



11 February 2019

To whom it may concern,

As the Executive Board of the *National Association of Enabling Educators of Australia* (NAEEA), we write to provide a formal response to the 'Consultation Paper on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses' (Australian Government 2018). Our Executive Board is comprised of academics and practitioners from Australian universities and international representatives, who are elected by members to represent and progress enabling education, so we are well placed to provide a detailed response to this document.

The National Association 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; yet, 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 emerged as an important feeder pathway for students from equity groups who have proven difficult to engage through other mechanisms. For example; 'Students from low SES backgrounds have more than twice the rate of representation at the enabling 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). For these reasons amongst others, enabling program demand exceeds place allocation at many universities (Department of Education and Training 2018, p. 5). Enabling programs represent an effective investment, both for the individual who has a low-risk way to test 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 see 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.

For these reasons, the position of the National Association is that additional places are needed in enabling programs to support the successful transition to university of students from equity groups; therefore, a demand-driven model is most effective. The 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. Currently, each program undergoes 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. NAEEA wishes to propose that this discussion be commenced between the National Association, working in collaboration with the Department and TEQSA. The development of accredited enabling programs would allow for greater recognition and portability between enabling programs and institutions. While a demand-driven model is most effective, we also wish to advise that alternate models for place allocation have emerged through the *NAEEA Research Special Interest Group*. These include: using the HEPPP formula so that ‘universities with the most number of LSES undergraduate students would be rewarded with a high allocation of Enabling places’, or to ‘provide universities with the flexibility to transfer load between postgraduate and Enabling levels according to their need’ (Harvey 2017, pp. 9-10). In this way, any reallocation could respond to student need and national interest. We welcome the opportunity for further dialogue with the Department to discuss these programs and assess options for allocating enabling places.

In response to the summary questions on page 15 of the consultation paper, specifically with regard to section 2.3 *Consultation issues - enabling places*, we wish to provide the following advice:

1. Geographic representation is an important consideration in the distribution of places for fee-free enabling programs. This criteria helps manage equitable access to higher education for students from equity groups, including rural and regional students, students from ATSI, and from low-SES backgrounds. Geographic representation allows responses to specific regional needs, including areas of high youth unemployment, or domestic NESB students. The philosophy underpinning both enabling programs and Government widening participation targets is equitable distribution of university places on the basis of proportional demographic representation, therefore geographical representation is critical. For students to attend their university of choice, for both reasons of equity and supporting regional development, it is recommended that this access continues to commence at the enabling level.
2. The minimal viable allocation for enabling programs is best determined by the individual universities. University programs are required to undergo accreditation processes, including developing a business case which identifies student numbers for program viability. Therefore, this process is well managed by universities and it is in their interests to determine appropriate student numbers for the ongoing viability of programs.
3. Enabling program place distribution should be set at a minimum of five years. This will allow for load planning in institutions, and best outcomes for students. Given the cost of establishing and running programs, retention of quality staff, and the specialist nature of enabling teaching, a reduction below a five year cycle would be damaging for student outcomes and the sector as a whole. This feedback considers enabling; however sub-bachelor and post-graduate would also likely benefit from a minimum five year cycle.
4. Given the need to respond to geographic and market demands, there is no set proportion of enabling places that should be re-allocated. Assignment of an arbitrary re-allocation figure would be damaging for established and effective programs. It would be more effective to explore alternative reallocation options which are grounded in sector research.
5. NAEEA is able to represent stakeholders’ views, including students, communities and universities, with a particular focus on people involved in undergraduate teaching. Regarding the suggested allocation criteria (page 12):
  - a. *Student progression to further study at tertiary level*: student progression in the enabling sector is leading transition practices; however, this data also highlights the complexity of student outcomes and measurement needs further evaluation. Regarding the identified progression rate of just over 50 per cent, there are successes not captured in this data, as this does not recognise students who sit the STAT, or those who engage in non-linear studies and take longer to complete. Within enabling, there is also the presence of positive attrition,

where students complete the enabling program, yet choose to go on to the workforce rather than undergraduate. In this case, the social inclusion function of enabling is fulfilled; however, the data will not capture this as success, as the student does not progress to undergraduate. Enabling programs act as a small financial investment with ongoing impact in individual lives. As such, the definition of success and analysis of data from enabling programs needs to recognise this complexity, rather than focus on a one-year, linear transition to undergraduate model.

- b. *Existing utilisation of places*: The utilisation of places will provide the most benefits as demand-driven rather than capped places. This should only operate for accredited programs, provided by universities. As noted previously, we suggest that NAEEA contribute to the decision-making on accreditation, to ensure quality teaching and utilisation of places in line with student and Government best interests. Universities are guided by a specific commitment to strengthening local communities and a broader equity mission, which is aligned with and supported by Government initiatives, such as HEPPP and Regional Study Hubs. At universities, as opposed to for-profit providers, the interest is in identifying and supporting committed students to gain the benefits of education, including transition to undergraduate degrees and social inclusion, alongside workforce participation.
- c. *Profile of commencing students*: Enabling programs are designed to respond to specific demographic needs in line with geographic distribution. It is important that the profile of commencing students serves the profile of the institution's catchment area. This assists in countering educational disadvantage and increases proportional representation of equity groups. In assessing student needs, it is worth revisiting issues of definition as there is some regional variation and emerging equity groups which are not currently reflected in the government definition.
- d. *Innovative teaching models*: Enabling education is a space in which innovative teaching models are emerging due to the increased need to support students from diverse backgrounds. NAEEA wholeheartedly supports the development of innovative, quality teaching which values knowledge students bring to the academy and supports them to develop academic skills for success at university and other accredited tertiary providers. Educators in enabling programs must have qualifications at least one level above the students in order to support quality teaching (i.e. Bachelor degree as a minimum qualification).

*Weighting to criteria*: NAEEA advocates that program place allocation becomes demand-driven, with places determined by universities, providing fee-free, accredited enabling study to students from equity groups to support their progression to tertiary study, employment, and/or greater societal participation. As university programs are required to present a business case for institutional approval, this would allow viability to be measured in a manner which responds to regional needs.

- 6. In order to maintain quality teaching and student support, enabling places should only be available through accredited university enabling programs. Universities who wish to establish enabling programs, will be required to present a business case to meet their institution's quality standards. We also recommend that these programs have a national accreditation, which NAEEA could manage. We have evidence to support the individual and national benefits of high quality enabling programs, and believe that extending their delivery through a demand-driven model, will maintain and extend best practice student learning outcomes.

We would be delighted to discuss these recommendations further with Department representatives. Please contact NAEEA President Karen Seary to further this discussion. We hope that this submission is the beginning of an ongoing conversation between NAEEA and the Department to support our

shared goals of maintaining quality education and widening participation for the benefit of all Australians.

Yours faithfully,



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### **References**

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