



Australian Government

Department of Education, Science and Training

«Title» «First_Name_» «Surname»
«Position»
«UnitSection»
«DeptOrganisation»
«Address_1»
«Address_2»
«CITY__POSTCODE»

Dear «Title» «Surname»

Thank you for attendance at, and contribution to, the foundation studies programs workshop held last Wednesday 15 September 2004. The workshop particularly benefited from the willingness of all participants to share views and offer constructive solutions, and I appreciate your contributions.

I am pleased to enclose a summary of the workshop proceedings, outlining the objectives, outcomes and agreed action arising from the workshop. Also enclosed are:

Appendix 1: A list of participants.

Appendix 2: A document outlining the agreed core characteristics of foundation studies programs.

Appendix 3: A list of possible options that were tabled at the workshop to achieve consistent registration and accreditation of foundation programs.

Appendix 4: The background *Issues Paper* that was circulated prior to the workshop.

I am now seeking your in principle support for the core characteristics and the proposed 'way forward' outlined in the enclosed documents, and to ask for additional feedback or input from the «DeptOrganisation» on the outcomes in the enclosed documents. I particularly encourage responses to the following questions:

- a. Is there in principle support for a set of core characteristics of foundation programs, as identified in the enclosed documents?
- b. What amendments, if any, should be made to improve these?
- c. Is there in principle support for the proposed action items identified in the enclosed documents?
- d. What amendments, if any, should be made to improve these?

Please provide input and comment by **COB Friday 15 October 2004** to:

Mr Anthony Fee
Australian Education International (AEI)
Location: 454
GPO Box 9880
Canberra ACT 2601
Email: anthony.fee@dest.gov.au
Phone: (02) 6240 55467
Fax: (02) 6123 6153.

I intend to collate the input received and write to participating organisations in late October, outlining the agreements reached at the workshop and asking for involvement in progressing these further, including establishing a working group to direct subsequent initiatives relating to foundation studies programs.

Please feel free to contact Mr Fee with any questions you may have about this process.

Thank you again for your involvement at the workshop. I look forward to continuing to work with you on this important initiative.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Fiona Buffinton', written in a cursive style.

Fiona Buffinton
Chief Executive Officer
Australian Education International (AEI)
23 September 2004

SUMMARY OF WORKSHOP OUTCOMES

Foundation Studies Programs Workshop

15 September 2004, Canberra

Workshop Objectives

To shape an agreed approach to address specific issues relating to foundation programs in Australia, and to agree on a related plan of action. A summary of the issues is in the attached *Issues Paper* and include:

- the diversity of content, duration, nomenclature and quality assurance of foundation programs;
- the impact of recent changes by the Australian Government Department of Immigration and Multicultural and Indigenous Affairs (DIMIA) to the student visa program for some international students; and
- inconsistent registration on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) and Provider Registration and International Student Management System (PRISMS).

Participants - Full list at *Appendix 1*.

Workshop Outcomes

1. It was agreed that there was a need to define foundation programs and identify common 'core characteristics' to better safeguard the quality and consistency of foundation programs.
2. It was agreed that consistent registration and quality assurance of foundation programs was important and that industry and government should work together to achieve this. It was acknowledged that such registration must be underpinned by a common, clearly articulated definition.

Core Characteristics - There was agreement on the definition and identifying characteristics of foundation programs at *Appendix 2*, and that this definition should determine future naming, registration and accreditation of courses.

It was agreed that, while identification of a minimum duration of study was an important core characteristics, more discussion and analysis was required before identifying what this minimum duration should be.

Registration, Accreditation and Quality Assurance - A number of possible mechanisms for quality assurance and registration/accreditation were identified as starting points, each requiring further analysis and description. The ideas documented by participants is summarised at *Appendix 3*.

3. It was agreed that any framework for quality assurance should be supported by, and formalised through, the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA).
4. It was agreed that a working group be established to lead and oversee the progression and formalisation of initiatives arising from the workshop.

Agreed Action

- DEST to circulate the agreed definition and core characteristics of foundation programs to stakeholders. Deadline: Thursday 23 September 2004.
- Participants to consult with their organisations/departments, including CRICOS officers and accreditation agencies, and seek their comments on the workshop outcomes.
- Based on these consultations participants to provide DEST with input to the workshop outcomes, including in principle support for the agreed definition and the process for progressing registration and accreditation issues outlined above. Proposed deadline: 15 October 2004.
- DEST to coordinate the establishment of a working group that represents stakeholder interests to lead and oversee initiatives arising from the workshop. Proposed deadline: Working group participants identified and agreed to by 29 October 2004.
- DEST to provide advice to DIMIA, based on workshop outcomes, on issues relevant to foundation programs as they impact the student visa program. Proposed deadline: November 2004.

Attachments

Appendix 1: List of workshop participants.

Appendix 2: Draft definition and core characteristics of foundation studies programs.

Appendix 3: Overview of discussion - possible mechanisms for accreditation/quality assurance.

LIST OF PARTICIPANTS

Foundation Studies Programs Workshop 15 September 2004, Canberra

Participants

Roger Alexander	Australian Vice Chancellors' Committee (AVCC)
John Anderton	Tuart College, WA
Terese Angelico	Catholic Education Office, Victoria
Sue Blundell	Affiliation of International Education Peak Bodies (AIEPB)
Shirley Bode	Enabling Educators Working Group
Nicole Brigg	Department of Education, Queensland
Fiona Buffinton	Department of Education, Science and Training (DEST)
Penny Charles	Department of Education, Science and Training (DEST)
Sue Chirstophers	Department of Education and Training, Victoria
David Coleman	Department of Education, Science and Training (DEST)
Kevin Cunnington	Department of Immigration and Multicultural and Indigenous Affairs (DIMIA)
David Endean	Holmesglen Institute of TAFE
Seamus Fagan	English Australia
Anthony Fee	Department of Education, Science and Training (DEST)
Barbara Glen-Feltis	Australian Council of Independent Vocational Colleges (ACIVC)
Marie Healy	TAFE Queensland
Arja Keski-Nummi	Department of Immigration and Multicultural and Indigenous Affairs (DIMIA)
Vic Korobacz	Department of Further Education, Employment, Science and Technology, SA
Linda Laker	Department of Education, Science and Training (DEST)
Mark Lucas	Australian Council for Private Education and Training (ACPET)
Kerry Moir	Department of Employment, Education and Training, NT
Marilyn Sleath	Department of Education and Children's Services, SA
Louise Smith	Department of Immigration and Multicultural and Indigenous Affairs (DIMIA)
Sandra Tweedie	Department of Education and Training, NSW
Judy Vincent	Department of Education and Training, NSW
Judy Whiteaker	Department of Economic Development, Tasmania
David Woodhouse	Australian Universities Quality Agency (AUQA)
Sandra Woolacott	Department of Education, Youth and Family Services, ACT
Ngairé Young	Department of Education, WA

Apologies

Margo Couldrey	Australian National Training Authority (ANTA)
Judith Forsyth	Australian Qualifications Framework Advisory Board (AQFAB)
Caroline Miller	Independent Schools Council of Australia (ISCA)

Facilitator

Ros Williams	Rosetta Consulting Pty Ltd
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CORE CHARACTERISTICS OF FOUNDATION STUDIES PROGRAMS

Foundation Studies Programs Workshop

15 September 2004, Canberra

Definition

Foundation studies programs are nationally recognised courses that equip students with the skills and capabilities with which to succeed in the tertiary sector. They provide an academic entry pathway to the first year of tertiary study at undergraduate degree level.

Agreed Core Characteristics of Foundation Studies Programs

Foundation studies programs:

1. Are based on an academic curriculum that prepares students for further study at tertiary level.
2. Contain a number of discrete academically oriented subjects and learning methodologies.
3. Offer a range of pedagogies and learning opportunities that provide for maximum student engagement.
4. Have common entry requirements for students, namely:
 - Australian Year 11 or 'equivalent'; and
 - Functional English language proficiency as determined by multiple contemporary instruments – an International English Language Testing System (IELTS) score of 5.5 (with minimum of 5.0 in each of the macro skills), or 'equivalent'.
5. Must be accredited courses.
6. Must include an academic English subject.
7. Require students to progress through the program based on a graded assessment system.
8. Have a defined minimum duration of study over one year of enrolment, and that if the duration of a course is less than this duration it should not be identified as a foundation studies program*.

***NB:** Any course which provides direct credit in an undergraduate degree should not be titled or registered as a 'foundation program'.*

* Point for Further Discussion

While there is general agreement that a minimum duration of study should be specified, there is yet to be firm agreement on what this minimum period of study should be. Options proposed for further consideration are that foundation studies programs should:

Have a minimum duration of **26** weeks of study over one year of enrolment, and that this include at least 20 hours per week of study (full time).

Have a minimum duration of **36** weeks of study over one year of enrolment, and that this include at least 20 hours per week of study (full time).

OPTIONS TO SUPPORT QUALITY ASSURANCE

Foundation Studies Programs Workshop

15 September 2004, Canberra

Importance of Consistent Registration and Accreditation Processes

It is in the interest of the international education community to have a consistent and transparent process for registering and accrediting foundation studies programs. A common definition, clearly articulated, will facilitate:

- o Registration and accreditation;
- o Monitoring registration; and
- o Resolution of immigration & visa issues.

Potential Registration/Accreditation Issues

Potential registration/accreditation issues/mechanisms to be explored more fully include:

- o Consistent standards for foundation programs for accreditation purposes which are appended to The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (the National Code).
- o Use of State and Territory / higher education provider accreditation.
- o Voluntary sector-derived accreditation; eg. the National ELT Accreditation Scheme (NEAS) model.
- o Adapting current frameworks like the Australian Quality Training Framework (AQTF) to other sectors.
- o Developing national guidelines for curriculum development as a criterion for registration.
- o Australian bodies to accredit foundation programs to International Standard Classification of Education (ISCED) levels - ISCED 4a or 4b; reviewed by ISCED/United Nations Educational, Scientific and Cultural Organization (UNESCO).
- o Matching the level of foundation programs to (but not entered into) the AQF: for example, comparable to Certificate III or IV, or an exit point of FP being pre-tertiary. This would require defining outcomes and demonstrating how this would be achieved.
- o Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA).
- o Longer term – Australian Qualifications Framework (AQF).

Possible Next Steps

A range of possible next steps were identified. These include:

- o Multi-party working group to develop registration and accreditation elements from existing systems (eg. AQTF, the National Code) and some new elements.
- o National agreement on FP registration and accreditation through formal mechanisms like joint State/Territory, Australian Government and provider agreement; MCEETYA, and/or the National Code.

Additional Information

- o Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) - <http://www.mceetya.edu.au/>
- o Australian Qualifications Framework (AQF) - <http://www.aqf.edu.au/>
- o Australian Quality Training Framework (AQTF) - <http://www.anta.gov.au/aqtfWhat.asp>
- o The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (the National Code) - http://www.dest.gov.au/esos/National_Code/contents.htm
- o Australian Vice Chancellor's Committee (AVCC) - <http://www.avcc.edu.au/>
- o International English Language Testing System (IELTS) - <http://www.ielts.org/>
- o NEAS Australia - <http://www.neasaustralia.com/>
- o Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) - <http://cricos.dest.gov.au/asp/CourseSearch.asp>
- o International Standard Classification of Education (I S C E D) - http://www.uis.unesco.org/ev.php?ID=3813_201&ID2=DO_TOPIC

FOUNDATION STUDIES PROGRAMS

Introduction

This *Issues Paper* presents an overview of current thinking in relation to foundation studies programs in Australia. The paper is intended to provide a common starting point for participants attending a *Foundation Programs Workshop* to be held in Canberra on 15 September 2004.

The paper contains three main areas:

- An overview of foundation studies programs, including a brief background and recent changes to the Australian Government student visa program.
- A distillation of a number of interrelated concerns into four key issues that are seen as most pressing.
- A brief discussion of some suggested approaches for progressing the agenda, including a series of key questions which will form the basis of discussions at the workshop.

This paper has been prepared by the Australia Education International (AEI) Group of the Australian Government Department of Education, Science and Training (DEST). It is not intended as a policy document, nor to provide a particular perspective. Rather, it identifies issues and views on foundation studies programs raised by the Australian education community, including DEST's international network.

It is critical that discussions about foundation programs be undertaken with the shared interests of Australia's education community in mind and within the context of:

- ensuring quality education outcomes for all students;
- supporting the growth and diversity of Australia's international education engagement;
- ensuring equity and opportunity for all, including Australia's domestic students;
- ensuring, where appropriate, definitions and procedures are transparent and consistent;
- protecting the integrity of Australian education and training; and
- maintaining integrity in Australia's student visa program.

These outcomes must underpin any resolution to the issues raised in this document.

This paper builds on previous documents and correspondence from a range of interested parties, as well as recent consultations with industry and government bodies. A list of sources is included at the end of this paper.

"A reputation for quality and reliability in delivery both in Australia and overseas is essential to sustain growth in Australian international education."

Engaging the World through Education – Ministerial statement on the internationalisation of Australian education and training, October 2003, p 28. The Hon Dr Brendan Nelson MP, Minister for Education, Science and Training.

1. OVERVIEW OF FOUNDATION PROGRAMS

Background

Historically, foundation studies programs (FPs) were designed to prepare Australian students without a conventional Senior Secondary Certificate of Education award (Year 12) to undertake university studies. They provided students with general academic, subject and study skills to assist with a successful transition into further education.

Since the late 1980s, many Australian universities and non-university providers have offered FPs to international students to provide “faster access and more specific preparation for international students to undergraduate courses”¹. These days the main consumers are international students who undertake FPs for entry into higher education and vocational education and training (VET) programs.

Definition

No widely recognised and agreed definition exists for FPs in Australia, and this is one of the major issues that this paper identifies. It is not the intention to prescribe a definition now; however, for the purpose of this paper FPs are regarded as **programs which assist international students to gain admission to an award program in either the VET or higher education sector.**

FPs for international students share similarities with foundation programs which are offered to domestic students. Like many international FPs, these programs are often known as *enabling*, *access* or *bridging* courses.

Purpose of FPs

There appear to be two main objectives of FP courses:

- *Access* to higher education or VET studies – Those students who do not have the required secondary school certificate or results (comparable to Year 12), and are using the FPs as a pathway to further studies; and
- *Preparation* for higher education or VET studies – Those students who would otherwise have access to a higher education course of their desire, but who seek additional support in specific/defined areas prior to commencing.

Anecdotal evidence suggests that international students normally enrol in FPs in order to *access*, rather than just prepare for, further education because their current educational qualifications do not give them automatic access to the program of their choice. These are often students who would otherwise not be able to continue their education because of their results or through limited opportunities. Overwhelmingly, FP courses are marketed as access, rather than preparation, courses².

Australian Government departments like AusAID provide funding to students to undertake FPs for both access and preparation purposes. In making this decision, AusAid is generally guided by the expert advice from the provider (normally a university) on whether the student requires an FP.

Some educators have also suggested that some students see FPs as an attractive and more expedient pathway to university, as opposed to formal secondary-level education.

¹ O'Halloran (2004)

² Review of marketing literature of FPs providers, including websites, n = 30.

The Effectiveness of FPs

There are mixed reports about the relative performance of FP graduates in their subsequent studies compared with direct entry students. Some FP providers claim that records show that (their) FP programs prepare students well for further studies³. This is supported by research suggesting that university FP students generally perform as well as non-FP entrants during the first year of undergraduate studies, and in some cases outperform direct entry international students and local students⁴.

However, a 1998 study showed that the performance of FP students dropped during the second year of studies so that they were outperformed by other groups, including non-FP international students⁵. The author believes that this may be evidence that FP courses are overly concerned with preparing students for the first year of study by focusing on course content, rather than broader pedagogical skills.

Snapshot of Foundation Programs

Great variety exists in how FP courses are described and registered on the Commonwealth Register of Institutions Courses for Overseas Students (CRICOS), Australia's central registry of all courses offered to overseas students in Australia. This makes it difficult to provide accurate data on courses numbers and student enrolment figures.

It is estimated that up to **321** different FPs are offered throughout Australia by more than 80 providers in all sectors: school, VET, higher education and English Language Intensive Courses for Overseas Students (ELICOS)⁶. The majority of FP providers are universities.

Most, but not all⁷, FPs are registered on CRICOS as 'non-award' courses, either specified as *Foundation Studies* and *Enabling Courses*, or under the non-specific *Non-Award* category.

CRICOS data shows that there were just over 5,000 international student enrolments in *Foundation Studies* and *Enabling Courses* in the first half of 2004, both of which are 'non-award' courses. An additional 10,000 enrolments are in other non-specified *Non-Award - Other* courses⁸, several of which share similarities with FPs.

International Enrolments in Non-Award Courses – 2002 to present

Level Of Study	2004 (to June)	2003	2002
Enabling Course	267	299	248
Foundation Studies	4,924	5,906	5,720
Non-Award (excluding ELICOS)	10,169	15,812	14,374
Total	15,360	22,017	20,342

Source: CRICOS register. Shows total student **enrolments** for the period indicated. This figure may differ slightly from actual student numbers.

³ Discussions with managers of some FP providers.

⁴ Alexander (2003), data from 1997-99 and 2002; and Coleman (1998), data from 1994 and 1995 cohorts.

⁵ Coleman (1998)

⁶ CRICOS data as at 18 August 2004.

⁷ More discussion about how FPs are registered on CRICOS can be found on pp 5-6 of this document.

⁸ Excludes enrolments in courses registered as *Non-Award ELICOS*.

Changes to Australia's Student Visa Program

The Australian Government Department of Immigration and Multicultural and Indigenous Affairs (DIMIA) uses visa regulations as a means of assuring that potential students are bona-fide students and that they have the capability to sustain studies in Australia.

In December 2003, changes were made to the regulations for certain visa categories that have made it possible for students from *Assessment Level 4* (AL4) countries⁹ to obtain higher education visas (Subclass 573) following completion of Year 11 (equivalent) in their country, provided they have completed or are enrolled in an Australian FP of at least one year's duration.

The changes opened the foundation 'pathway' to students from AL4 countries, including China¹⁰, for the first time. For other countries with lower risk ratings, FPs were already recognised for visa purposes as an alternative to Year 12.

The changes also involved defining one year in duration, for visa purposes, as "a course registered on CRICOS for 52 weeks, or where alternative evidence is provided that it is 36 tuition weeks in length."

An overview of the changes is at [Attachment A](#).

Following these changes, a number of education providers and peak bodies expressed concerns about the impact of these changes, which have highlighted the importance of a consistent national approach. In brief:

- Providers of FPs, particularly from the university sector, are concerned that the duration of FPs for visa purposes was defined at 36 weeks. Most university providers structure their programs to align with university calendars, normally involving 26 to 28 weeks duration per year.
- Other FP providers are concerned that the new regulation includes CRICOS *Non Award* FPs but excludes other FPs (e.g. those registered on CRICOS as *Certificate IV* courses) for the purpose of obtaining a higher education visas.
- Some within the school education sector have expressed concern about the potential loss of students from the school sector to FP providers.
- Offshore providers of FPs have expressed concerns about inconsistencies between on-shore and off-shore visa requirements. The new visa requirements apply to on-shore FPs only.

⁹ Each student visa application is assessed according to an assessment level that relate generally to how likely students are to comply with their visa conditions, based on previous students' behaviour. Assessment level 1 represents the lowest assessment level and assessment level 5 the highest.

¹⁰ Chinese students comprise approximately 21% of all international student enrolments, almost 45% of school enrolments and over 19% of higher education enrolments - Year 2004 *Market Indicator Data*, June 2004 (DEST statistics).

2. THE MAIN ISSUES

This section presents an overview of the primary issues that require clarification or action. These are condensed into four categories:

1. The core characteristics of FPs.
2. Accreditation, quality assurance and recognition.
3. Comparisons between FPs, *Senior Secondary Certificate of Education* and *Certificate IV* awards for the purpose of gaining entry to a higher education or VET program.
4. Off-shore and on-shore quality.

KEY ISSUE # 1 – CORE CHARACTERISTICS OF FPs

“The benefits of international education depend on the service it provides to the overseas student, and on public confidence in its integrity and quality. It is recognised that an industry servicing students who travel to Australia to study requires a consistent national approach to the registration of providers permitted to offer these services.”

- *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (The National Code)*, Preamble (A.1.2), Commonwealth of Australia (2001)

Genuine confusion exists among education providers, government bodies and the market about what FPs are. Programs are marketed in inconsistent and often contradictory ways, and great variation exists in the content, duration and registration of FPs. This lack of clarity has led to misunderstandings in the market about the content, purpose outcomes and pathway options offered by an FP course, both domestically and overseas¹¹. For example, the Chinese Government’s Ministry of Education has raised the issue of the different types of FPs in Australia and the difference in the pathways to tertiary studies. AEI China reports that Chinese government authorities have expressed concern about confusion created by the different accrediting processes and variabilities in the educational content and naming of FPs¹².

In particular, significant inconsistency exists in terms of:

1. The way courses are categorised on the CRICOS register;
2. The duration and cost of courses;
3. Entry requirements;
4. The nomenclature used in course titles and course marketing; and
5. Articulation/credit requirements for progressing to further studies.

1. Categorisation - 175 courses are registered on CRICOS by Australian education providers as *Non-Award Foundation Studies* by a total of 43 different providers¹³. An additional 114 courses which are registered as *Non-Award Enabling Courses* appear to share similar characteristics to FPs.

At least another 32 courses, with registered levels ranging from *Senior Secondary Studies* to *Diploma*, contain ‘foundation’ in the title and appear to share at least some similarity with FPs¹⁴.

¹¹ Consultations with stakeholders and information provided by AEI China, AEI Japan and AEI Middle East.

¹² Information provided by AEI China (24 August 2004).

¹³ CRICOS register as at 16 August 2004.

¹⁴ CRICOS register as at 16 August 2004.

Of these 32 courses, approximately 60% are offered by VET sector providers. These courses cover a range of *Australian Qualification Framework* (AQF) nomenclature, including:

- Senior Secondary Studies - e.g. *High School Foundation Studies*, 78 weeks, TAFE International Western Australia;
- Certificate III - e.g. *Certificate III in Foundation Studies*, 22 weeks, Moreton Institute of TAFE;
- Certificate IV - e.g. *Certificate IV in Foundation University Studies*, 52 weeks, South Australian Institute of Business and Technology; and
- Diploma - e.g. *Diploma of Foundation Studies*, 52 weeks, Monash University International.

Numerous programs registered on CRICOS as ‘multi-field’ *Non-award* courses also appear to offer programs with similarities to FPs, including:

- *Accelerated Foundation Studies Program*, 32 weeks, The Flinders University of South Australia;
- *Bridging Course for Overseas Students*, 10 weeks, St Paul’s College; and
- *University Foundation Year*, 26 weeks, Aspect ILA Perth Pty Ltd.

2. *Duration and Cost* - Courses listed on the CRICOS register as *Foundation Studies* range in duration from **5** weeks to **104** weeks (CRICOS only accepts registration of full-time courses). A similar spread exists for other ‘foundation-like’ courses registered on CRICOS. The cost of these courses ranges from \$1,600 to \$25,875.

3. *Entry requirements* – A perception exists that entry requirements for FPs:

- i. vary greatly between provider;
- ii. vary within a single provider; and
- iii. Are generally low.

- i. Variation between providers: While the usual entry requirement for FPs is Australian Year 11 or equivalent, as well as specified English language competency, entry requirements are variable. English language entry requirements vary from IELTS 4.5 to 6.0 or equivalent, and academic levels range from Year 10 to Year 12 (equivalent), depending on the duration and content of the program¹⁵. Some providers require applicants to have achieved certain grades/results in their school studies, although this is often vague (for example “good grades in four subjects”).

It appears that universities generally use their own experience and information provided about international assessments to determine how overseas school-level qualifications compare with Australian awards. The decision by FP providers to recognise programs as ‘equivalent’ to Year 11 is generally based on the recognition of the parent university that completion of the next year of study will satisfy direct entry requirements. AEI’s National Office of Overseas Skills Recognition provides only broad information about the comparability of school-level qualifications, and can only provide limited comment on Year 11 comparability because no award exists with which to compare it.

- ii. Variation within a provider: Some FP providers do not communicate clear entry requirements, and AEI China has received information that some Australian providers have

¹⁵ Information provided on websites of a sample of Australia FPs providers, n=30.

marketed different entry requirements at different local education exhibitions. It is suggested that entry requirements may change without notice.

- iii. Low entry requirements: A perception exists in some markets that students gaining access to FPs would not otherwise gain access to higher education or Year 12 studies. For example, some Australian FP providers accept Hong Kong students with 6 'E' results in their Hong Kong Certificate of Education Examination (HKCEE). By way of comparison, students in Hong Kong are required to achieve a minimum of 14 marks (at least 3Cs, 2Ds, 1E) in 6 subjects of the HKCEE exam to get entry into Form 6¹⁶.

4. *Nomenclature* - A range of course titles is used to describe and market FP courses (see sample below). Many providers also offer *fast track*, *accelerated*, or *extended* programs in addition to their standard FPs. There appears to be little conformity in how terms are used; for example, *accelerated* courses range from 17 to 40 weeks.

Sample of Course Titles of Foundation Studies Programs – CRICOS Register

CRICOS Course Title	Registered Provider
UniGateway - English Plus	James Cook University
Unistart Program	University of Western Sydney
Bachelor Preliminary Program	The University of Notre Dame Australia
Undergraduate Qualifying Program (Non Award)	The University of Sydney
UNIPREP (Academic)	University of Southern Queensland
Foundation Year Certificate (Express)	The University of New South Wales
Mates Bridging Course	The University of Adelaide
Sub-Tertiary Preparatory Program	Griffith University

While FPs are marketed primarily toward providing *access* for students to university, some are marketed as equivalent to a university 'freshman' year¹⁷.

5. *Articulation and Credit Requirements* - The major 'outcome' of most FPs is admission to the first year of a university's undergraduate program, or to a VET sector *Diploma* program. Most providers promote "guaranteed entry" to further programs provided exit results are satisfactory. Exit requirements and assessment and moderation methods vary among providers, and some concerns have been expressed about consistency in the quality of experience and outcomes that students receive¹⁸.

Some FPs provide access to *Diploma* courses that articulate with credit to the second year of an undergraduate degree. In some instances, the pathways/linkages and credit arrangements are clearly indicated; however, others are less clear.

¹⁶ Information provided by AEI China, 24 August 2004. Form 6 is a two-year program following 11 years of schooling, and leads to the Hong Kong Advanced Level Examination.

¹⁷ "(The FP course) is structured as a university "Year 0"" – promotional brochure of one NSW FPs provider, 2004.

¹⁸ FP results at some FP providers are overseen by an academic committee consisting of university representatives, but this is not always the case.

KEY ISSUE # 2 – ACCREDITATION, QUALITY ASSURANCE AND RECOGNITION

“A quality reputation for Australia’s international education services underpins the long-term benefits for trade and foreign relations and is imperative to domestic acceptance of growth in education services trade. All of this can be jeopardised by education and training providers who do not deliver a quality service, or international students who breach the conditions of their student visas.”

Engaging the World through Education – Ministerial statement on the internationalisation of Australian education and training, October 2003, p 29. The Hon Dr Brendan Nelson MP, Minister for Education, Science and Training.

The diversity of programs to choose from and the flexible nature of many FPs is a major attraction for some students, and a significant selling point for providers. By offering variation in, for example, content, duration and admission requirements, providers can tailor courses to meet the needs of their students and to match the institutions to which the students will progress. However, such diversity makes implementing meaningful and transparent quality assurance difficult.

This balancing of (market driven) flexibility and (quality assurance driven) conformity is complicated by some features unique to FPs:

- FPs are offered across four sectors: schools, VET, ELICOS and higher education providers all offer FPs. Each of these sectors has differing accreditation frameworks and bodies¹⁹; and
- FPs are generally non-award programs, designed as pathways and not stand alone awards, and therefore no AQF award exists for FPs courses. It is difficult to define outcomes of FPs in the same way that other award courses are and attempts to make FPs conform to a single descriptor would reduce the flexibility they offer.

Because of the current accrediting arrangements, providers of FP courses without the capacity to self-accredit are required to register their courses as ‘award’ courses. These are normally registered as AQF *Certificate III* or *IV* courses. Providers talk of this as having to ‘force fit’ their program to an AQF award for the purpose of accreditation. AQF *Certificate III* or *IV* outcomes descriptors are referenced on workplace performance competency and do not make accommodation for the general education outcomes of an FP.

The current lack of consistent quality assurance and accreditation has led, rightly or wrongly, to a perception that FPs lack the checks and balances of more regulated courses. For example, in June this year the Bruneian Government singled out foundation programs as courses that they would not recognise. The variable duration of courses, their existence outside standard qualifications frameworks, and the variability of quality were given as reasons (see the DEST *Market Information Package* article of August 2004, at [Attachment B](#)). The Chinese Government has also expressed concerns about the differing accrediting processes of FPs²⁰.

¹⁹ The AQF website lists government and non-government accrediting bodies for AQF award providers at <http://www.aqf.edu.au/register.htm> ELICOS providers are accredited through the NEAS accreditation scheme. See <http://www.neasaustralia.com/> for more information. Universities are self accrediting.

²⁰ Information from AEI China, 23 August 2004.

KEY ISSUE # 3 – COMPARISONS BETWEEN FPs AND YEAR 12

The December 2003 changes to Australia's student visa program were designed to acknowledge FPs as an alternative pathway to higher or VET education. Some stakeholders have argued that this implies 'equivalence' or comparability between FPs and Year 12 awards, while excluding *Certificate IV* courses. As mentioned previously, many courses with names, objectives and content similar to FPs are registered as AQF *Certificate III* or *IV* courses.

While FPs may be seen to offer some similar outcomes to both Year 12 and some *Certificate IV* courses, the following table, which identifies some features of the three products, suggests that the three are distinct products offering a different package of benefits.

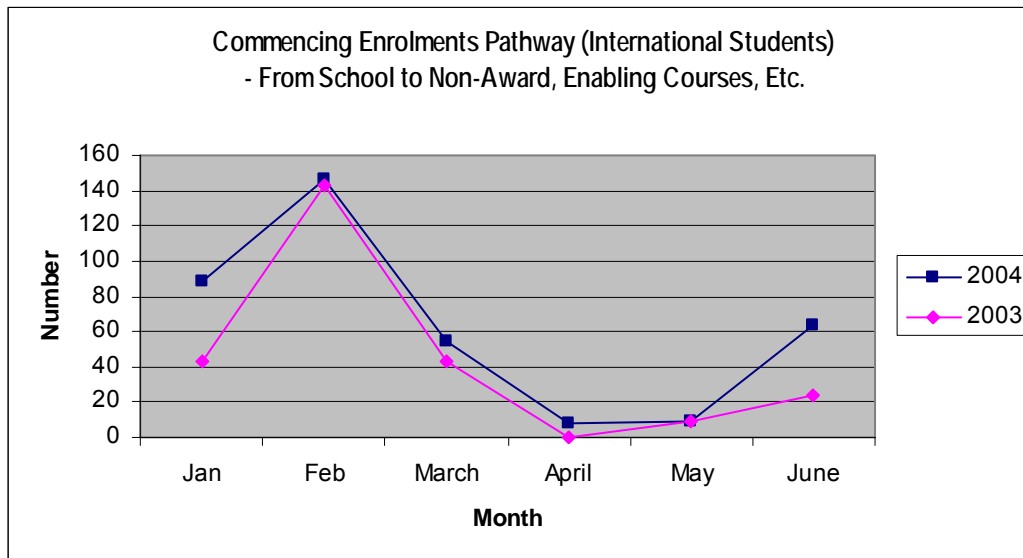
Similarities and Differences – Year 12, FPs and Certificate IV

	Senior Secondary Certificate of Education	Certificate IV (Foundation Studies)	Foundation Studies
Articulates to higher or further education.	YES	YES	YES
Results in an AQF award.	YES	YES	NO
Contains content that is customised to students' specific needs.	NO	YES	YES
Provides flexibility in pathway selection upon completion.	YES	To some extent	NO
Can provide guaranteed entry to higher education or VET programs of choice (provided satisfactory results).	To some extent	YES	YES

Since December 2003 students from *AL4* counties have been able to meet the requirements for a higher education visa by completing an on-shore FP, rather than Year 12 studies. Some educators have proposed that the transfer of students between sectors follow certain procedures that include, for example, approval by the current provider, and are concerned about:

- i. Loss of market share by international students being 'poached' by FP providers, possibly without fully considering, or being aware of, the different outcomes and objectives; and
 - ii. Inadequate levels of pastoral care for students undertaking FPs.
- i. *Market Share*: CRICOS data on the patterns of 'movement' of international students from the *School* sector to *Non-Award, Enabling Courses etc* do not indicate significant changes to student enrolments for the six months immediately following the visa regulation changes and for the same period a year earlier (see chart on the following page). As a proportion of overall student enrolments, the number of students transferring from the *School* sector to *Non-Award, Enabling Courses etc.* is almost identical for both years (0.03%).

However, the data is interim only. The figures for June 2004 are more than double those for June 2003, and it is possible that any impact of the visa regulation changes will only be visible in the latter half of 2004 and early 2005. Additionally, for China, most visa applications for study commencing in the first half of 2004 were lodged before the changes (i.e. before the December 2003 changes).



Source: AEI Market Indicator data – Jan to June 2003 and 2004, derived from CRICOS registrations.

- ii. *Pastoral Care:* All registered CRICOS providers are required by the *National Code* to provide duty of care for students. However, some stakeholder groups have expressed concerns about the capacity of some FP providers to support the pastoral care needs of international students, especially those under 18 years of age.

AEI China reports increased concern from Chinese parents about the pastoral care for Chinese students overseas, noting that the Chinese media are covering ‘negative’ stories about Chinese students under 18 years of age studying abroad in certain countries, but not as yet including Australia. AEI China advises that any major ‘negative’ pastoral care incidents that occur to Chinese students whilst enrolled in FPs in Australia will have a major impact on Chinese perceptions.

KEY ISSUE # 4 – OFF-SHORE AND ON-SHORE QUALITY

“Perceptions of the quality of education and training programs in overseas settings and online impact on perceptions of the quality of Australia’s education and training services generally. Poor quality service delivery anywhere can damage Australia’s reputation. For Australia to sustain competitiveness, quality assurance and consumer satisfaction are essential.”

Engaging the World through Education – Ministerial statement on the internationalisation of Australian education and training, October 2003, p 31. The Hon Dr Brendan Nelson MP, Minister for Education, Science and Training.

An increasing number of Australian institutions are offering off-shore education programs. A recent report by the *The Institute for Research into International Competitiveness*, Curtin Business School²¹, Curtin University of Technology, noted that “[in] 2002, offshore higher education accounted for 52,835 students, or around a third of the entire enrolment of international students in higher education. By 2005, it is forecast that the number of students at offshore campuses will increase to 64,703, an annual growth rate of over 6.7 per cent”.

The exact number of Australian providers offering off-shore FPs is not known. However, several have established off-shore FPs under a range of titles. A number of Australian providers have also partnered with other providers to offer FPs off-shore.

AEI China reports that the Chinese Government has begun encouraging providers to offer FPs within China as a way to overcome pastoral care or other concerns about their students studying abroad.

Some educators have expressed concerns about the quality of off-shore FPs, and their capacity to provide students with the full range of benefits that onshore FP students receive. Extending the *ESOS Act* to cover programs offered off-shore has been deemed unfeasible because of limitations of regulatory provisions and enforcement, and at present distinguishing quality off-shore Australian education providers from others is problematic. Most stakeholders have indicated that they recognise that off-shore quality assurance is important and must be supported.

At present, the changes to the student visa program in December 2003 excluded FPs undertaken off-shore. However, students undertaking off-shore FPs will expect, with some justification, that their programs lead to the same academic and student visa outcomes as their counterparts in Australia.

²¹ *The Economic Benefits to Australia from International Education (Final Report)* - Peter Kenyon and Paul Koshy, The Institute for Research into International Competitiveness, Curtin Business School, Curtin University of Technology (2004), Commonwealth of Australia.

3. THE WAY FORWARD

This section presents a brief discussion of some suggested approaches for addressing issues raised in this document. These are presented in four broad categories:

- a. The need for agreement on core characteristics of FPs.
- b. The need for consistent registration on the CRICOS register.
- c. The need for an accreditation and/or quality assurance framework.
- d. The need to maintain the integrity and equity of Australia's student visa program.

A series of key questions for stakeholders is presented at the end of each section. These questions are intended to guide the substance of discussion at the meeting on 15 September 2004.

a. The need for agreement on core characteristics of FPs

Most stakeholders acknowledge that agreement about the core characteristics of FPs would benefit Australia's educational community, students and prospective students. Consistent educational requirements and learning outcomes, as well as consistent usage of the term 'foundation studies' would make quality assurance and relevant legislation, including the student visa program, easier to monitor and enforce. It would also clarify misunderstanding in the market and may contribute towards promoting the 'recognition' of FPs.

Similarities in FPs

Although the nature of FPs varies greatly, there are significant commonalities. Generally FPs²²:

- i. are designed with the needs of international students in mind (language, cultural and social support, pastoral care);
- ii. provide flexible entry points, choice of content streams of study, and often have a variety of program lengths to suit students' needs;
- iii. emphasise pedagogical approaches and an approach to learning that reflect practices of the institution to which the student will articulate (e.g. university-style lectures and tutorials); and
- iv. require Australian Year 11 or equivalent, often with specified grades, and evidence of English language capability, as entry requirements.

Some FPs also have structured linkage with higher education or VET providers through, for example, curriculum design, subject content, and access to faculty and facilities. Importantly, most FPs emphasise opportunities for students to socially and culturally integrate into the life of the institution. This has been identified as a significant predictor of 'academic adjustment'²³.

A working party comprising representatives from a number of organisations under the banner of the *Affiliation of International Education Peak Bodies* (AIEPB), has proposed a definition for FPs that emphasises that the "key criterion should be that it is a pathway or enabling course whose main function is to provide a pathway to higher education or vocational education and training, whether or not it is recognised by the granting of a certificate or other award." The group also makes a recommendation about the duration of an FP for the purposes of awarding a student visa (see Attachment C).

²² Based on information provided by FP providers, including marketing and Internet; n = 30. Also see Alexander (2003).

²³ Chapman et al (1998), as cited in Coleman (1998).

More than 90% of registered *Foundations Studies* courses are 22 weeks or longer, with an average duration of 41 weeks. Sixty one percent (61%) are registered as being 36 weeks in duration or longer.

Courses Registered on CRICOS as *Foundation Studies* courses – Duration

AVERAGE	41 weeks
MODE	52 weeks
MEDIAN	40 weeks

Similar averages are reflected in those courses registered on CRICOS as *Enabling* or *Certificate* level programs that share similarities with FPs.

As duration of study is currently a determinant for visa purposes, a means of consistently and clearly identifying the duration of an FP would make managing Australia's student visa program much easier.

Key Questions

- What are the core characteristics that 'define' an FP course?
- How can these be communicated to assist the relevant stakeholders?
- How can the duration of study of an FP be consistently and clearly identified?

b. The need for consistent registration on the CRICOS register

The CRICOS register lists all education providers that are registered to offer courses to people studying in Australia on student visas, and the courses offered. All providers on CRICOS are required to comply with the requirements of the *ESOS Act 2000* and the *National Code*.

The existence of such a register, linked to a legislative framework, provides Australian education with a competitive advantage in the market of overseas students by significantly contributing to the integrity of the industry. This is only possible if the integrity of the register is maintained, especially given that DIMIA relies on CRICOS registration to make decisions relating to student visas.

The relevant State/Territory accrediting authority is responsible for checking and uploading course details on CRICOS. DEST administers CRICOS but relies on the State/Territory accrediting authorities to provide the primary controls over the quality of courses entered on CRICOS.

Key Question

- What common criteria underpin registration of FP courses on CRICOS, and how can we ensure this is done accurately?

c. The need for an accreditation framework and/or quality assurance parameters

There seems to be general agreement from all stakeholders that an effective accreditation framework and/or quality assurance parameters for FP providers and/or courses is in the interests of bona fide providers, students and Government bodies. Whether this involves (better) use of existing mechanism/s or creating new ones, the challenge exists to identify quality assurance measures that:

- Are transparent and ‘enforceable’;
- Promote the quality of Australian FP courses and providers;
- Reduce the possibility of abuse of Australia’s student visa program;
- Adequately incorporate both on-shore and off-shore FPs; and
- Enable FP providers to maintain the flexible qualities that students seek.

Key Questions

- What quality assurance parameters will ensure the preservation of quality in the delivery of FPs, both on-shore and off-shore?
- How can these be identified and implemented?

d. The need to maintain the integrity and equity of Australia’s student visa program

Many of the broader issues raised in this document about the definition, quality assurance and registration of FPs have been highlighted as a consequence of the changes to the student visa program that were implemented in December 2003. Agreement and decisions on each of these issues will support continuing improvements to the visa program.

However, it is in the interests of all parties to ensure that resolution of these issues aligns closely with the need to maximise positive outcomes for Australia’s student visa program. This is particularly pertinent in relation to students completing off-shore FPs. It is also relevant to whether *Certificate IV* courses are suitable pathways to higher education visas, noting that:

- *Certificate IV* courses cover a range of subject areas, from aromatherapy to Wing Chun instruction. There is currently no reliable way to distinguish *Certificate IV* foundation studies courses from other *Certificate IV* courses on CRICOS; and
- Visa obligations differ across categories. For example, students undertaking a course at *Certificate IV* level are currently exempt from having to sit an English proficiency test when applying for a further student visa in Australia, while FP students are not.

Key Question

- In addressing the issues in this paper, how can we maintain the integrity and equity of Australia’s student visa program in both the short- and long-term?

4. SOURCES

- **AEI Online Market Information Package** - <http://aei.dest.gov.au>
- **Alexander, R** (2003) Foundation programs as a Preparation for University Study – The UNSW Experience, Paper presented at the 17th IDP Australian International Education Conference, 21-24 October 2003, Melbourne.
- **Brigg, N** (2004) Discussion paper on Foundation Programs – Prepared by the Queensland Office of International, Non-State and Higher Education, Department of Education and the Arts.
- **Coleman, D.** (1998) “*The foundations of higher education: Do students make the grade?*” In Outcomes of International Education: Research Findings. D. Davis and A. Olsen (Eds.) IDP Education Australia. p. 19-34.
- **Kenyon, P and Koshy, P** (2004) The Economic Benefits to Australia from International Education (Final Report), Commonwealth of Australia.
- **O’Halloran, P** (2004) University Foundation Courses – Guidelines and Accreditation Issues: Discussion paper Version 4, Wollongong University College.

ATTACHMENT A

CHANGES TO AUSTRALIA'S STUDENT VISA PROGRAM – DEC 2003

Background

Each student visa application is assessed according to an assessment level (AL). The AL is determined by the passport held and visa subclass.

Visa Categories: DIMIA relies on CRICOS to identify for visa purposes the type of course an overseas student intends to undertake. The CRICOS course level of a visa applicant's principal course of study determines which student visa subclass they will be assessed against. While foundation programs are typically registered as either non-award or in the VET sector (e.g. *Certificate IV* qualification), they do not generally constitute a visa applicant's principal course of study.

Amendments to the visa regulations on 1 December 2003 opened the foundation pathway as an alternative to Year 12 for AL4 applicants. For AL4, this pathway is limited to visa applications assessed against the Higher Education Sector visa requirements (subclass 573). As such, AL4 students who have not successfully completed Year 12 are therefore required to have an offer for bachelor-level studies in order to pursue the foundation pathway to university.

Changes from 1 December 2003

Previous	New	Comments
AL4 applicants for a Higher Education visa must have completed Year 12 (or equivalent).	An applicant may meet requirements if s/he has completed Year 11 (or equivalent) and is enrolled in a preliminary FP of at least one year in duration, or has successfully completed in Australia a FP of at least 1 year's duration.	For this regulation, one year in duration is defined as in <i>The National Code</i> as "a course registered on CRICOS for 52 weeks, or where alternative evidence is provided that it is 36 tuition weeks in length." Only relevant for FPs undertaken or completed in Australia.
AL4 students cannot currently undertake a Certificate IV course as a principal course of study.	Amend AL 4 requirements for VET visas to include within the definition of "vocational education and training course" a course leading to the award of a <i>Certificate IV</i> , where that course is at least one year in duration.	This change recognised claims by Industry that Certificate IV courses were highly valued. See above for definition of a one year course.
The name of subclass 575 was "Non-Award Foundation/Other sector".	The name of subclass 575 is "Non-award sector".	The title was changed because it was deemed to be confusing, suggesting that an FP may be a principal course. As FPs are <i>enabling</i> course only, students should only be granted visas against this in limited circumstances. Non-award Foundation courses will continue to be gazetted against this subclass for those for those limited situations where it is appropriate to consider an FP as a visa applicant's principal course of study in Australia.

Source: DIMIA website (29 March 2004) : http://www.immi.gov.au/legislation/amendments/lc01122003_3.htm

Market Information Article – AEI Online

Brunei Government Publicly Warns About Lack of Recognition for Foundation Courses

In a statement at the launch of an induction course for new teachers on Wednesday 30 June, the Minister for Education in Brunei Darussalam, Pehin Dato Haji Abdul Aziz, urged all parents to seek the Bruneian Government's view on the qualifications that their children are seeking in foreign institutions.

The Minister singled out as an example of courses that will not be recognised by the Bruneian Government as foundation courses. In singling out these courses, he focussed on the length of time required to study as being highly variable (3 months to 12 months), their existence outside standard qualifications frameworks, the fact that they are only for foreign students, a perceived variability of quality and a comparison of foundation courses versus the GCE 'A' levels.

In discussions that AEI has had with the Bruneian Government earlier this year, the Bruneian Government has said that non-recognition of a foundation course can mean non-recognition of the undergraduate degree achieved for that person, while a person who completed their 'A' levels or foreign equivalent, in the same degree at the same institution can have their degree recognised.

The comments are not necessarily targeted at Australia, applying to all foreign universities.

Friday, 13 August 2004

Recommendations of representatives of AIEPB

Extract of letter to DIMIA dated 3 February 2004, following the changes to Australia's student visa program. Included here with the permission of the AIEPB.

2. Definition of one year Foundation Course

The Working Party considers that the interpretation of a one year Foundation course as 52 weeks on CRICOS, with a minimum 36 weeks study is too restrictive and excludes many of the leading and academically successful courses. Unless the definition is changed, a number of courses offered by universities or institutions associated with universities, as well as respected VET providers will be excluded.

Recommendation

That a policy guideline be developed that allows a pathway or enabling course to Higher Education (or Vocational Education and Training) such as Foundation Studies and the Tertiary Preparation Course to be regarded as being *of one academic year duration* if it:

- is of at least 52 weeks duration on CRICOS, and contains 36 weeks of study²⁴ and 20 contact hours per week; *or*
- contains not less than 720 hours of structured learning²⁵, presented over not fewer than 26 weeks of study; *or*
- is of not fewer than 26 weeks of study, and is approved by the appropriate accrediting authority as satisfying the requirements for full-time study²⁶.

3. Definition of one year Certificate IV course

In the changes introduced on 1 December 2003, a Certificate IV may be taken as the principal course in subclass 572 (VET) provided it is *at least one year in duration*. For consistency with Foundation Studies, a one year course should be interpreted using the same criteria.

Recommendation

That a policy guideline be developed that allows a vocational Certificate IV course that is the principal course in a Visa subclass 572 to be regarded as being *of one academic year duration* if it meets the criteria in (the) Recommendation (above).

²⁴ Weeks of study includes formal orientation, class contact, formal study periods when teaching staff are scheduled for consultation, and formal examination periods, but excludes recess and vacation periods when students and staff are usually absent from the campus.

²⁵ Structured learning includes all formal classes, laboratory and self-access, and study/research periods that are scheduled and supervised, in weeks of normal classes and also periods of formal orientation and study/examinations, which are deemed to be equivalent. For example, in a program with one week of enrolment and formal orientation, 12 weeks of 24 hours pw of structured learning, and 2 weeks of study/ examination, the number of hours would be deemed to be $(1 + 12 + 2) * 24 = 360$.

²⁶ In accordance with the *National Code* 13.1