

Submission to the Foundation Program Standards consultation

Institution

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Name

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Position

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

Higher Education

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

National Standards should also regulate international foundation programs so long as they are used as basis for university admission.

Possible Amendments:

Ensuring appropriate English language requirements

- 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'

Response: This would bring Foundation Programs into alignment with the requirement for ELICOS programs under Standard P4.1c(ii) of the ELICOS Standards 2018. We consider this to be a reasonable measure to help ensure appropriate English language requirements, as long as it provides scope/flexibility in terms of the ways providers can demonstrate outcome comparability.

- Increase the minimum IELTS score 'for extended programs' from 5.0 to 5.5

Response: Although an IELTS of 5.0 is not a high level of English with which to commence a Foundation Program which requires students to develop knowledge and skills in different disciplines through English, if the program takes a staged approach where there is a greater focus in the earlier stages on the English language development required for discipline related studies and less on the actual acquiring of discipline knowledge and skills, then the current standard should be adequate.

It is, however, recommended that the Standards' reference to IELTS should be expanded to 'IELTS or equivalent' to include other nationally accepted English language proficiency tests.

- Consider whether the minimum IELTS score for standard programs is appropriate.

Response: As above, although a 5.5 IELTS is not a high level of English with which to commence a standard Foundation Program, if the program takes a staged approach where there is greater focus in the earlier stages on the English language development required for discipline related studies and less on the actual acquiring of discipline knowledge and skills, then the current standard should be adequate.

It is, however, recommended that the Standards' reference to IELTS should be expanded to 'IELTS or equivalent' to include other nationally accepted English language proficiency tests.

Academic Preparedness

- Providers who have a relationship with one or more 'receiving universities' require a written agreement from the university that the offered curriculum adequately prepares the student for higher education programs.

Response: Adding the requirement of a more specific written agreement that specifies that the program needs to be 'fit for purpose' should help to ensure providers are supporting Foundation Program students to reach the required level of English and academic skills for higher education program study.

- Under 'overall results', providers must assess overall university readiness.

Response: Making this a requirement should lead Foundation Program providers to ensure they develop courses that teach and assess a wider ranges of skills that are critical to University studies, such as analytical, group work and independent learning skills.

- In addition to formal learning methods already listed in the Standards, providers must include explicit attention and focus on:
 - critical thinking
 - academic rigour and integrity

Response: Specifying key learning areas in the Standards would help to ensure that these skills receive adequate attention. Determining which skills are 'required' would be the challenge, as leaving out any key skills could lead to providers giving them inadequate focus.

Quality assurance and student support

- Ensure access to digital and physical resources and support services.

Response: Agree that specifying the need to ensure access to both digital and physical learning resources and support services will help to ensure that students in Foundation Programs are being prepared to use the resources of a modern classroom.

- Require student progress reports to be available in an online format

Response: Perhaps this suggested amendment is too specific and instead could be widened out to require 'student feedback and assessments to be available online'.

- Replace references to 'exams' with 'significant formal assessment'.

Response: This looks to be a reasonable adjustment which will provide greater flexibility for providers to apply modern assessments that are best suited to the specific learning activities of the program.

- Require that exams should not form more than 40% of the overall assessment weighting.

Response: Setting a maximum requirement that exams do not form more than a certain percentage of the overall assessment will encourage providers to provide students with a wider range of

assessment types and should encourage the implementation of a wider range of modern assessments, but setting the maximum at 40% may be too restrictive.

- Consider whether the distinction between streamed and generalist programs is appropriate.

Response: The current Standards' distinction between streamed and generalist programs, as described in the Discussion Paper, provides a good balance between flexibility in designing streamed programs while ensuring the integrity of generalist programs.

Consistency within the ESOS legislative framework

- Create a new standard addressing the care and protection of Foundation students under 18 years of age.

Response: In order to address concerns for the safety of students under the age of 18 studying in Foundation Programs, it makes sense to bring Foundation Programs into alignment with ELICOS Programs with regard to this by applying an additional Standard on the care and safety of overseas students under 18 consistent with that of the ELICOS Standards.

- Specify providers are required to follow the relevant child protection legislation in their state or territory jurisdiction and/or comply with any relevant Commonwealth child safety requirements.

Response: The inclusion of this amendment would clarify for providers the child safety requirements that apply.

- Specify Foundation Programs must be a minimum of 20 hours per week.

Response: Making it clear what number of hours constitutes full-time delivery in Foundation Programs would create a clear minimum standard.

- Require providers to implement an annual program of professional development for teaching staff which includes teaching students from non-English speaking backgrounds.

Response: Such an amendment would likely help to raise teaching standards generally and ensure that PD in 'teaching NESB students' is catered for. Aligning the professional development requirements with those of the ELICOS Standards look to be a good way to ensure this set a minimum standard.

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 success of the Foundation Programs, and the point of differentiation with high schools lies in the more mature cohort recruited to the programs therefore the current age requirement of 'at least 17 years' should remain. Younger students will require more pastoral care, and will be mixing with adult students who may be engaged in adult activities such as alcohol consumption which could be detrimental to their health and wellbeing.

It should be noted that the ESOS National Code requires providers to have policies and processes in place for enrolling and supporting younger students. We consider the current minimum age requirement to be appropriate but feels that the two adjustments outlined in the discussion paper (1) 'a new standard addressing the care and protection of Foundation students under 18 years of

age’ and (2) the Standards ‘Specify providers are required to follow the relevant child protection legislation in their state or territory jurisdiction and/or comply with any relevant Commonwealth child safety requirements’ would act to further clarify and strengthen requirements.

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

Extended Foundation Programs can cater for students who do not meet the English language and/or academic requirements for entry into standard Foundation Programs and can, therefore, support students who have weaknesses in key English language skills and/or important pre-requisite academic knowledge and skills. Well-structured extended Foundation Programs can provide appropriate support and development of both English language and academic skills for such students and, as such, should be explicitly included and referred to under the Foundation Program Standards.

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’?

Foundation programs are meant to adequately prepare students for tertiary studies, students sometimes forgo Year 12 and undertake a foundation program instead. It is hard to imagine how a full year’s worth of studies can be condensed to 26 weeks and yield the same quality outcome. Courses under 26 weeks should not be in the realm of foundation programs nor should they be called as such. It causes confusion and may be detrimental to students.

Ideally, all enabling courses should satisfy generalised standards, however, the Foundation Standards are quite specific and refer only to courses leading to undergraduate qualifications, therefore they are not the appropriate location. A more generalised collection of standards are required for non-award enabling courses which fall outside of the existing standards eg. those leading to postgraduate awards.

In light of that, we do not see a reason to adjust the Standards to include short courses of under 26 weeks within the Foundation Program Standards. Although there isn’t currently a set of standards that apply to these courses, they are regulated by the ESOS Act and the National Code. Perhaps, a name could be developed for these kinds of courses and a set of Standards set up to provide additional quality assurance.

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?

Even before the impact of COVID, online learning has become an increasingly important component of modern educational practice. When done well, it can provide students with an engaging and effective learning experience.

It is recommended that the Foundation Program Standards recognise the use of online learning to enhance the student experience with the setting of quality measures that help to ensure positive student outcomes. Firstly, the definition of ‘online learning’ in the National Code does not recognise modern online delivery modes, such as synchronous, asynchronous and blended/hybrid learning, so the definition would need to be adjusted to allow modifications in regard to the Foundation Program Standards to be applied in practice. Standard 8 states that online learning ‘... does not require the overseas student to attend scheduled classes or maintain contact hours’, yet via Zoom and similar platforms synchronous online learning enables this, so aspects such as this would need to be clarified.

It is recommended that limits should specify the allowable level of online learning as a percentage of course units (or equivalent). As for what that limit should be, it is recommended that it is set at no more than the level prescribed in Standard 8 of the National Code that 'A registered provider must not deliver more than one-third of the units (or equivalent) for higher education or VET course by online or distance learning to an overseas student'.

Regarding consideration of younger learners, as mentioned above, this could be addressed by applying an additional Standard on the care and safety of overseas students under 18 that is consistent with that of the ELICOS Standards.

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?

The distinction between streamlined and general programs is important and, as such, required. If the distinction is removed, it could lead providers to discontinue offering studies that have a higher delivery cost, such as those that need specialised and expensive facilities like laboratories and design centres.

Key learning areas should be required, but providers also need the flexibility to develop their curriculum based on sound pedagogy and both student and pathway course needs.