

AQF Review Submission
International Education Association of Australia (IEAA) and English Australia (EA)

Dear Professor Noonan,

Following our conversation at the Council for International Education meeting in Canberra on 14th March, IEAA and EA have set out a specific area of course delivery in Australia that we believe requires some guidance from your current Review.

The *Review of the Australian Qualifications Framework Discussion Paper* (December 2018), raises important considerations around the evolution and use of the AQF and areas for possible change.

Clarifying the definition of Foundation courses

Our first request is to clarify the types of Foundation courses or Programs that are being referenced in this process. The Review's Discussion Paper and Supplementary Paper appear to define these courses differently, definitions that also vary from the ESOS Act 2000.

The Discussion Paper, section 4.1 notes '*a second group of shorter form credentials prepare people for entry to AQF qualifications, sometimes with credit*', and refers to enabling and foundation courses. These foundation courses are referred to as those "that are focused on university admission or the provision of core skills such as numeracy and literacy" (p14). Throughout the Paper, the primary reference to these courses is on skills development.

However, the Supplementary Paper: *Incorporating shorter form credentials into the AQF*, specifically the section 'Enabling courses, Foundation courses' (p.4), groups a range of courses and programs, including Foundation Programs, together. Footnote 16 of the paper (16 Habel, C. Et al., *Exploring the Experience of Low-SES Students via Enabling Pathways*, 2016 , p.5) says these courses are not for international students, as referenced in the excerpt: *For decades in Australian Higher Education, one of the main alternative pathways for non- traditional students (broadly conceived) has been Enabling Programs. Very distinct from entry programs for International Students (which often focus on language development and national/cultural adaptation), these programs are for domestic students who, for a variety of reasons, do not meet the requirements for traditional mainstream entry to university (p.5).*

'Foundation programs' have a distinct place within the Education Services Overseas Students (ESOS) Act 2000. These programs are specifically defined within the National Standards for Foundation Programs as:

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.

Considering Foundation Programs as award or non-award courses

It is difficult for IEAA and EA to recommend to your Review whether Foundation Programs should be considered as Award or non-Award courses.

The current National Standards for Foundation Studies are now very much out of date. After extensive stakeholder engagement, DET has already implemented a new National Code and new ELICOS Standards. The "missing link" is an update to the Foundation Standards. We believe that a review of the current standards should be a priority but note that this is outside the terms of reference of the AQF Review panel. A review could serve the sector and resolve alignment questions that the panel (and sector) may have.

EA and IEAA recently undertook a joint member survey focused on Foundation Programs. The results from the 43 question survey highlighted there was a range of views on the areas for consideration under a potential review of the National Foundation Programs Standards.

On questions such as “should Foundation Studies be an award course on the AQF and a standardised award or qualification be provided to students?” respondents had mixed views.

Some noted the ability to tailor programs to align with higher education courses as a major strength of the current system. While others saw benefit in the potential transportability of qualifications listed on the AQF. Several other questions on minimum English language requirements were raised given Foundation programs focus heavily on this very skill. With no uniform opinion on this key teaching and learning area, conducting a Standards review would allow the industry to reach a consensus on answering this important question.

The Discussion Paper references current constraints and potential opportunities on aligning the Australian Senior Secondary Certificates of Education (SSCE). The conundrum of the SSCE being assigned (or not) to the AQF or potentially being assigned to several AQF levels equally exists with Foundation Programs registered on CRICOS for international students. This is particularly relevant given Standard 1 of the National Standards for Foundation Programs requires that ‘the curriculum must include subjects comparable in standard to an Australian Year 12 curriculum’ (1.2) and ‘the contents of the curriculum must be open to independent scrutiny by designated authorities with relevant expertise, with sufficient detail supplied to allow evaluation of the equivalence of the course outcomes to those of an Australian Year 12 curriculum’ (1.3).

For the above reasons, we believe the Review should clarify if it is focused on Foundation courses that serve an important pathway for domestic students, or if it includes Foundation Programs that are defined under the National Standards Foundation Program. Subsequent discussions congruent with the treatment of SSCE would be pertinent.

We look forward to any clarification and advice you might be able to provide.

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