

25 August 2023

Mary O’Kane and the Australian Universities Accord Panel  
Chair, Australian Universities Accord  
Higher Education Division Australian Government  
Department of Education

### **Introduction**

The National Association of Enabling Educators Australia (NAEEA) thanks Minister Clare, Professor Mary O’Kane AC and the Accord panel for their work to date in developing the Australian Universities Accord. NAEEA welcomes the release of the interim report and appreciates the opportunity to provide feedback to inform the next stage of the process. NAEEA offers a general response to the report, with recommendations that relate specifically to Enabling Education as an effective means of contributing to the realisation of the future 55% attainment target for participation in Higher Education in Australia.

There is much to welcome in the report, including the five immediate action items already being implemented. The interim report clearly articulates the importance of the tertiary education system in building a stronger Australia. It makes clear the Government’s commitment to providing the opportunity for all Australians to attend university, regardless of their location and background. Pleasingly, the report articulates the essential contribution of Enabling programs to providing students from backgrounds of educational disadvantage with the skills and knowledge needed to ensure Australia’s future economic prosperity and social responsibility. Australia’s future depends on an inclusive and strong university system. Enabling programs can not only contribute to an increased level of enrolment in Higher Education courses, but they can also deliver well-prepared students who have every chance of successful completion.

NAEEA applauds the prompt action in implementing the priority actions within the report, in particular, addressing the 50 per cent pass rule under the Job-ready Graduates package which was having such a detrimental effect on those most vulnerable students studying via Enabling programs nation-wide. The removal of this requirement via legislation once again opens the door to opportunity and to a fulfilling career for students assessing their suitability for tertiary study through Enabling program study. NAEEA views the two-year extension of the Higher Education Continuity Guarantee as a vital step toward providing the funding certainty that Australian institutions need to achieve their mission. We applaud the expectation that any funding resulting from this guarantee be used to support greater equity outcomes such as: increased support for students in Enabling programs; improved academic advice and learning support; wraparound support and services; and scholarships or other equity-related services. NAEEA welcomes the government’s move to improve access to university through the creation of more study hubs across the nation.

The association also supports the government’s intention to explore new funding models that are fairer for students and provide the resources universities require to educate the next generation of learners. The report recognises the call by universities for uncapped places for all Indigenous

students regardless of their location. To boost participation in future years, NAEAA recommends uncapped places be extended to include all Enabling students, a growing proportion of whom are of First Nations background. The majority of Enabling students have experienced complex forms of educational disadvantage which have impacted their engagement and achievement and, over time, compounded due to limiting social norms and resourcing issues within many communities. Uncapped places for Enabling programs would contribute significantly to closing the attainment gap and addressing decades of disadvantage experienced by educationally disadvantaged students within Australia.

**NAEEA make the following recommendations in relation to Enabling Programs:**

***Recommendation 1***

Retain Enabling Programs as free of tuition fees and update funding to be consistent with the costs of delivery as for other high-quality higher education programs. Enabling programs should be adequately funded, with the Enabling loading component, allocated in lieu of a student contribution, changed to be provided at least at an average rate of a student contribution.

***Recommendation 2***

Ensure that Enabling loading continues to be focussed on the full spectrum of educational disadvantage, diversity and inclusion, and does not become limited and narrowed to specific equity groups only, which is the threat of it being newly included in the Indigenous, Regional and Low SES Attainment Fund (IRLSAF).

***Recommendation 3***

NAEEA recommends uncapped places be provided to Enabling students and demand-driven funding for Enabling Programs be re-instated. A growing proportion of Enabling students are of First Nations background and the majority have experienced complex forms of educational disadvantage which compound over time due to limiting educational and social norms, as well as resourcing issues, within many communities.

***Recommendation 4***

To maintain quality teaching, effective student transitions to university and contextualised student support, Enabling places should only be available (as currently) through universities. Where Enabling loading is applied the learning should be provided in dedicated Enabling environments and align with the NAEAA course learning outcomes. All Enabling programs should also follow university quality assurance procedures, as for other CSP courses. While aligning to the above, universities require the flexibility to utilise Enabling loading according to contextualised approaches that acknowledge differences across States and regions and address a wide diversity of student learning needs.

***Recommendation 5***

Enabling be included in the AQF at levels dependent on the program and cohort type, given the wide range of diverse student needs, to ensure formal recognition of their achievement and enable access/portability across institutions. A flexible framework of pathway unit types at different AQF levels provide recognition of the diversity of study levels and different cohort needs, as well as changing student contexts. Short preparation stand-alone micro-units to develop competencies and longer Enabling Awards would form an integral part of this flexible and contextualised framework to enable access and success. This would make Enabling programs a much more attractive proposition for students, including to persist and move through the stages of their study.

### **Recommendation 6**

Enabling units continue to be counted towards credit in an Award to recognise student achievements and strengthen next steps into degrees.

### **Recommendation 7**

Ensure that there is an equitable distribution of CSPs in regional Australia to meet regional and national needs.

### **Recommendation 8**

Access to specific and additional financial and Centrelink support for Enabling students is important for those who experience educational disadvantage to take the step to access and prepare for university. Effective approaches could include:

- adding an internet allowance to student payments (such as Austudy, Abstudy, Youth Allowance and other types of financial assistance for parents and carers),
- small additional payments at census for students enrolled in Enabling units (up to a maximum amount for all units of Enabling study),
- amending Centrelink support eligibility to “students engaged in full time or part time study in Enabling programs”.

Mechanisms such as these would make a significant difference to the accessibility of educational opportunities and the subsequent study experiences of these students by supporting them to remain enrolled and committed to their studies.

The details of the above recommendations are discussed below.

### **Discussion**

The NAEAA strongly supports demand-driven places in Enabling programs to meet the needs of students from equity groups, respond to regional demands, and support progression to tertiary education. Building on quality practices developed by educators over decades, the bulk of Enabling programs emerged as a result of specific Government targets and incentives designed to encourage widening participation in higher education (Bradley et al. 2008). Since then, successive reviews of Enabling education have identified the importance of this pathway as ‘students from equity groups who articulate via an Enabling program generally experience better first-year retention rates than those articulating via most other sub-bachelor pathways’ (Pitman et al. 2016, p. 4). While HECS is a broadly equitable system, recent research shows that this cost still serves as a deterrent to those from the lowest socio-economic decile; and these students are well represented in Enabling programs (Harvey 2017; Stokes 2018).

Growing numbers of Australians are searching for supportive entry points to higher education, in order to further their knowledge and workforce participation. Enabling programs have established themselves as important pathways for students from equity groups who have proven difficult to engage through other mechanisms. For example; ‘[s]tudents from low SES backgrounds have more than twice the rate of representation at the [E]nabling level than they do at undergraduate level’ (Harvey 2017, p. 11) and ‘Aboriginal and Torres Strait Islander people represent 1.5 per cent of undergraduate students, but six per cent of [E]nabling students’ (Pitman et al. 2016, p. 37, cited in Harvey 2017, p. 11). Enabling programs represent an effective investment, both for the individual as a low-risk test of their ability at university, and for Government as this relatively low-cost intervention can work to break cycles of intergenerational poverty and welfare dependence, ultimately reducing costs (Harvey 2017, p. 12). For further information, please view this short clip

<https://youtu.be/Dc1Xea6SE0U>. As this research demonstrates, Enabling programs are an effective Government investment for engaging disadvantaged Australians and supporting their successful transition to university.

The key objective of the Enabling Loading Program (ELP) is to promote equality of opportunity in higher education with a focus on students with educational disadvantage. It is important to ensure that this is not reduced only to the three listed equity groupings for the IRLSAF (those from a low SES background, regional areas and remote areas, and Indigenous people), as the barriers to accessing higher education are much more complex and impactful for people from a wide diversity of backgrounds and ages. This is why, in response to sector feedback on the IRLSAF for Enabling, those with 'educational disadvantage' were also included in policy, not only 'those from a low SES background, regional areas and remote areas, and Indigenous people'. We need to be ambitious to enable equity of higher education access and inclusion to support and encourage lifelong learning opportunities. Engaging those who have, or who have previously, experienced complex forms of disadvantage, which impact opportunities to access and succeed in higher education and lifelong learning should not be limited to the narrow fields of formal equity groups. To do so would risk disrupting widening participation achievements to date and jeopardise future improvements to educational equity and participation rates.

Many past and present Enabling students report that Enabling programs provide them with a university style learning experience at a time when they are uncertain about their capability to be successful due to financial, family and academic considerations. Students appreciate their experience as an authentic 'taste' of the university learning environment and expectations and the opportunity to build the academic capabilities required to experience success. Enabling programs afford them a low-risk opportunity to decide whether to pursue higher education. Many past and present Enabling students have also reported that they would never have enrolled if they were charged higher education fees because a student debt while considering if university suits them is a clear deterrent (Pitman et., 2016; Harvey, 2017). It is important for all Australians to have the opportunity to go to university if they decide to, and an associated fee on their preparation to enter university would serve as a deterrent for underrepresented groups. Enabling programs will achieve the most impact through maintaining their current status as free, university-based programs, designed to support Australian citizens, Permanent Residents and Humanitarian visa holders to connect with university, extend social inclusion, and prepare for greater contribution to Australia's knowledge economy and workforce.

Research reveals consistently that students belonging to marginalised and designated equity groups are a majority in pathway programs (Jarvis, 2021; McKay et al., 2018; Pitman et al., 2016) and these students often find the initial costs of preparing to undertake university challenging. To improve accessibility for these students, improved models of financial support are needed to help them remain engaged in their studies. This includes the provision of financial aid to cover expenses such as textbooks, fast and reliable internet access, and living expenses. The majority of students from under-represented groups at university are engaged in part-time or full-time work to support themselves while preparing for, or undertaking, undergraduate study. Many of these students also rely upon some form of Centrelink support. Supporting these students to be successful requires making returning to study and part-time enrolment more financially viable. Enabling students often have to sacrifice time with families or in employment to start their studies and have limited access to equity scholarships.

### **Financial issues and improvements**

In order to increase the proportion of Enabling program students who are retained and equipped to

successfully complete university degrees the financial barriers that they face need to be removed or diminished. It is reasonable to suggest the following forms of support:

- Affordable, reliable and fast internet services are a necessity to make education accessible. It can be expensive for students in regional and remote areas to access the internet services required for university study. Adding an internet allowance to student payments (such as Austudy, Abstudy, and Youth Allowance) would make it easier for students to take advantage of educational opportunities.
- A significant proportion of Enabling students must engage in paid employment while studying to support themselves and their families, and this negatively impacts their capacity to engage fully in their studies. Offering even small additional payments at census for students enrolled in Enabling units (up to a maximum amount for all units in an Enabling program) would make a significant difference to their educational experiences and assist them to remain committed to their studies.
- At present students are required to be enrolled in full-time study to retain Centrelink support. This adds a considerable burden to the lives of equity group students enrolled in Enabling programs and has detrimental impacts on their ability to consistently engage with, and successfully complete, their studies. Adjusting Centrelink support eligibility to “students engaged in full time or part time study in Enabling programs” would significantly improve the accessibility of university study for equity group students who have complex lives and considerable other responsibilities. It would allow these students to retain their current levels of support while preparing themselves to engage successfully with undergraduate university study.

### **Regional Responsibility**

Regional universities and institutions outside major cities provide the only realistic and accessible option for many regional students to attend university. These students are tied to their communities for reasons of personal, cultural, family and work commitments, and financial circumstance. If regional universities are not adequately supported, many students will be disenfranchised. The regions need more highly skilled, university-trained professionals to drive the innovative industries of the future. The inequity in representation by Indigenous, regional and remote Australians at university must be addressed in the national interest via targeted policy. A higher proportion of Enabling places are required in the regions to address the relative socio-economic disadvantage of many regional students, the relatively low Year 12 completion rates in regional Australia, and the fact that many regional students are not well prepared to go directly into undergraduate degree programs. Many Indigenous communities are remotely and “very remotely” located, particularly in the Northern Territory. Including “return-to-base” funding would benefit these students by supporting them to attend Enabling programs on campus. These students often also benefit from orientation programs that focus on their individual needs and create a sense of community prior to the start of their term of study.

### **Removal from the IRLSAF and funding security for Enabling loading**

Under the Job Ready Graduates (JRG) package, Enabling Commonwealth Grant Scheme (CGS) funding has been included in the Higher Education Courses Maximum Basic Grant Amount (MBGA) CGS envelope with all other non-designated courses CGS funding. This means that Enabling CGS funding can be moved to other sub-bachelor, bachelor, and postgraduate courses but, once moved, cannot be reallocated back to Enabling. Because the Enabling loading of the EFTSL component paid by the Commonwealth in lieu of the student contribution is intended to be consistent with the actual CSP EFTSL, if the fixed target is not achieved due to lower enrolments in Enabling for a term, it is unclear if the Enabling Loading Program (ELP) will be retained in future allocations. This does not

provide financial certainty, or the flexibility required when Enabling numbers fluctuate according to changing population needs (in the context of demographic and employment trends). There should be acknowledgement that demand for Enabling will flex up and down to ensure that during periods of low demand, there is certainty that Enabling loading funding caps will not be reduced. The announced policy of the previous Government was to continue the loading as part of the Indigenous, Regional and Low SES Attainment Fund (IRLSAF) under the Other Grant Guidelines, until longer term policy for Enabling is set. Enabling programs should not be located under the IRLSAF with other unaligned funding types which do not focus on the provision of high-quality university course delivery. There is a lack of certainty in the way the IRLSAF will be developed to determine the loading from 2024.

Enabling Loading per CSP has remained constant at \$3,392 (paid in lieu of the student contribution). For Enabling programs, units of study which have a low Commonwealth contribution amount are not balanced by increases in student contributions (as they are for Bachelors) because the Enabling Loading provided is a flat \$3,392 for all units across all Fields of Education (FoEs). Some Enabling units important to the cohort and other equity groups fall under the lowest FoE Commonwealth contribution amounts, such as Indigenous studies, which is very concerning. The JRG change has meant that for many providers of Enabling, the Commonwealth contribution (paid in lieu of the student contribution) has reduced across different fields of study, whilst for Bachelor degrees the student contribution component has increased for those units. For many providers of Enabling, since there is no student contribution, this has led to decreased funds with which to resource these programs.

### **Australian Qualifications Framework (AQF)**

Currently, Enabling programs are not included in the AQF. Current practice is for each program to undergo viability checking via the home institution to ensure that demand is manageable and pathways to degrees are supported. As the sector has matured, it is timely to commence consideration of accrediting Enabling programs. The recent benchmarking project demonstrated the comparability of standards and outcomes for Enabling programs, which is significant (Davis et al., 2023). It makes visible the value and integrity of Enabling programs on a national scale and provides compelling evidence for inclusion in the AQF. A further benefit of inclusion in the AQF will be the portability of qualifications for students.

### **Credit**

Enabling units should continue to be counted towards credit in an Award, as is currently the case (see existing guideline below). The guidance however, should be clarified and updated in recognition of developments in pathways and in the context of micro-credentialing moving forward. The guidance should include Enabling units at the relevant AQF level that are offered concurrently in Awards to provide specific student cohorts with academic knowledge and skills development support. This would facilitate Enabling units, at appropriate AQF levels, making meaningful contributions to the Support for Students Policy currently under development by making them an available learning support to students enrolled in undergraduate programs.

Suggested change to the current wording in guidelines, from the current:

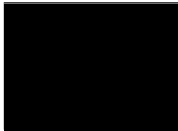
*“while it is possible for students to receive credit towards a higher education award course for units of study undertaken in their Enabling course, a course that consists primarily of units of study that lead to the higher education award that students are preparing to undertake, would not be an enabling course”.*

to instead become:

*“while it is possible for students to receive credit towards a higher education award for units of study undertaken in their Enabling course, and for Enabling units (at an appropriate AQF level) to be undertaken concurrently in a higher education award course to support a specific cohort requiring academic knowledge and skills development, a course that consists primarily of units of study that lead to the higher education award that students are preparing to undertake, would not be an Enabling course”.*

Thank you once again for the opportunity to contribute to the shaping of the Australian University Accord. NAEAA would welcome the opportunity to provide further input, as appropriate, to the considerations contained within the report as they evolve into firmer recommendations aimed at creating a larger, fairer, high equity, high participation Australian Higher Education system. Should the panel see further value in engaging with the Enabling sector, students and the communities we serve, NAEAA would gladly facilitate the opportunity.

Kind Regards



Karen Seary

Chair, National Association of Enabling Educators of Australia (NAEEA)

Email: [admin@enablingeducators.org](mailto:admin@enablingeducators.org)

## References

- Bradley, D, Noonan, P, Nugent, H & Scales, B. (2008). *Review of Australian Higher Education*, Commonwealth of Australia, Australia.
- Davis, C., Syme, S., Cook, C., Dempster, S., Duffy, L., Hattam, S., Lambrinidis, G., Lawson, K., Levy, S. (2023). Report on Benchmarking of Enabling Programs across Australia to the National Association of Enabling Educators of Australia (NAEEA). ISBN: 978-0-646-87548-4. <https://enablingeducators.org/wp-content/uploads/2023/03/Report-on-Benchmarking-of-Enabling-Programs-Across-Australia-2023.pdf>
- Harvey, A. (2017). 'Translating academic research to higher education policy reform: The case of enabling programs', *International Studies in Widening Participation*, vol. 4, no. 1, pp. 7-17.
- Jarvis, L. (2021). Try before you buy: Using enabling programs to negotiate the risks of higher education. *Australian Journal of Adult Learning*, 61(1). <https://ajal.net.au/downloads/try-before-you-buy-using-enabling-programs-to-negotiate-the-risks-of-higher-education/>
- McKay, J., Pitman, T., Devlin, M., Trinidad, S., Harvey, A., & Brett, M. (2018). The Use of Enabling Programs as a Pathway to Higher Education by Disadvantaged Students in Australia. In Agosti, C. I., & Bernat, E. (Eds.). *University Pathway Programs: Local Responses within a Growing Global Trend*. pp. 45-66. Springer International Publishing. <https://doi.org/10.1007/978-3-319-72505-5>
- Pitman, T, Trinidad, S, Devlin, M, Harvey, A, Brett, M & McKay, J. (2016). *Pathways to Higher Education: The Efficacy of Enabling and Sub-Bachelor Pathways for Disadvantaged Students*, National Centre for Student Equity in Higher Education (NCSEHE), Curtin University, Perth.
- Stokes, J. (2018). 'Students on the threshold: Commencing student perspectives and International Studies in Widening Participation', In *University Pathway Programs: local responses within a growing global trend*, edited by Agosti, C. and E. Bernat, Springer, Cham, pp. 223-242.
- Syme, S., Davis, C., and Cook, C. (2021). Benchmarking Australian enabling programmes: assuring quality, comparability and transparency. *Assessment & Evaluation in Higher Education*, 46(2), 572-585. <https://doi.org/10.1080/02602938.2020.1804825>