Australia. International students are entitled to expect high quality education from Australian institutions regardless of level of study and whether they are onshore or offshore. The public reputation of the international education sector also depends on its quality.

At the very minimum, CISA urges the renewal of the Foundation Program Standards beyond its 1 October 2021 sunset date. Our further submissions are outlined in our answers to the other discussion questions below.

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?

We submit that the current minimum age requirement of 17 years or 16 years with the approval of TEQSA is appropriate, provided that the standards are amended to address protections and care for under 18 years of age. We support the alignment of the standards with the Commonwealth Child Safety Framework, as well as with any relevant Commonwealth, State and Territory child protection legislation and requirements.

We should note that we are not opposed to the alternative suggestion of raising the minimum age for Foundation Studies students to 18 years. However, we do note that this option would likely be incongruous with the nature of the Foundation Program as it is currently stands. As noted by the consultation paper, Foundation Programs could serve as an alternative for an Australian year 12 study and is open to those who completed an equivalent of an Australian year 11. If so, the new minimum age would exclude many who are currently eligible to join the program and delay their transition to Australian higher education.

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

We submit that there is a need for an extended Foundation Programs to help students meet the academic or English requirement to enter the standard Foundation Program and their target higher education degree programs. As a matter of equity, it must be recognised that students can fail to meet these requirements for a variety of reasons. Further, standardised testing such as IELTS may be a blunt tool to measure English competency. It is also likely that the best way for these students to

meet these requirements may be to study in Australian institution with an Australian-designed curriculum.

We submit that the Standards should apply to them as well.

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'?

The Standards should also regulate courses under 26 weeks.

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?

Foundation Programs should aim to adequately prepare students for higher education studies in Australia. We submit that the best way this can be achieved is through an onshore, on-campus learning. However, online learning should be allowed to be part of Foundation Programs given the circumstances imposed by COVID-19 and changes in modern learning. However, we submit that online learning should only be resorted to if the institution has decided that online teaching will leave their students better off overall academically.

Further, unless the circumstances do not permit on-campus learning, we submit that teaching in Foundation Studies programs should also be predominantly conducted on-campus / offline. If the providers had to switch to fully or predominantly online teaching for a Foundation Studies course that are meant to be on-campus and offline, they should also not be allowed to charge the same or a higher price.

Where implemented, the impact of online learning on the academic progression and mental health of the Foundation Studies students should also be constantly assessed. Adequate academic and counselling support should be made available, particularly to younger cohorts.

**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 submit that it is difficult to argue generally whether the distinction between streamlined and general programs are required or not. It is up to the universities and higher education institutions to determine the academic requirements to join their courses, and the need for a streamlined or general foundation programs would mostly depend on each institution. A particular institution may require a holistic education, while others may value specific expertise.

We do submit that foundation studies providers must be allowed sufficient ability to tailor their program to meet the academic requirements that a particular student would need to meet to be admitted to a course.