



Foundation Program Standards: positioning for quality, success and competitiveness

A discussion paper to support redeveloping and enhancing the Foundation Program Standards for introduction from 1 October 2021.

Foundation Programs for international students are nationally recognised courses that equip these students with the skills and capabilities to seek entry into higher education programs in Australia. They provide an academic entry pathway to first year undergraduate study or its equivalent.

The current Foundation Program Standards (the Standards) were legislated in 2011 and are due to 'sunset' (be automatically repealed) on 1 October 2021. The Standards will need to be re-created, and we are seeking sectoral and providers' perspectives with a view to add possible amendments that enhance quality.

The Standards will be updated in consultation with the sector, so providers can adequately prepare students in English language and academic requirements before their tertiary study.

This paper provides an overview of the current landscape for Foundation Programs and has been developed based on desktop research, preliminary consultations and previous feedback on issues and concerns. The department seeks expertise from industry stakeholders to share insights, challenges and opportunities in the Foundation Program sector and feedback on the areas for revision identified by the department.

Context

Foundation Programs are nationally recognised preparatory courses that provide a curriculum ensuring international students have a strong academic foundation suitable for tertiary study in Australia. The curriculum includes a component of English language preparation, as well as other core skills such as group work and creative, analytical, and critical thinking skills.

Foundation Programs are delivered to student visa holders who have not met the academic entry requirements for their desired undergraduate program. Students can also complete a Foundation Program as an alternative to a year 12 school course.

Foundation Programs and English Language Intensive Courses for Overseas Students (ELICOS) are both pathways to tertiary education and can complement each other. ELICOS can be delivered under a direct entry arrangement with a tertiary education provider, for students who have met the

academic requirements but not the English language requirements for admission to the tertiary course. Foundation Programs have a focus on English language development and academic preparedness.

For English language requirements, the Standards (available at www.dese.gov.au/esos-framework/resources/foundation-program-standards) require a minimum of 200 hours of scheduled course contact hours in formal English language learning and communication skills for students. This must include 100 hours of formal class contact time, as well as regular, supervised self-directed study of English.

The Standards require a course duration of at least 26 teaching weeks, (but no more than 18 months) and must contain a minimum of 720 scheduled course contact hours.

Student cohort analysis

In 2019, there were 18,050 total enrolments in Foundation Programs (Source: PRISMS Data). This is less than 2 per cent of total international student enrolments. The decrease to 13,954 enrolments in 2020 is reflective of the COVID-19 pandemic’s disruption to mid-year enrolments and student uncertainty about border openings. As the intention of Foundation Programs is progression into a higher education course, students enrol in packages of multiple courses, with only 1 per cent of students enrolled in foundation courses in 2020 having this course as their sole enrolment.

The top 5 nationalities contributed over three quarters of total enrolments (77 per cent) in Foundation Programs in 2020. Students from China have steadily been above 60 per cent of enrolments. The decrease in Chinese student enrolments in Foundation Programs in 2019 and 2020 is proportional to the total decrease in enrolment numbers across such programs. Students from India and Nepal make the top 5 of higher education enrolments but have a low uptake of Foundation Programs.

Nationality	Enrolments (2016)	Enrolments (2017)	Enrolments (2018)	Enrolments (2019)	Enrolments (2020)
China	11,184	13,451	13,361	11,770	8,727
Vietnam	571	796	811	866	764
Hong Kong	725	758	686	590	572
Indonesia	550	663	668	642	408
Malaysia	663	646	538	489	340
<i>Other Nationalities</i>	<i>3,092</i>	<i>3,719</i>	<i>3,691</i>	<i>3,693</i>	<i>3,143</i>
Total	16,785	20,033	19,755	18,050	13,954

Foundation Programs include cohorts under 18 years of age who require support and age appropriate teaching methods. The school sector has expressed concern about an increase in the number of onshore school students who transfer from their programs to Foundation Programs. However, departmental data does not support these claims. While some school students may decide a Foundation Program better meets their needs, patterns of student transfers in PRISMS do not show a disproportionate number of students transferring from any particular school to a Foundation Program.

In 2020, 64 per cent of students enrolled in Foundation Programs had Foundation Programs as their first course of study in Australia. 29 per cent were enrolled in ELICOS directly before progressing to a Foundation Program.

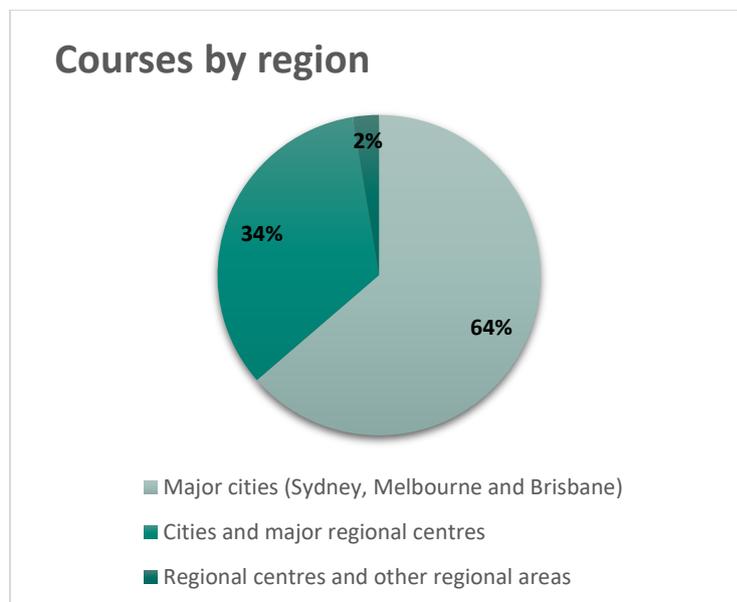
In 2020, 80 per cent of students were under 20 years old at commencement, with 18 per cent of students under 18.

Provider analysis

As at May 2021 there are 32 registered Foundation Program providers delivering 76 Foundation Programs. A list of registered providers and their courses is at [Attachment A](#).

Of the 32 registered Foundation Program providers, 10 are multisector providers, also offering other courses. Some providers deliver Foundation Programs on behalf of multiple universities. Some universities deliver their own Foundation Programs.

As the below graph shows, the majority of Foundation Programs are delivered in major cities, with only 2 per cent of courses in regional centres or other regional areas (Source: PRISMS data, using the Department of Home Affairs designated regional areas definition).



Legislative framework

The *National Standards for Foundation Programs* (Foundation Program Standards) are a legislative instrument, made under subsection 176C (1) of the ESOS Act, which set out the specific requirements for programs of this type. The Foundation Program Standards will be automatically repealed on 1 October 2021, unless action is taken to preserve them.

Assuring quality

Providers must demonstrate compliance to achieve approval, registration and re-registration of a Foundation Program on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). All Foundation Program providers must comply with the requirements of the *Education Services for Overseas Students (ESOS) Act 2000* and related legislative framework.

The Tertiary Education Quality Standards Agency (TEQSA) is the ESOS Agency for all Foundation Programs.

Student outcomes

There has been some criticism in the media of education providers enrolling underprepared international students without adequate checks being in place. An article published in the Australian on 31 October 2020, titled *Uni student programs 'ripe for abuse'* stated “promotional material for pathway programs illustrates students will almost certainly obtain a place at the university after the pathway program” and “with pathway programs run as ‘arm’s length’ commercial ventures with private institutions, they are not subject to the same oversight and reporting as actual university programs, meaning information about the standard of English that foreign students are required to reach is shielded from public scrutiny.”

According to an ICAC University Integrity Survey in 2020 of South Australian universities, fifty-six per cent of academics and managers surveyed cited poor English skills as a critical factor in enrolled international student academic struggles.

TEQSA and providers will be giving further consideration to this area, to ensure admission practices are adequate and are setting students up for success.

While the department considers Foundation Programs a sound pathway for students wishing to enter higher education, the remaking of the Standards is an opportunity to further strengthen the rigor and quality of this pathway to support international students’ positive engagement in Australia’s higher education sector and improve student outcomes.

Take up

Foundation Programs compete for students with other pathways including schools, ELICOS, VET and offshore programs. Similar overseas student cohorts can take university-run one-year diploma programs that allow students to progress directly into the second year of a bachelor’s degree and have lower academic and English entry requirements than degrees. Students requiring English training who have met the university academic entry requirements might enrol in an ELICOS pathway course.

Foundation Programs are unique in that they are designed specifically for, and can only be delivered to, student visa holders, the majority of whom speak English as a second language. Universities benefit from Foundation Programs by gaining access to a cohort that do not otherwise meet their entry requirements and by delivering a course to ensure the students are adequately prepared for a higher education study environment.

Foundation Programs differentiate from other pathways and have unique selling points, in that they:

- accept students who have completed year 11, but not year 12
- combine English language and academic subjects
- have an international student learning environment - classmates have similar backgrounds and understand the unique challenges faced by international students.

There is an opportunity for international education providers who already have structures in place to support international students, such as ELICOS providers, to move into offering Foundation Programs. There is also an opportunity for providers delivering both ELICOS and Foundation Programs to offer packages for students who do not meet the English language requirements for the Foundation Program.

The requirement for providers to have a relationship with one or more universities may make it difficult for new entrants to break into the market. New providers could consider partnering with universities that do not have a Foundation Program.

COVID-19 has created challenges for the Australian international education system and has highlighted the need for product diversification. COVID-19 has affected education delivery in countries differently.

There may be a cohort of students whose study has been interrupted and were not able to complete year 12 equivalent as expected. Differences in quality of, and access to, online study may mean that some students are not prepared to directly enter university.

Challenges

This section outlines the challenges and invites consideration of potential changes to the Standards to address student preparedness, modern delivery methods and consistency with the ESOS legislative framework.

Assuring student preparedness

Providers must ensure students are academically prepared for, and have met the minimum standards to progress to, the undergraduate program. English language admission standards must at a minimum align with the Migration Standards and enable students to achieve success in both the Foundation program and the subsequent higher education course.

Ensuring appropriate English language requirements

Low English levels can affect transition to higher education, and subsequent progression. We seek to explore stakeholder views on the appropriateness of the current English language minimum requirements and if students are sufficiently prepared for university on graduation from a Foundation Program. Dedicated English course hours are intended to improve students' English ability, however, students are not required to take an external English test again, such as IELTS, before beginning their higher education course.

There is an opportunity to consider the merit of 'extended' Foundation Programs versus packaging an ELICOS and a Standard Foundation Program; and whether students' English language proficiency should be re-tested after such pathway courses are completed and before commencement into students' chosen course of study.

There are anecdotal and media claims that some students do not graduate from Foundation Programs with appropriate English language skills to enable them to successfully study in an

undergraduate course. Other media reports have raised the issue of low levels of English language skills in Foundation Programs.¹

There is little evidence Foundation Program providers are admitting students to Foundation Programs who do not meet the English language ability required by the Standards. Standard 2.4 of the Standards sets the minimum English language proficiency level for entry to a standard Foundation Program at **IELTS 5.5** (minimum 5 in all skills) or equivalent and an overall score of **IELTS 5** for extended Foundation Programs.

Extended Foundation programs, which can be up to 18 months in duration, are an option for students who have passed year 11 but do not meet the academic standards and English language requirements for entry into a standard Foundation Program. To date, there has been flexibility to allow admission to extended Foundation Programs with an overall band score of **IELTS 5**, which is below the Migration Regulation requirements of an **overall band score of 5.5** to receive a student visa².

Universities set their own admission requirements for tertiary courses. It is not clear if higher education providers independently assess students' English levels after graduation from Foundation Programs to ensure they have suitable English level for their enrolled course, and if these students have met the same English language proficiency standards applied to direct entry or other pathways.

The 2015 ICAC report on international students at NSW universities showed that although IELTS guidelines set out linguistically demanding academic courses require a band score of between 7.5 and 9, NSW universities (like many universities globally) generally require an average IELTS band score of 6.5 to gain entry into undergraduate and postgraduate courses.³ In Australia, a typical minimum overall IELTS score is set at 6.0 to 6.5 for degrees such as Business or Arts and higher for language intensive courses.

The National Code of Practice for Providers of Training and Education to Overseas Students (the National Code) requires providers to have policies in place to assess whether the overseas student's English Language proficiency is sufficient to enable them to enter the course. This means that both Foundation Program providers and universities must assess the student's English ability before accepting them into their courses.

Of students who were enrolled in Foundation Programs in 2020, 60 per cent took an IELTS test before commencement into the Foundation Program. The following table shows of these students, 47 per cent had a score of 6.0 or above, higher than the current requirement for Foundation Programs and only 16 per cent of students had a score of 5.0 or below (PRISMS Data).

¹ *Foreign students bullying lecturers, the Australian*, 5 August 2020; *Uni student programs 'ripe for abuse', the Australian* 31 October 2020.

² Migration (IMMI 18/015: English Language Tests and Evidence Exemptions for Subclass 500 (Student) Visa) Instrument 2018.

³ *Learning the hard way: managing corruption risks associated with international students at universities in NSW* (2015), NSW Independent Commission Against Corruption.

IELTS scores on commencement of Foundation Program (2020)

IELTS Test Scores	Percentage
Below 5.0	4%
5.0	12%
5.5	37%
6.0	24%
6.5	11%
>6.5	12%

Academic preparedness

Students come from different learning and teaching cultures and can face major hurdles in developing skills in inquiry, critical thinking, academic rigour and integrity. Universities can require a broad range of academic skills depending on the course taken. There is an opportunity to create a strong link between academic preparedness content in Foundation Programs and real academic requirements across university courses. Foundation Program providers are already required to have a written agreement with receiving universities, but this is general in nature. A more specific set of agreed requirements, including curriculum, would ensure adequate preparation for students. Including more specific requirements would ensure consistency across the sector and serve to strengthen collaboration between Foundation Program providers and receiving universities.

TEQSA has advised universities to develop effective systems to track and analyse the performance of identified student cohorts. If this analysis reveals any issues with the students' capacity at entrance, Foundation Program providers and universities could then work together to adjust the curriculum.

Possible amendments

The following amendments are draft, the final proposed amendments will take into consideration the feedback from this consultation paper. We also welcome any additional amendments for consideration.

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."
- Increase the minimum IELTS score for 'extended programs' from 5.0 to 5.5.
- Consider whether the minimum IELTS score for standard programs is appropriate.

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

Modern delivery methods

The Foundation Program Standards, which were made in 2011, need refreshing to ensure curriculum requirements are still fit for purpose and resources reflect contemporary applications of technology.

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 course and units of study, as well as to electronic and physical resources.

Appropriate, modern assessment types need not be limited to exams and the Standards can be modernised to give providers greater flexibility in determining appropriate types of assessment.

The Standards allow Foundation Program providers to offer both 'generalist' and 'streamed' programs, or both. Generalist programs must include subjects in a broad range of areas, including at least one subject in the following areas:

- Mathematics
- Science and Technology
- The Arts
- Society and the Environment/Business and Legal Studies

Streamed programs may offer subjects from these areas, or only subjects relevant to the entry requirements for the proposed area of higher education study.

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

Usually, the National Code only allows delivery of online study for school, ELICOS and Foundation Program programs in addition to the minimum face-to-face teaching requirements. The flexibility shown by the department and TEQSA in response to the COVID-19 pandemic has allowed providers to deliver Foundation Programs online and in mixed delivery modes for the first time. Providers are invited to submit their reflections on the successes and challenges of delivering online in full or in combination with face to face delivery.

Possible amendments

Quality assurance and student support

- Ensure access to digital and physical resources and support services.
- Require student progress reports to be available in an online format.
- Replace references to "exams" with "significant formal assessment".
- Require that exams should not form more than 40% of the overall assessment weighting.
- Consider whether the distinction between streamed and generalist programs is appropriate.

Consistency within the ESOS legislative framework

The Foundation Program Standards should be consistent with the ELICOS Standards and the National Code as they both apply to further education preparatory courses, with similar cohorts of students.

Currently, Foundation Program students must be a minimum of 17 years old at commencement or 16 years of age with prior approval by TEQSA. 18 per cent of the Foundation Program student cohort in 2020 were under 18 at the time of commencement (PRISMS data). Consideration could be given to raising the minimum age to 18, if not, then we should introduce an additional Standard on the care and safety of overseas students under 18, consistent with the ELICOS Standards.

Since the Foundation Programs were legislated in 2011, there has been increased Commonwealth scrutiny to ensure children's and young persons' safety in institutions. The ELICOS Standards were revised in 2018, to include a specific Standard to ensure the safety and welfare of younger students. The Commonwealth Child Safe Framework (the Framework), introduced in 2019, aims to protect children and young people from the risk of harm or abuse. Similar requirements if introduced in the Standards would align with the change in the ELICOS Standards and ensure consistency with the principles of the Child Safety Framework. Stakeholders are invited to consider requirements for younger overseas students that could be implemented by Foundation Program providers and are able to be regulated by TEQSA.

The ELICOS Standards have explicit requirements for implementing an annual program of professional development each year, as opposed to only requiring ongoing professional development under the Foundation Programs. While these requirements will already be standard practice for many Foundation Program providers, specifying training should be on an annual basis would bring the Standards in line with the ELICOS Standards and ensure consistency across providers.

ELICOS programs require a minimum of 20 hours of tuition per week. The Foundation Program Standards require programs to be delivered on a fulltime basis. The Standards detail a minimum of 720 scheduled courses contact hours over not less than 26 weeks and not more than 40 weeks of full-time study, however, there is no explicit requirement setting minimum contact hours per week. Consideration could be given to adding a minimum of 20 hours of tuition per week to the Standards to bring them into alignment with ELICOS requirements.

TEQSA may consider applications for shorter, preparatory programs and register these as non-award tertiary preparation courses. These courses are regulated by the ESOS Act and the National Code but do not have the additional quality assurances applied by the Foundation Program Standards or the ELICOS Standards. While the Standards do not currently apply to these so-called accelerated programs under 26 weeks, there is scope to consider how these programs should interact with the Standards.

Possible amendments

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

- 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.
- Specify Foundation Programs must be a minimum of 20 hours per week.
- Require providers to implement an annual program of professional development for teaching staff which includes teaching students from non-English speaking backgrounds.

Submissions

You are invited to submit a written response to this consultation paper. Please consider the paper and the below questions when formulating your response and provide justifications for any answers. Send us your feedback via the [submission form](#) by 5pm AEST 23 July 2021. You will be required to advise whether you agree to have your submission published online.

Discussion questions

1. What are your overall comments on the paper, including the possible amendments?
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?
3. Is there a need for 'extended' Foundation Programs?
 - i. If so, how should the Standards apply to them?
4. Should the Foundation Program Standards also regulate courses under 26 weeks?
 - i. If not, should providers be able to register these courses on CRICOS as 'non-award'?
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?
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?

Attachment A: 2021 CRICOS registered Foundation Program providers

Organisation Name	Course Name
Canning College	WA Universities' Foundation Program
Central Queensland University	CQUniversity International Foundation Program
Charles Darwin University (CDU)	International Foundation Studies Program
Educational Enterprises Australia Pty Ltd	Standard Foundation Studies Program Extended Foundation Studies Program
International College of Management, Sydney Pty Limited	Australian Foundation Program
International Education Services Ltd	IES Foundation Year (Express Program) IES Foundation Year (Standard Program) IES Foundation Year (Extended Program)
Kaplan Higher Education Pty Ltd	Foundation Studies
Macquarie University (Macquarie)	Standard Foundation Program
Melbourne Institute of Business & Technology Pty Ltd	Foundation Program (Extended) Foundation Program (Standard)
Monash College Pty Ltd	Extended Monash University Foundation Year (MUFY) Monash University Foundation Year (MUFY) (40 weeks) Monash University Foundation Year (MUFY) (52 weeks)
Navitas Bundoora Pty Ltd	Foundation Studies Program
Newcastle International College Pty Ltd	Foundation Program - Standard Foundation Program - Extended Foundation Program - Medicine
Queensland Institute of Business and Technology Pty Ltd	Foundation Program
Queensland University of Technology (QUT)	Extended Foundation Program
Royal Melbourne Institute of Technology	Foundation Studies: General Foundation Studies: Business Foundation Studies: Art, Design and Architecture Foundation Studies: Science, Engineering and Health
Study Group Australia Pty Limited	University of Western Australia Foundation Program (Advanced) University of Western Australia Foundation Program (Extended) University of Western Australia Foundation Program (Standard) Flinders International Study Centre Foundation Program (Standard) Flinders International Study Centre Foundation Program (Extended) Flinders International Study Centre Foundation Program (Extended) ANUC Foundation Studies Standard ANUC Foundation Studies Rapid ANUC Foundation Studies Extended
Swinburne University of Technology	Swinburne Foundation Year (Standard) Swinburne Foundation Year (Extended)
Sydney Institute of Business and Technology Pty Ltd	SIBT Foundation Program - Standard SIBT Foundation Program - Extended SIBT Foundation Program - Standard
The Anglican Schools Commission Incorporated	Western Australian Universities Foundation Program
The Australian Institute of Music Limited	Foundation Program
The University of Adelaide (Adelaide)	Foundation Studies (Standard) (The University of Adelaide College) Foundation Studies (Accelerated) (The University of Adelaide College) Foundation Studies (Music) (The University of Adelaide College)

Attachment A: 2021 CRICOS registered Foundation Program providers

The University of New South Wales (UNSW)	Standard Foundation Program Standard Plus Foundation Program Extended Foundation Program
The University of Queensland (UQ)	Extended Foundation Program Standard Foundation Program Accelerated Foundation Program
The University of Sydney	University of Sydney Foundation Program - Standard Course University of Sydney Foundation Program - Standard Intensive University of Sydney Extended Foundation Program
Trinity College	Trinity College Foundation Studies (Main) Trinity College Foundation Studies (Fast Track) Trinity College Foundation Studies (Extended) Trinity College Foundation Studies (Main Plus) Foundation Program (Comprehensive) Foundation Program (Comprehensive Plus)
University of Canberra	University of Canberra International Foundation Studies
University of Tasmania (UTas)	Foundation Studies Program (Standard) Foundation Studies Program (Fast Track) Foundation Studies Program (Extended)
University of Technology Sydney (UTS)	UTS Foundation Studies (Standard)
University of Wollongong (UoW)	Foundation Studies (2 Sessions) Foundation Studies - Extended
Victoria University	International Foundations at VU International Foundations at VU (Extended)
Western Sydney University	University Foundation Studies Standard - 2 Terms University Foundation Studies Standard - 3 Terms
Western Sydney University International College Pty Ltd	Extended Foundation Studies Program in Business Extended Foundation Studies Program in Health Science/Nursing Extended Foundation Studies Program in Science Standard Foundation Studies Program in Business Standard Foundation Studies Program in Health Science/Nursing Standard Foundation Studies Program in Science