NATIONAL ASSOCIATION OF ENABLING EDUCATORS OF AUSTRALIA

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

16 December 2022

Dear Mary O'Kane and the Australian Universities Accord Panel,

Thank you for the invitation to provide feedback on the priority issues outlined in the Terms of Reference for the Review.

The National Association of Enabling Educators of Australia (NAEEA) is providing feedback on the theme of *Access and Opportunity*.

NAEEA emphasises the following points and recommendations for ensuring equity of opportunity for students who have experienced challenges in their previous education, including First Nations and other students from equity groups to not only access higher education but be set up for success in their next stages of their learning journey.

For many decades and hundreds of thousands of students, Enabling education programs have enabled entry to higher education awards and prepared those students for their study by developing their knowledge of the university environment and its academic expectations, as well as essential discipline knowledge.

The NAEEA advise that moving forward, it is important that:

1. **Recommendation: Enabling Loading Funding is protected and consistent as a key future commitment and priority for higher education**

   - 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, and vice versa.
   - 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 certainty regarding the flexibility required 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.

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- 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.
- There is a lack of certainty in the way the IRLSAF will be developed to determine the loading from 2024.

2. **Recommendation: Enabling programs continue to be focussed on equity, diversity and inclusion.**

- The key objective of the ELP is to promote equality of opportunity in higher education with a focus on students with educational disadvantage, such as those from a low SES background, regional areas and remote areas, and Indigenous people. 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'.

3. **Recommendation: Enabling is included in the AQF** at levels 3-5, depending on the program and cohort type, to ensure formal recognition of their achievement and enable access/portability across institutions.

4. **Recommendation: Enabling courses are adequately funded, with the Enabling loading component changed to be provided at least at an average rate of a student contribution.**
   - 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 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 <u>reduced</u> across different fields of study, whilst for Bachelors 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.

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

Suggested change from 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.*

6. **Recommendation: 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 4 courses should be removed.**
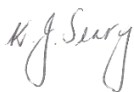
   - Currently, under the JRG, if Enabling (including sub bachelor) students do not achieve 50% or more successful completion of 4 courses, they are included in the requirement to revoke their Commonwealth funding.
   - The more than 50% pass requirement introduces barriers which are not applied to more advantaged students in a degree because the policy applies to 8 courses, not four.
   - 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.

Consultation on the Accord
We strongly encourage the Accord Panel to engage with the NAEEA and Enabling sector on the development of the Accord.

Thank you for your time and consideration of the above and the importance of the Enabling sector for its long and effective history in serving as the primary mechanism for enabling access and delivering on the successful equity gains so far achieved for Australian higher education.

Kind Regards

K. J. Seary

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