

NEAS AUSTRALIA RESPONSE

National English Language Teaching Accreditation Scheme (NEAS) response to the Consultation Paper *Foundation Program Standards: positioning for quality, success and competitiveness*

NEAS Australia congratulates the Department of Education Skills, and Employment (DESE) on the consultation paper, *Foundation Program Standards: positioning for quality, success and competitiveness* and welcomes the opportunity to provide a response on behalf of NEAS Australia members.

The Consultation Paper is a particularly important document released during the most difficult period that the International Education Industry has ever experienced and provides an overview of the current landscape for Foundation Programs. It recognises the significance of Foundation Programs to Australia's higher education sector and the importance of ensuring the rigour and quality of the Foundation Programs pathway so as to support the engagement of international students in Australian higher education and to improve outcomes for students.

It identifies three main areas of challenge:

- Assuring student preparedness
- Modern delivery methods
- Consistency within the ESOS legislative framework.

Given the current context it is essential to the ongoing success of the Australian international education industry that students are adequately prepared to succeed in a higher education study environment.

Discussion questions

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

NEAS Australia generally supports the proposed amendments.

NEAS Australia represents member providers across the ELICOS sector, from schools to higher education, as well as stand-alone providers of English language tuition. Foundation Programs are offered by a number of NEAS member centres in the higher education sector, as well as by others who do so through arrangements with university partners. Many of our member providers are not members of other peak bodies in Australia, so rely solely on NEAS Australia to represent their

voice and views. We thank the Department of Education, Skills and Employment for their inclusion of NEAS Australia in this consultation.

NEAS Australia has consulted widely for this submission, canvassing expert opinions from our [Board and Staff](#), [Advisory Council](#) and [Quality Assurance Assessors](#).

The *NEAS Quality Assurance Framework* comprises a number of Quality Areas and Quality Principles that apply to all member centres, as well as a number of specialist Areas. Quality Area N of the *NEAS Framework* pertains to Foundation Programs and members offering such programs are required to demonstrate quality provision in accordance with the Quality Principles in this Area. More information on these existing standards can be found here:

<https://neas.org.au/resources/neas-quality-framework/>

Recommendation A:

- Foundation Programs Standards should align as closely as possible with the National Standards and Foundation Programs should primarily be regulated in accordance with the National Standards. Where there are specific exemptions for Foundation Programs, these should be made explicit in the Foundation Programs Standards.
- The Foundation Programs Standards should be brought into line with the ELICOS Standards through:
 - an additional standard relating to the welfare and learning needs of students aged under 18
 - the introduction of a minimum of 20 hours tuition per week
 - requiring inclusion of course objectives and learning outcomes in course applications
 - stipulating an annual program of relevant professional development for staff
 - stipulating maximum class sizes, based on the mode and format of the Foundation Program activity, with English language class sizes consistent the ELICOS Standards, and a larger maximum, for example, for lectures.

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?

NEAS supports reducing the minimum age requirement for Foundation Programs to 16 years old at commencement, with strict new guidelines in the standards enabling the enrolment of a student aged 16. This needs to be supported by standards detailing welfare requirements for such students.

Increased Commonwealth scrutiny of the welfare of young people is reflected in the *National ELICOS Standards (2018)* and the *Commonwealth Child Safe Framework (2019)*. The *NEAS Quality Assurance Framework* includes a comprehensive specialist Quality Area specific to the Welfare of Students Aged Under 18 which was developed to support member centres in ensuring the welfare and wellbeing of younger students throughout their enrolment, from the point of recruitment. NEAS has found this to have been of particular value to members who predominantly enrol adult students and may be less familiar with the needs of minors.

Recommendation B:

Specific standards are needed to ensure the welfare of students aged under 18 and address their learning needs. Such standards should be incorporated into the Foundation Programs Standards and should align with the ELICOS Standards and with the principles of the Commonwealth Child Safe Framework. The main areas for such care are content of lessons, careful oversight of mixing of young students with adults and accommodation.

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

NEAS supports maintaining the option of extended Foundation Programs which meet the same Standards as standard Foundation Programs.

Extended Foundation programs of up to 18 months in duration cater to students who have passed year 11 but do not meet the academic standards and English language requirements for entry into a standard Foundation Program. While students may have the option of packaging ELICOS and a Foundation Program, an extended Foundation Program may be better placed to provide targeted English and specific focus on preparation for academic study.

All Foundation Programs should be regulated to the same Standards. This should include accelerated or express programs which are currently not regulated.

Recommendation C:

The same Standards as apply to standard Foundation Programs should also apply to extended and accelerated or express programs.

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’?

Shorter, preparatory programs may be registered by TEQSA as non-award tertiary preparation courses which are regulated by the ESOS Act and the National Code. There is a role for such shorter non-award courses. However, unless they are also subject to the Foundation Program Standards and the National ELICOS Standards they will not have the level of quality assurance that applies to standard Foundation Programs.

Recommendation D:

All Foundation Programs should be regulated to the same Standards, regardless of length.

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?**

While the National Code allows online delivery of Foundation Program programs only as additional to minimum face-to-face teaching requirements, the need for flexibility in the context of the COVID-19 pandemic has resulted in providers being permitted to deliver Foundation

Programs in mixed-mode and online. Providers have experienced both successes and challenges in delivering Foundation Programs fully or partially online.

There are also students whose study has been interrupted and as a result, have not been able to complete the equivalent of Year 12, as they would have expected. Differences in quality of, and access to, online study may mean that some students have not been prepared for direct entry to university.

Increased integration of technology in classroom teaching and assessment methods mean that students will require access to, and the ability to take advantage of, the technology relevant to the Foundation Program and to their intended course and units of study, as well as to electronic and physical resources. Face-to-face learning remains essential in the delivery of ELICOS and Foundation Programs while the incorporation of online learning also prepares students to engage effectively with online learning in Higher Education courses.

It is important that the Standards define online learning in the context of Foundation Programs (e.g. live online, hybrid, asynchronous models) and that the proportion and quality of online learning be regulated.

The *NEAS Quality Assurance Framework* includes a specialist Quality Area and component Quality Principles specific to Online Delivery, with relevance to but not restricted to English language courses. Its Principles are equally relevant to online delivery of Foundation Programs and can be found here: <https://neas.org.au/resources/neas-quality-framework/#area-h>

Recommendation E:

Online learning should form part of Foundation Programs and the nature and quality of online learning should be addressed in the Foundation Programs Standards. An appropriate proportion of maximum online course hours would be 20%, or a maximum of one hour per day asynchronous online learning in a 20 hour per week course. The other 80% should be synchronous learning but can be delivered using different modes (for example, face to face, on campus, or virtually through Zoom etc) and there should be no restrictions around the number of hours or percentage of this delivery. This is to support students who live in regional areas, have disabilities or specific reasons that prohibit traveling.

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

i. 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 current Standards distinguish between 'generalist' and 'streamed' programs. Generalist programs must include subjects in a broad range of areas and cater to students who may not yet have decided on their higher education program.

Streamed programs can be designed so as to offer subjects relevant to the entry requirements for a specific area of higher education study and to facilitate the provision of specifically targeted English language and academic preparation.

A clear distinction between streamed and generalist programs allows providers flexibility in designing streamed programs and still ensures the integrity of any generalist program.

Recommendation F:

Providers should have complete flexibility to design choices around key learning areas relevant to degrees offered by the provider or its partner institution(s). Foundation Programs must have relevance to target degrees and be managed in conjunction with receiving universities to ensure relevance.

The design of a Foundation Program needs to be transparent and adequately explained to intending students.

7. Additional information

The *NEAS Quality Assurance Framework* includes a broad ranging specialist Quality Area specific to Foundation Programs. Quality Principles in this Area include aspects of course design, delivery, assessment and maintenance as well as student support. The following comments are informed by the NEAS Framework and the experience of member centres offering quality Foundation Programs.

Ensuring appropriate English language requirements

- While IELTS 5.0 is appropriate as an absolute minimum entry level for extended Foundation Programs, entry requirements for individual programs are better related to degree entry requirements so as to align with direct entry courses. Entry levels for Foundation Programs need to reflect the level students need to attain to enter their intended higher education program. An entry level of IELTS 5.5 will be appropriate to some Foundation Programs but too low for others.
- It is important that formal measures are 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.

Ensuring academic preparedness

- Providers who have a relationship with one or more receiving universities should have a formal agreement with each university. The Foundation Program(s) offered by such providers should have clearly identified outcomes which reflect the provider's formal agreement(s) with higher education partner(s) and are developed in consultation with relevant faculties. It is vital so that future students can see that a planned pathway is there, rather than a generic university preparation program.
- Final course assessment should include overall university readiness, with formal measures in place to ensure that assessment outcomes are comparable to other criteria used for admission to the higher education partner(s).
- Course content and delivery strategies should prepare students for academic and professional life, including through development of culturally relevant skills such as critical thinking, academic rigour and integrity, collaborative project work and problem solving.

Program delivery strategies should incorporate a range of technological literacy, information literacy and media literacy.

Quality assurance and student support

- The provider should engage in ongoing quality assurance activities with independent, industry led, quality assurers with expertise in international education and training. Benchmarking activities should be conducted by an independent body.
- Assessment procedures should be consistent with the requirements of the higher education partner(s), with examinations, if used, contributing no more than 40% of overall assessment weighting. Student achievement should be measured through validated assessment instruments mapped to subject learning outcomes and moderated to ensure consistency of assessment judgement.
- Providers should ensure access to digital and physical resources and support services for all students, including online access for students to their progress reports.
- Providers should facilitate meaningful engagement with the receiving institution campus and staff. Students should have access to professional support staff and facilities of higher education partner(s).