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Introduction

The National Association of Enabling Educators of Australia (NAEEA) appreciate the opportunity to provide a voice to the Australian University Accord. NAEEA is providing a general response to the discussion paper within specifically identified focus areas, with recommendations that relate specifically to Enabling Education in Australia and the theme of *Access and Opportunity*.

NAEEA applauds the Australian Governments’ future commitment to ensuring that all students have access to higher education, no matter their personal circumstances. The association echoes Minister Jason Clare’s sentiment that “Where you live, how much your parents earn, whether you are Indigenous or not, is still a major factor in whether you are a student or graduate of an Australian university” and should not be! Enabling programs, designed and proven as a successful pathway to university, targeting all identified equity groups within Australia, are ideally situated to assist the government to address the persistent problem of unequal representation in higher education. Considering more than 43 per cent of Australians aged between 25 and 34 have a bachelor’s degree but the figure is only 20 per cent for those from a low socio-economic background, 16 per cent from a remote area and less than 10 per cent for Indigenous Australians gives voice to the potential for Enabling education to address inequity in access, participation and attainment. The lower rates of participation and educational attainment experienced by underrepresented groups in Australia, the target groups for Enabling programs, is deeply concerning. It is clear the University Accord envisages a more equitable Australia. NAEEA can provide a full and clear view of what Enabling programs can offer in providing the opportunity for underrepresented groups to participate in tertiary level study, achieve a changed and improved life through education and subsequently contribute professionally to their communities. The Enabling education sector can make a vital contribution to the vision of a more equitable Australia.

The National Association of Enabling Educators of Australia (NAEEA)

NAEEA, established in 2012, is a collaborative organisation cultivated from two decades of networking by Enabling educators from across Australia and New Zealand. It is closely aligned with the Foundation and Bridging Educators of New Zealand (FABENZ) and the Forum for Access and Continuing Education (FACE) in the United Kingdom. It shares with these organisations, a commitment to the principles of widening participation, with a particular focus on supporting and advocating for the ongoing provision of pathways education programs which provide non-traditional, novice students, access to and preparation for further studies in higher education. The NAEEA Executive group comprises twelve members, representing nine institutions, eight

Australian and one New Zealand university. These include Central Queensland University, Charles Darwin University, Edith Cowan University, Federation University, Murdoch University, University of Newcastle, University of South Australia, University of Southern Queensland, and Auckland University. NAEAA membership encompasses educators from all Australian institutions currently delivering Enabling programs. The collegial and supportive nature of NAEAA, its work in establishing strong sector-wide ties, and its unswerving commitment to Enabling education across Australia has established a strong collaborative framework which is now characteristic of the sector.

Enabling Programs

Enabling programs are non-award courses offered by universities and private providers to prepare students with the required skills and knowledge for undergraduate study (Department of Education, Skills and Employment, 2021). For many decades and hundreds of thousands of students, Enabling education programs have provided entry to higher education awards. They have prepared students for their study by developing their knowledge of the university environment and its academic expectations, as well as essential discipline knowledge. Enabling programs are designed to equip unprepared students for University study. The programs have a strong social justice underpinning which facilitates student agency to develop a self-belief in their ability to succeed at the tertiary level, regardless of their educational attainment level or background. The holistic and critical pedagogy embraced by Enabling programs empower students to reimagine themselves as capable and successful learners.

There are 48 enabling programs across Australia that provide an entry pathway into university for students who would otherwise be excluded from higher education (Habel et al., 2016). In 2020, 32,579 students were enrolled in Australian enabling programs (Department of Education, 2022). These programs typically attract students from low socio-economic backgrounds and other equity groups who have previously found higher education inaccessible (Syme, Roche et al., 2021). The programs are specifically designed to build students' confidence and the academic skills, knowledge and attributes needed for successful transition to higher education. Enabling education is an excellent strategy because more equity-group students transition to university through these preparatory programs than through associate degrees, diplomas and other non-school pathways combined. Students entering university via Enabling programs have a similar retention and completion rates as students entering via traditional school pathways.

The NAEAA Framework: Enabling Guidelines on Course Learning Outcomes and Quality Assurance

While Enabling education programs have existed in Australia since the mid-1980s (May & Bunn, 2015), they developed in isolation at individual universities. This factor, and their apparent diversity, has meant they have sometimes been viewed as lacking transparency (Pitman et al., 2016). This is not the case. Based upon research findings (Relf et al., 2017; Syme et al., 2021), a rigorous and efficacious framework has been established over the years by the National Association of Enabling Educators of Australia (NAEAA), which has played a leading role in implementing the now established guidelines on Enabling Course Learning Outcomes, quality assurance and professional learning activities, which member institutions follow. These institutions apply the same university compliance processes to their Enabling programs as they do for all other university courses.

Benchmarking Project: Sampling of Enabling Programs in Australia

The NAEAA has also supported various initiatives, including the national bi-annual conference and regular professional development opportunities. A significant initiative has been the recent national cross-institutional study of Enabling programs in Australia, a key driver for which was to investigate unit-level consistency across the Enabling sector (Davis et al., 2023). This comprehensive benchmarking report of nine Australian Enabling programs across Australia features seven key findings which showcase that, in spite of variations across the programs in terms of duration, structure, assessment number and type, there is notable comparability of curriculum and learning outcomes among the academic literacy and mathematics units. All universities also covered the same topics and learning outcomes in the study preparation unit but with a range of assessment types and volume of learning. The learning activities, assessment and learning outcomes in all three units were constructively aligned (Biggs, 2012). The researchers also found a congruence in moderation processes and pedagogies enacted in the Enabling programs. The report's findings highlight the rigour of these programs showing a commitment to high standards and challenging curricula to appropriately prepare students for the demands of undergraduate studies.

Focus Area 1

Enabling programs as tuition fee-free, demand-driven funded and focused on educational disadvantage

The National Association of Enabling Educators 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 university 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). 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 these budget costs (Harvey 2017, p. 12). For further information, please view this short clip <https://youtu.be/Dc1Xea6SEOU>. 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 access and inclusion - to capture those who have, or who have previously, experienced complex forms of disadvantage, which impact on the opportunity to access and succeed in higher education, outside the narrow fields of formal equity groups - otherwise we risk disrupting achievements to date or never improve equity and widening participation statistics.

Many past and present Enabling students say they would never have considered enrolling if they were charged higher education fees because the Enabling programs provided them with a university style learning experience at a time when they were not sure about their capability due to financial, family and academic considerations (Relf et al, 2022). Enabling programs afford these students a low-risk opportunity to decide whether or not to pursue higher education (Relf et al, 2022). A student debt while considering if university suits them is a clear deterrent (Pitman et., 2016; Harvey, 2017). Students appreciate their experience as an authentic 'taste' of the university learning environment and expectations. They are provided with the opportunity to build the academic capabilities required to succeed in higher education. 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.

Focus Area 2

Enabling funding in an equitable Higher Education model

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. One consequence of this is 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 provides no flexibility or certainty of funding when Enabling numbers reduce and grow in relation 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 pathways 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 pathways, courses 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 courses across all Fields of Education (FoEs). Some Enabling courses 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 courses. For many providers of Enabling, since there is no student contribution, this has led to decreased income.

Focus Area 3

Access to additional financial and Centrelink support for (Enabling) students who experience educational disadvantage

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.

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 costly 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 program students have to engage in paid employment while studying in order to support themselves and their families, and this negatively impacts their capacity to engage fully in their studies. Offering small scholarships (even \$1,000) would make a significant difference to the educational experiences of these students and assist them remain committed to their studies.

- At present students are required to be enrolled in full-time study in order 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 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 often have complex lives and considerable other responsibilities. It would allow these students to retain their current levels of support while preparing themselves to engage with undergraduate university study.

Focus area 4

Enabling programs to be included in the Australian Qualifications Framework (AQF) as accredited courses

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 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, thus safeguarding these programs for generations of students to come. A further benefit of inclusion in the AQF will be the portability of qualifications for students.

Enabling units should continue to be counted towards credit in an Award, as is currently the case (see current wording from the existing guidelines below). The guidance however, should be clarified and updated in recognition of developments in pathways and in the context of micro-credentialing moving forward, to also include Enabling units at the relevant AQF level) offered concurrently in Awards and provided to specific student cohorts who benefit from units which incorporate foundational knowledge and academic skills development support.

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 units of study undertaken concurrently in a higher education award course if the unit of study within the award is delivered at the appropriate Enabling AQF level (3-5) and to a specific cohort requiring foundational knowledge and academic skills development, other units of study leading to a higher education award would not be an enabling course.

It would be beneficial to enable a diversity of fee-free (previously known as Enabling) university pathway and foundational learning options, building in recognition of AQF level 3-5 *Pathway and Foundational Courses* (previously known as Enabling units) which educationally disadvantaged students benefit from in order to be successful. This speaks strongly to the

critical retraining needs of people across the country, particularly in regional areas, as we experience industrial change as a result of energy transitions.

Focus Area 5

Reinstate Enabling Programs in legislation to enable flexibility and nurture the development of student success

Enabling students have their enrolment supported through CSP funding and have thus been included in the Job-Ready Graduates legislation, alongside their undergraduate counterparts. On commencement of study, they are required to achieve and maintain a reasonable completion rate to retain their government funding and enrolment. Students who are unable to meet the required completion rate will have their enrolment discontinued. Currently, under the JRG, if Enabling (along with other sub bachelor) program students do not achieve 50% or more successful completion of four courses, they are included in the requirement to revoke their Commonwealth funding. The more than 50% pass requirement introduces barriers which are not applied to more advantaged students undertaking a degree in which a pass rate is applied to eight courses, rather than four.

This is highly problematic for Enabling students, an historically underrepresented group within the sector, mostly first in family, from low socio-economic backgrounds, many from an Indigenous/First Nations background, and many presenting with mental health or other challenges. Students' circumstances often impact their ability to engage effectively at the tertiary level, particularly when they first enrol at university. This often results in an initial low completion rate (failing more than 50% of units first attempted); that improves once students receive sufficient and appropriate support in the form of equitable adjustments and inclusive teaching. The pedagogical practices which are embedded soundly in Enabling programs across Australia provide appropriate support and preparation for non-traditional, novice students entering the higher education system. Institutions offering Enabling programs have evidence of a plethora of alumni and current students who, if judged on their 'potential' so early in their studies, would have had their enrolment cancelled. Enabling programs provide these students with the support and time to adapt to the university learning environment and have subsequently gone on to degree level study, succeeded, and attained employment in a wide-array of professions.

As Enabling students enter an environment very foreign to them, they find themselves challenged to bridge the gap of knowledge, skills and understanding of what it means to be a 'university' student. To 'find their feet' and adjust to the higher education system takes time, a shift in mindset and dedicated support from the institution if the vision of a changed life through education is to be achieved for this cohort. The new legislative requirement under JRG to pass more than 50% of courses/units establishes a barrier to building students' confidence and belief that, with the appropriate supports in place, and given the appropriate time to adjust to the new learning environment, they will succeed at university.

NAEEA therefore has significant concerns about the impact this legislation is currently having on Enabling, nation-wide. Enabling education within Australia is government funded, with students representing all government designated equity groups. These students face additional challenges to overcome their disadvantage and use Enabling programs as a pathway to enter higher education. Whilst the Job-Ready Graduates package was in part designed to enhance student protection and provider integrity, it fails to acknowledge the policies that many universities already have in place to actively identify and withdraw non-participating students

and significantly negatively impacts genuine Enabling students. Enabling students should not experience new barriers to accessing and progressing through higher education, so the Job Ready Graduates more than 50% fail policy applied to four courses should be removed. Enabling students do not pay a student contribution and do not accrue HECS; therefore, the more than 50% pass requirement is redundant and should be removed from the JRG requirements as they relate to Enabling programs.

Focus Area 6

Rural, Regional and Remote Responsibility

Regional universities provide the only realistic 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 relatively higher proportion of Enabling places are required in the regions in view of 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 having them able to attend Enabling programs on campus. These students often benefit from induction programs that focus on their individual needs and create a sense of community prior to the start of their term of study. These pre-degree enabling courses should be adequately funded to encourage more indigenous students to participate.

Recommendations

The National Association of Enabling Educators of Australia makes the following recommendations to the Australian Universities Accord in relation to Enabling Education in Australia:

Recommendation 1

Retain Enabling Programs as free of tuition fees and consistent with costs of delivery, as for other high-quality higher education courses

Recommendation 2

Enabling programs continue to be focussed on educational disadvantage, diversity and inclusion.

Recommendation 3

Re-instate demand-driven funding for Enabling Programs

Recommendation 4

Access to additional financial and Centrelink support for Enabling students who experience educational disadvantage

Recommendation 5

Enabling students to be eligible for scholarships as financial support while studying

Recommendation 6

Enabling courses are adequately funded, with the Enabling loading component changed to be provided at least at an average rate of a student contribution.

Recommendation 7

All Enabling units be required to map to the established NAEEA framework: AQF 3-5 levels depending on cohort and unit type; NAEEA Course Learning Outcomes; and University unit quality assurance, as for other CSP courses.

Recommendation 8

Enabling be included in the AQF at levels dependent on the program and cohort type, to ensure formal recognition of their achievement and enable access/portability across institutions.

Recommendation 9

Enabling units continue to be counted towards credit in an Award

Recommendation 10

A new flexible framework of pathways and foundation unit types provides 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 Foundation Awards would form an integral part of this flexible and contextualised framework to enable access and success. This would make enabling pathways a much more attractive proposition for students, including to persist and move through the stages of their study.

Recommendation 11

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

Recommendation 12

Exempt Enabling students from the Job Ready Graduate (JRG) requirements and produce more enabling approaches to legislation.

In closing, on behalf of the National Association of Enabling Educators of Australia, I thank you once again for the opportunity to contribute to the shaping of the Australian University Accord.

Kind Regards



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