



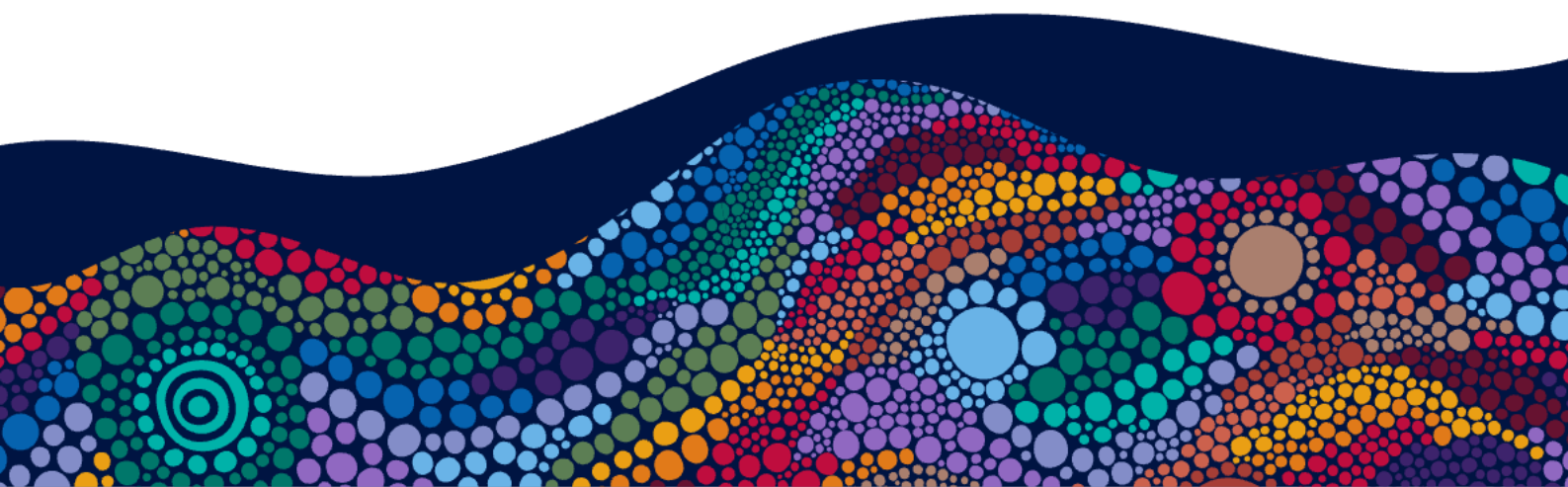
NACCHO

National Aboriginal Community
Controlled Health Organisation

Universities Accord (Opening the Doors of Opportunity) Bill 2026

Submission to the Education and
Employment Legislation Committee

July 2026



About NACCHO

NACCHO is the national peak body representing 148 Aboriginal Community Controlled Health Organisations (ACCHOs). We also assist a number of other community-controlled organisations.

The first Aboriginal medical service was established at Redfern in 1971 as a response to the urgent need to provide decent, accessible health services for the largely medically uninsured Aboriginal population of Redfern. The mainstream was not working. So it was, that over fifty years ago, Aboriginal people took control and designed and delivered their own model of health care. Similar Aboriginal medical services quickly sprung up around the country. In 1974, a national representative body was formed to represent these Aboriginal medical services at the national level. This has grown into what NACCHO is today. All this predated Medibank in 1975.

NACCHO liaises with its membership, and the eight state/territory affiliates, governments, and other organisations on Aboriginal and Torres Strait Islander health and wellbeing policy and planning issues and advocacy relating to health service delivery, health information, research, public health, health financing and health programs.

ACCHOs range from large multi-functional services employing several medical practitioners and providing a wide range of services, to small services which rely on Aboriginal health practitioners and/or nurses to provide the bulk of primary health care services. Our 148 members provide services from about 550 clinics. Our sector provides over 3.1 million episodes of care per year for over 410,000 people across Australia, which includes about one million episodes of care in very remote regions.

ACCHOs contribute to improving Aboriginal and Torres Strait Islander health and wellbeing through the provision of comprehensive primary health care, and by integrating and coordinating care and services. Many provide home and site visits; medical, public health and health promotion services; allied health; nursing services; assistance with making appointments and transport; help accessing childcare or dealing with the justice system; drug and alcohol services; and help with income support. Our services build ongoing relationships to give continuity of care so that chronic conditions are managed, and preventative health care is targeted. Through local engagement and a proven service delivery model, our clients 'stick'. Clearly, the cultural safety in which we provide our services is a key factor of our success.

ACCHOs are also closing the employment gap. Collectively, we employ about 7,000 staff – 54 per cent of whom are Aboriginal or Torres Strait Islanders – which makes us the third largest employer of Aboriginal or Torres Strait people in the country.

Enquiries about this submission should be directed to:

NACCHO

Level 5, 2 Constitution Avenue

Canberra City ACT 2601

Telephone: 02 6246 9300

Email: policy@naccho.org.au

Website: naccho.org.au



Recommendations

NACCHO recommends:

- 1** Any changes to the Universities Accord align with the National Agreement and its four Priority Reform Areas.
- 2** A parity goal for Aboriginal and Torres Strait Islander university enrolments.
- 3** Funding agreements with universities include a formal commitment to cultural safety and anti-racism.
- 4** Managed Growth Funding performance indicators are based on student completions rather than student enrolments to incentivise student retention.
- 5** Prioritising the development of stronger pathways from VET qualifications into higher education for Aboriginal and Torres Strait Islander students.
- 6** More transparency around the algorithm for determining Needs-based Funding.
- 7** A proportion of Needs-based Funding is directed towards Aboriginal and Torres Strait Islander specific students supports, delivered in partnership with local Aboriginal and Torres Strait Islander community-controlled organisations.
- 8** Needs-based Funding is used to provide additional scholarships for Aboriginal and Torres Strait Islander students and culturally safe support services such as mentoring and tutoring.
- 9** Mandatory training for lecturers and other academic staff at universities, covering cultural safety, adult learning principles, facilitation and supervision.
- 10** Needs-based Funding is used to provide affordable accommodation for Aboriginal and Torres Strait Islander student near campuses – including accommodation suitable for families.
- 11** A national program for Aboriginal and Torres Strait Islander students to access free or heavily subsidised textbooks, lab equipment and other specialised gear.
- 12** Ensuring Commonwealth-supported places are made available to ACCRTOs across all jurisdictions.
- 13** Degrees in priority skills, such as nursing and allied health, are further incentivised in order to build the workforce.

Acknowledgements

NACCHO welcomes the opportunity to provide a submission to the Education and Employment Legislation Committee. NACCHO would like to acknowledge the valuable input received to this submission. NACCHO supports the submissions to this consultation made by NACCHO Members and Affiliates.

National Agreement on Closing the Gap

Advocating for and securing the National Agreement on Closing the Gap was an historically significant act of Aboriginal and Torres Strait Islander self-determination. The National Agreement is evidence of a new era of engagement by and with Aboriginal and Torres Strait Islander people. It commits Australia to a new direction and is a pledge from all governments to fundamentally change the way they work with Aboriginal and Torres Strait Islander communities and organisations – to support self-determination and build the capacity of the community-control sector.

Tertiary education directly relates to two of the targets of the National Agreement on Closing the Gap:

- Target 6: By 2031, increase the proportion of Aboriginal and Torres Strait Islander people aged 25-34 years who have completed a tertiary qualification (Certificate III and above) to 70 per cent.
- Target 7: By 2031, increase the proportion of Aboriginal and Torres Strait Islander youth (15-24 years) who are in employment, education or training to 67 per cent.

This Government's first Closing the Gap Implementation Plan commits to achieving Closing the Gap targets *through implementation of the Priority Reforms*. This represents a shift away from focussing on the Targets, towards the structural changes that the Priority Reforms require, and which are more likely to achieve meaningful outcomes for our people in the long term.

The reforms and targets outlined in the National Agreement seek to overcome the inequality experienced by Aboriginal and Torres Strait Islander people, and achieve life outcomes equal to all Australians. Governments at all levels have committed to the implementation of the National Agreement's four Priority Reform Areas, which offer a roadmap to meaningfully impact structural drivers of poor health and social outcomes for Aboriginal and Torres Strait Islander people:

Priority Reform Area 1 – Formal partnerships and shared decision-making

This Priority Reform commits to building and strengthening structures that empower Aboriginal and Torres Strait Islander people to share decision-making authority with governments, and to accelerate policy making that centres Aboriginal and Torres Strait Islander voices.

Priority Reform Area 2 – Building the community-controlled sector

Recognising that community-controlled services achieve better outcomes, employ more Aboriginal and Torres Strait Islander people and are often preferred over mainstream services, this Priority Reform commits to building Aboriginal and Torres Strait Islander community-controlled sectors to deliver services to support Closing the Gap.

Priority Reform Area 3 – Transformation of mainstream institutions

This Priority Reform commits to systemic and structural transformation of government organisations to identify and eliminate racism, embed and practice cultural safety, deliver services in partnership with Aboriginal and Torres Strait Islander people, support truth telling about agencies' history with Aboriginal and Torres Strait Islander people, and engage fully and transparently with Aboriginal and Torres Strait Islander people when programs are being changed.

Priority Reform Area 4 – Sharing data and information to support decision making

This Priority Reform commits to shared access to regional data and information to inform local-decision making and support achievement of the first three Priority Reforms. This Priority Reform supports principles of Indigenous Data Sovereignty.

Despite some progress, the need for fundamental systemic reform remains evident. In its first review of the National Agreement on Closing the Gap, the Productivity Commission found that governments are not adequately delivering on their commitments. Despite support for the Priority Reforms and some good practice, progress has been slow, uncoordinated, and piecemeal.

The Commission noted that to enable better outcomes, governments need to relinquish some control, share decision making and acknowledge that Aboriginal and Torres Strait Islander people know what is best for their communities. Aboriginal Community Controlled Organisations, must be treated as critical partners rather than passive funding recipients, and trusted to design, deliver and measure government services in ways that are culturally safe and meaningful for their communities.

‘Too many government agencies are implementing versions of shared decision-making that involve consulting with Aboriginal and Torres Strait Islander people on a pre-determined solution, rather than collaborating on the problem and co-designing a solution’¹

NACCHO recommends any changes to the Universities Accord align with the National Agreement and its four Priority Reform Areas.

Background

The Bill had three main amendments to existing Acts, to:

- 1 Embed the new Managed Growth Funding System to support growth in domestic students, including those from low socioeconomic and regional and remote backgrounds;
- 2 Establish demand driven Needs-based Funding to support students from low socioeconomic backgrounds, Aboriginal and Torres Strait Islander students, and students studying at regional campuses
- 3 Formalise the role of the Australian Tertiary Education Commission in allocating Commonwealth supported places for higher education courses to higher education providers.²

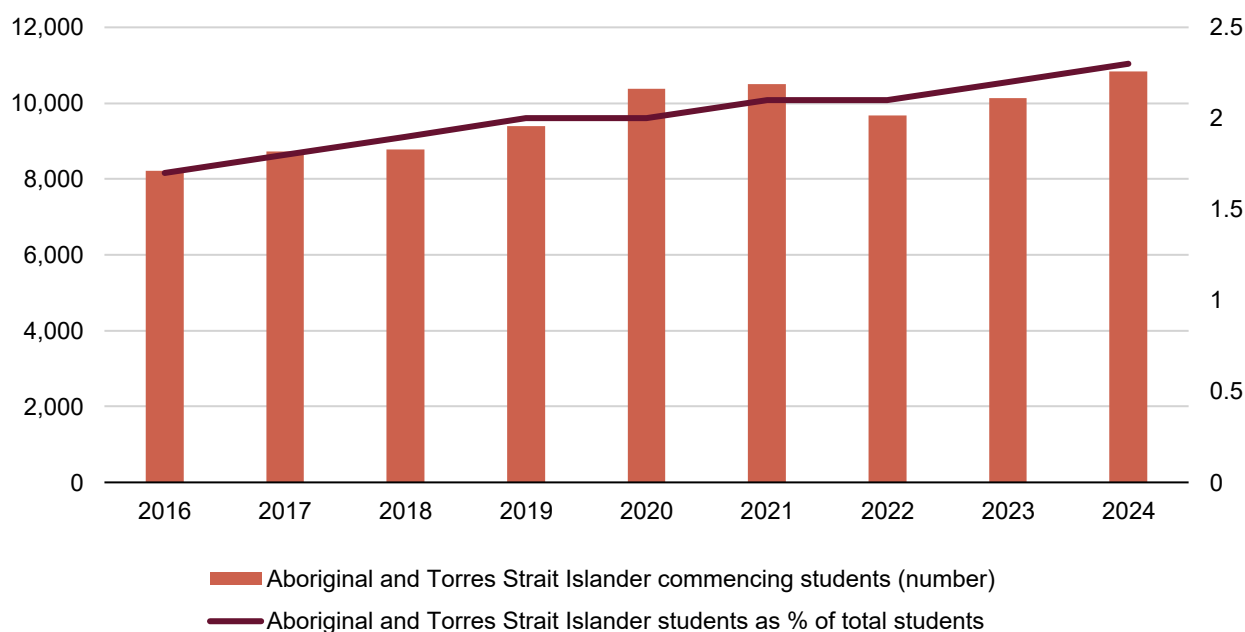
NACCHO welcomes the approach to improve the university sector for Aboriginal and Torres Strait Islander students (and other students experiencing barriers).

While university enrolment numbers grew significantly for Aboriginal and Torres Strait Islander students from 2016 to 2024, enrolments are still well below population parity at just over 2.3 per cent (Figure 1).

¹ Productivity Commission, Review of the National Agreement on Closing the Gap, Study Report, Canberra, 7 Feb 2024 <https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report>.

² House of Representatives, Explanatory Memorandum: Universities Accord (Opening the Doors of Opportunity) Bill 2026, https://parlinfo.aph.gov.au/parlInfo/download/legislation/ems/r7501_ems_6158ae36-feb5-4d94-b3b3-4d08fd66df7f/upload_pdf/JC018494.pdf;fileType=application%2Fpdf.

Figure 1: Number of Aboriginal and Torres Strait Islander commencing higher education students and proportion of total students who were Aboriginal and Torres Strait Islander, 2016-2024



Note: Figure made by NACCHO based on published Higher Education Student Statistics.³

Enrolments have improved over time, however completion rates have not kept pace. The 4-year completion rate for Aboriginal and Torres Strait Islander students who commenced their bachelor-level degree⁴ in 2012 was 28.3%.⁵ There have been small fluctuations over time, however most recent completion rates from Aboriginal and Torres Strait Islander students commencing in 2021 found the 4-year completion rate to be 28.4%.⁶ The low rate of completions for Aboriginal and Torres Strait Islander students reflects the fact the university system isn't working for them.

The Bill's explanatory memorandum notes that:

The Bill supports an additional investment of \$2.5 billion by the Australian Government in the higher education funding system over the medium term and is expected to result in an extra 200,000 commencing domestic students at university over the next decade. In particular, the Bill will support more students from low socioeconomic backgrounds, First Nations students and students studying at regional campuses to participate and succeed at university.⁷

This investment presents a great opportunity for many students. However, NACCHO urges that this funding is spent with student experience and outcomes in mind.

³ Department of Education, Key findings from the 2024 Higher Education Student Statistics, Feb 2026, <https://www.education.gov.au/higher-education-statistics/student-data/selected-higher-education-statistics-2024-student-data/key-findings-2024-higher-education-student-statistics>.

⁴ Including only Table A and Table B providers.

⁵ Department of Education, 2024 Section 17 – Completion Rates, September 2025, <https://www.education.gov.au/higher-education-statistics/resources/2024-section-17-completion-rates>.

⁶ Department of Education, 2024 Section 17 – Completion Rates, September 2025, <https://www.education.gov.au/higher-education-statistics/resources/2024-section-17-completion-rates>.

⁷ House of Representatives, Explanatory Memorandum: Universities Accord (Opening the Doors of Opportunity) Bill 2026, https://parlinfo.aph.gov.au/parlInfo/download/legislation/ems/r7501_ems_6158ae36-feb5-4d94-b3b3-4d08fd66df7f/upload_pdf/JC018494.pdf;fileType=application%2Fpdf.

NACCHO recommends a parity goal for Aboriginal and Torres Strait Islander university enrolments.

Cultural safety

Cultural safety is critical for improving enrolments and completions for Aboriginal and Torres Strait Islander students. Structural change is required to deliver this. Systemic racism within the university sector must be addressed and training needs to be tailored and culturally safe.

Cultural safety and student success is an organisation-wide responsibility.⁸ It must be led from the top and have genuine oversight through national governance structures. Locally contextualised cultural safety training for *all* staff is critical: from the Vice Chancellor and Executive to academic and professional staff. Cultural safety must be embedded in organisational culture – this is critical to developing and supporting culturally safe practice and environments. Without a supportive organisational leadership and culture, training for client-facing or senior staff alone is unlikely to deliver culturally safe learning environments. The University of Newcastle's Cultural Capability Framework 2020-2025⁹ is an excellent example of how cultural safety training can be supported across the workforce.

We draw your attention to the definition of cultural safety as contained in the National Agreement:

*Cultural safety is about overcoming the power imbalances of places, people and policies that occur between the majority non-Indigenous position and the minority Aboriginal and Torres Strait Islander person so that there is no assault, challenge or denial of the Aboriginal and Torres Strait Islander person's identity, of who they are and what they need. Cultural safety is met through actions from the majority position which recognise, respect, and nurture the unique cultural identity of Aboriginal and Torres Strait Islander people. Only the Aboriginal and Torres Strait Islander person who is recipient of a service or interaction can determine whether it is culturally safe.*¹⁰

Cultural competence for Aboriginal and Torres Strait Islander people looks different in different communities, but critical to the definition above is the understanding that *only the person who is recipient of a service or interaction can determine whether it is culturally safe*.

This means, the list of activities or actions a university has undertaken to improve cultural safety does not determine whether cultural safety has been achieved for students and staff, neither does data on retention, attrition etc.¹¹ These data may provide supporting information, but only qualitative feedback from Aboriginal and Torres Strait Islander students and staff will demonstrate whether an institution is culturally safe. This requires universities to ask Aboriginal and Torres Strait Islander students and staff whether they feel culturally safe in their learning/work environment. How this is best done should be determined in partnership with the Aboriginal and Torres Strait Islander community the University is working with.

A focus on cultural safety across all of the amendments, and the resulting reforms across the university sector is essential. Group of Eight universities have recently noted their commitment to

⁸ First Nations students need culturally safe spaces at their universities, The Conversation, 4 February 2022, <https://theconversation.com/first-nations-students-need-culturally-safe-spaces-at-their-universities-175521>.

⁹ University of Newcastle, Cultural knowledge and understanding: Building a culturally responsive environment, <https://www.newcastle.edu.au/our-uni/indigenous-collaboration/fostering-cultural-competency>.

¹⁰ National Agreement on Closing the Gap, Definitions, <https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/12-definitions>.

¹¹ Universities Australia, Indigenous Strategy annual report, May 2022 https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/08/UA_Indigenous_Strategy_Annual_Report_May-2022.pdf.

undertaking significant work that aligns with the Governments anti-racism standard.¹² This commitment needs to be universal across all universities, and through formal arrangements such as funding contracts.

NACCHO recommends funding agreements with universities include a formal commitment to cultural safety and anti-racism.

Managed Growth Funding System

Through the Managed Growth Funding System, the Government will “determine a maximum system-wide pool of places that is large enough to meet expected student demand and put the system on track to meet the attainment target.”¹³ This will be carried out through the setting of enrolment targets for each university. Universities that exceed their target will not receive Commonwealth Grant Scheme or student contributions for students above the target. There will be agreed performance outcomes, such as increasing enrolments from students from historically under-represented backgrounds.

Enrolments vs completions

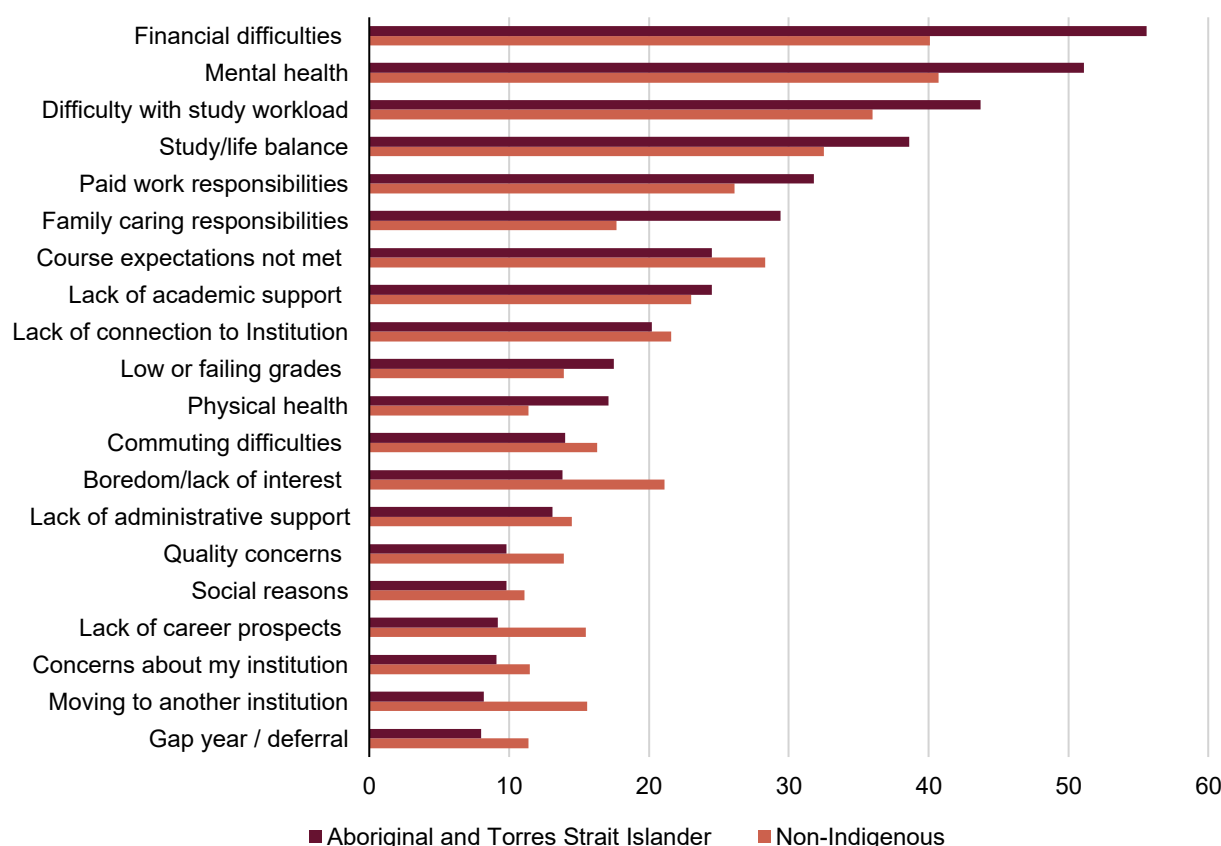
Not all students who enrol in higher education end up completing their studies. Figure 1 above shows that the number of Aboriginal and Torres Strait Islander students commencing their higher education has been steadily increasing over time. However, 4-year completion rates remain steady at around 28% of Aboriginal and Torres Strait Islander students.

Early departure from studies can happen for a variety of reasons. Figure 2 below shows that, among surveyed Aboriginal and Torres Strait Islander students considering early departure, top issues include financial difficulties, mental health, difficulty with study workload and study/life balance. There are noticeable differences between factors affecting Aboriginal and Torres Strait Islander students and non-Indigenous students.

¹² Group of Eight Australia, Media release: Go8 supports stronger university governance and action against racism, July 2026, <https://go8.edu.au/media-release-go8-supports-stronger-university-governance-and-action-against-racism>.

¹³ Department of Education, Budget 2024-25: Managed growth funding for universities, <https://www.education.gov.au/download/18186/2024-25-budget-managed-growth-funding-universities-fact-sheet/37332/document/pdf>.

Figure 2: Reasons for considering early departure from current institution among undergraduate students who considered leaving, by Indigenous status, 2024



Note: Figure made by NACCHO based on results of Quality Indicators for Learning and Teaching's Student Experience Survey.¹⁴

It is important to consider the flow-on impacts of early departure on students. University degrees are more expensive than ever.¹⁵ Students who depart their studies early, who are already more likely to be from historically under-represented backgrounds,¹⁶ are still responsible for HECS-HELP loans for their unfinished degrees. Sometimes this is in addition to personal loans used to pay for accommodation and other essential living expenses while studying. However, without completing their qualification, early departed students often see little of the workforce opportunities that benefit university graduates. As such, their time at university can leave them disillusioned and financially worse off.

The Managed Growth Funding System aims to deliver “a better and fairer education system for all Australians.”¹⁷ A focus on increasing student completions rather than enrolments would deliver better results for students, through encouraging effective student support and preventing early departure.

¹⁴ Quality Indicators for Learning and Teaching, Student Experience Survey 2024 Results, <https://www.qilt.edu.au/surveys/Data-Visualisation/ses>.

¹⁵ Manfield, E., ‘Failed’ university scheme hurting home ownership prospects, ABC News, July 2026, <https://www.abc.net.au/news/2026-07-18/job-ready-graduates-university-students-arts-degrees/106928300>.

¹⁶ Department of Education, Demand-driven Needs-based Funding, May 2026, <https://www.education.gov.au/australian-universities-accord/accord-202425-budget-and-myefo-measures/demanddriven-needsbased-funding>.

¹⁷ Department of Education, Budget 2024-25: Managed growth funding for universities, <https://www.education.gov.au/download/18186/2024-25-budget-managed-growth-funding-universities-fact-sheet/37332/document/pdf>.

NACCHO recommends Managed Growth Funding performance indicators are based on student completions rather than student enrolments to incentivise student retention.

Vocational Education and Training/higher education pathways

As part of the Universities Accord amendments, Government is also investing \$350.3 million to implement FEE-FREE Uni Ready courses, to help students who do not qualify for direct entry to university a cost-free opportunity to gain the skills they need.¹⁸ This is welcome, however Vocational Education and Training (VET) to higher education pathways require further investment.

Health qualifications and careers span both the VET and higher education sectors and are therefore ideal for the creation of more integrated pathways. Nationally consistent pathway articulation from VET into higher education starting at Cert IV level are needed. A literature review described VET to higher education pathways as convoluted – “it is critical to streamline those in order to increase Indigenous [higher education] participation.”¹⁹

VET is still perceived by some as lesser than higher education, yet it offers valuable and rewarding pathways and career options, particularly in the health sector. Currently, just 1.6% of registered nurses in Australia identify as Aboriginal or Torres Strait Islander, and of more than 124,000 Medical Practitioners, only 797 are Aboriginal and Torres Strait Islander – around 0.6%.²⁰ Stronger pathways from VET qualifications into higher education are required if we are to increase the number of Aboriginal and Torres Strait Islander remote area nurses, registered nurses, General Practitioners and allied health staff across the ACCHO sector.

There is currently work underway to develop a pathway for Aboriginal Health Practitioners (AHPs) to nursing. ACCHOs have a genuine interest in supporting senior Aboriginal Health Worker (AHW) and AHP staff who wish to access higher education, to specialise or move into higher paid professional roles, including nursing and medicine, or expand into allied health, health promotion or management.

To ensure work ready graduates, teaching must encompass strong industry pathways and incorporate on the job supervision and training. Upskilling in higher education health qualifications must be done in genuine partnership with the ACCHO sector. For example, in the health sector, there is a heavy focus on theory in professions such as nursing and allied health where practical skills are critical. Inadequate, unsupported and culturally unsafe placement structures do not help rectify this balance. For the ACCHO sector, this means a lack of suitably skilled, work ready graduates delivering primary health care across remote, regional and urban settings.

NACCHO recommends prioritising the development of stronger pathways from VET qualifications into higher education for Aboriginal and Torres Strait Islander students.

Credit transfer and recognition of prior learning

If the Universities Accord wishes to increase the number of graduates, credit transfer and recognition of prior learning (RPL) need to be addressed. The higher education sector needs a stronger understanding of VET training packages and how to map units of competency and work experience

¹⁸ Department of Education, Budget 2024-25: Managed growth funding for universities, <https://www.education.gov.au/download/18186/2024-25-budget-managed-growth-funding-universities-fact-sheet/37332/document/pdf>.

¹⁹ Frawley, J., Smith, J. A., Gunstone, A., Pechenkina, E., Ludwig, W., & Stewart, A. (2017). Indigenous VET to Higher Education pathways and transitions: A literature review. Access: *Critical Explorations of Equity in Higher Education*, 4(1), 34–54, <https://nvaos.newcastle.edu.au/ceehe/index.php/iswp/article/view/45>.

²⁰ Data provided to NACCHO from Australian Institute of Health and Welfare (AIHW), 2023.

for credit transfer at the university level. More streamlined credit transfer and recognition of prior learning (RPL) processes are key to this.

There is also opportunity to expand pathways through coordinating university qualifications with related VET training locations. For example, the Kimberley Aboriginal Medical Services' Registered Training Organisation in Broome offers AHW and AHP qualifications. Despite having state of the art medical training facilities in Broome,²¹ opportunities for Aboriginal Health Practitioners to advance into nursing remain limited, with no pathway that appropriately recognises their existing qualifications, knowledge, and practical experience.

Needs-based Funding to support students

The Bill's Needs-based Funding is meant to provide funding to support students from low socioeconomic backgrounds, Aboriginal and Torres Strait Islander students, and students studying at regional campuses. This funding will be directed towards students most in need of additional support, but wrap around services will be open to all students in need of support.²²

In principle, Needs-based Funding provides an opportunity to better support students. However, the lack of detail regarding quantum of funding and distribution is concerning. Although assisting regional campuses is mentioned, it is unclear whether support payments will increase with increasing remoteness. Additionally, there is no mention of intersectionality. Latest data on Aboriginal and Torres Strait Islander students attending higher education shows that in 2024, 43.6% were from regional and remote areas, 36.1% were from an area labelled as low socio-economic status, and 20.4% were living with disability.²³ This directly affects their support requirements.

NACCHO's concern is how that funding is allocated: infrastructure does not constitute structural change. Infrastructural investments are politically popular as they can provide a good news story, however simply building a facility for Aboriginal and Torres Strait Islander students will not deliver a long-term culturally safe learning environment for them.

In order to adequately support Aboriginal and Torres Strait Islander students to be successful in higher education, incentives such as scholarships and access to culturally safe support services including mentoring, and tutoring is required. In order to ensure they are culturally safe and appropriate, these supports are best delivered by Aboriginal and Torres Strait Islander people. In the VET sector, Aboriginal and Torres Strait Islander Community-Controlled Registered Training Organisations provide a gold standard example of culturally safe, wrap around student support.

Case study: Aboriginal Community-Controlled Registered Training Organisations

Aboriginal Community-Controlled Registered Training Organisations (ACCRTOs) play a vital role in delivering culturally safe, community-led education and training, across a number of sectors (from health to retail and hospitality to the creative arts). They are uniquely positioned to respond to the needs of Aboriginal and Torres Strait Islander learners by embedding Aboriginal and Torres Strait Islander knowledge systems, local languages, community priorities into vocational pathways and providing essential wrap around supports

ACCRTOs are critical enablers of regional workforce development and educational pathways. They provide a diversity of both accredited and non-accredited training to ACCHOs and their

²¹ Notre Dame University Australia, Pathways to Doctor of Medicine: Kimberley Centre for Remote Medical Training, <https://www.notredame.edu.au/forms/admissions/kcrmt-application>.

²² Department of Education, Demand-driven Needs-based Funding, May 2026, <https://www.education.gov.au/australian-universities-accord/accord-202425-budget-and-myefo-measures/demanddriven-needsbased-funding>.

²³ Department of Education, Key findings from the 2024 Higher Education Student Statistics, February 2026, <https://www.education.gov.au/higher-education-statistics/student-data/selected-higher-education-statistics-2024-student-data/key-findings-2024-higher-education-student-statistics>.

wider communities to build a skilled Aboriginal and Torres Strait Islander workforce. Central to this is a model of delivery that embeds high levels of holistic, wrap around supports, including:

- continued genuine supervision and mentoring,
- tutoring both on the job and as part of the training, including language, literacy, numeracy and digital support,
- delivery of block training and project-based knowledge and skill assessments,
- wrap around supports that consider everything from students' lived experiences (including negative relationships with education and early school leavers), home/personal situations, family commitments such as childcare needs, and cultural commitments such as Sorry Business and community responsibilities
- travel and accommodation needs.

This approach has been shown as essential to improve course completion rates.²⁴

It is important to tailor supports to students' needs. Figure 2 above shows that Aboriginal and Torres Strait Islander students who are considering early departure are doing so because of financial difficulties, mental health, difficulty with study workload and study/life balance. A much higher proportion of Aboriginal and Torres Strait Islander students also cite family caring responsibilities than non-Indigenous students. Supports specifically addressing these barriers, such as Aboriginal and Torres Strait Islander-specific mental health support and childcare on campus, are critical. However, these needs may vary across different campuses.

There is opportunity to deliver these services in partnership with local Aboriginal and Torres Strait Islander community-controlled organisations specialising in, for example, health and early childhood.

NACCHO recommends more transparency around the algorithm for determining Needs-based Funding.

NACCHO recommends a proportion of Needs-based Funding is directed towards Aboriginal and Torres Strait Islander specific students supports, delivered in partnership with local Aboriginal and Torres Strait Islander community-controlled organisations.

Supportive learning environments

Cultural safety is key to creating supportive learning environments for Aboriginal and Torres Strait Islander students. The need to offer additional support to students at key transition points is well-established.

Research by Gwynne et al shows strong evidence that the provision of wrap-around supports result in better completion rates for Aboriginal and Torres Strait Islander students in the VET context.²⁵ This research sought to validate identified enablers from preregistration tertiary nursing students to the VET context. The research validated the five previously identified enablers, and identified a further two:

1 Student motivation to undertake and complete study

²⁴ Gwynne, K., Rojas, J., Hines, M., Bulkeley, K., Irving, M., McCowen, D., Lincoln, M., Customised approaches to vocational education can dramatically improve completion rates of Australian Aboriginal students. Aust Health Rev. 2020 Feb;44(1):7-14. doi: 10.1071/AH18051. PMID: 30867086.

²⁵ Gwynne, K., Rojas, J., Hines, M., Bulkeley, K., Irving, M., McCowen, D., Lincoln, M., Customised approaches to vocational education can dramatically improve completion rates of Australian Aboriginal students. Aust Health Rev. 2020 Feb;44(1):7-14. doi: 10.1071/AH18051. PMID: 30867086

- 2 Teachers' understanding of Aboriginal cultures and their ability to translate this into their teaching methods
- 3 Students' sense of connection to other people, including students, support staff and teachers, and belonging to the training place
- 4 Strong commitment by the institution to encouraging Aboriginal students to enrol and complete their studies
- 5 Support of the family of the student undertaking study and the family seeking to understand the associated challenges
- 6 NEW – support of the student's employer to release them to undertake study
- 7 NEW – continuous improvement - listening to feedback and making improvements

Focussing on these enablers delivered a completion rate of 30 of 31 students (96.8%). Such approaches would be well considered in the higher education context. The Universities Australia Indigenous Strategy offers another excellent example – Macquarie University engage new Aboriginal and Torres Strait Islander students in a cultural camp to build a sense of community, offer cultural support and mentoring and practical workshops and support. The creation of a supportive learning environment, and support for new students at this key transition point has been shown to lead to better retention and outcomes.²⁶

In order to adequately support Aboriginal and Torres Strait Islander students to be successful in higher education, incentives such as scholarships and access to culturally safe support services such as mentoring, and tutoring is required.

NACCHO recommends Needs-based Funding is used to provide additional scholarships for Aboriginal and Torres Strait Islander students and culturally safe support services such as mentoring and tutoring.

Teaching practice

New ways of delivering course work must also be considered to meet the learning needs of Aboriginal and Torres Strait Islander students, including genuine and well-funded mentoring and tutoring programs. The examples outlined above amply demonstrate the value of such investment.

However, this also extends to genuine inclusion of pedagogical teaching approaches adopted in higher education and the implementation of core adult learning principles. The exclusion or devaluation of Indigenous pedagogies can create a barrier to academic success for Aboriginal and Torres Strait Islander students, limit a genuine understanding of Indigenous culture and history for all students, and prevent people from learning how to exercise highly valuable and useful modes of thought which could potentially address many problems in contemporary society.²⁷

Key limitations include the siloed and competitive nature of higher education and the funding models that have entrenched this; a lack of innovation and ability to flexibly adapt to the rapid changes currently occurring across society. It will be essential for the university sector to fundamentally shift traditional teaching practice and course structures.

In the VET sector, those teaching must hold a Certificate IV in Training and Assessment. University lecturers and tutors should also be trained in adult learning principles and facilitation, as well as

²⁶ Universities Australia, Indigenous Strategy annual report, May 2022 https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/08/UA_Indigenous_Strategy_Annual_Report_May-2022.pdf.

²⁷ Antoine, A., Mason, R., Mason, R., Palahicky, S., and Rodriguez de France, C., Pulling Together: A Guide for Curriculum Developers, Section 2: Meaningful Integration of Indigenous Epistemologies and Pedagogies, 2018, <https://opentextbc.ca/indigenizationcurriculumdevelopers/chapter/topic-indigenous-epistemologies-and-pedagogies/>.

cultural safety. Similarly, academic staff who are supervising research students, should be appropriately skilled to do so. Teaching, facilitation and supervision are specialised skills, and it can no longer be assumed that content expertise makes academic staff competent to teach. Further, there is a dearth of integrated training in Aboriginal and Torres Strait Islander cultures and a focus on ensuring lecturers have a strong understanding of Aboriginal and Torres Strait Islander peoples and their educational practices.

On-the-job training helps ensure students are job ready, however, supervised hospital placements for example, are rarely culturally safe for Aboriginal and Torres Strait Islander students – this needs to be rectified. The systemic racism within these structures must be addressed as many Aboriginal and Torres Strait Islander people feel culturally unsafe when undertaking placement arrangements and work-integrated learning. Supported placements in partnership with the ACCHO sector must be designed and developed to ensure culturally safe training options in primary health care for Aboriginal and Torres Strait Islander students.

For genuine partnerships to evolve, investment and training is required to ensure employers can adequately supervise students in the workplace. In order to incentivise employers to participate in placements, funding to backfill supervisory positions (to ensure service delivery is not compromised) is required as well as resources for employers that are tailored to meet their needs. Re-designing courses to deliver skill-set clusters that act as building blocks for the student and employer creates additional pathways for students and acknowledges for many, life commitments require them to work whilst studying. Using the principles and structures of the NACCHO VET traineeship/apprenticeship framework²⁸ in the higher education sector should be considered for Aboriginal and Torres Strait Islander students within the health sector.

NACCHO recommends mandatory training for lecturers and other academic staff at universities, covering cultural safety, adult learning principles, facilitation and supervision.

Living expenses

Student support payments such as ABSTUDY assist with living expenses. However, with undergraduate fortnightly payments capped at \$866.00 (for students living independently with no partner and a dependent child),²⁹ they are simply not enough. Although ABSTUDY can be combined with Rent Assistance payments, the maximum fortnightly Rent Assistance payment is \$291.48 (for a single person with 3 or more children). These combined payments, even based on these maximum amounts, would still place a person below the poverty line. Additionally, many Aboriginal and Torres Strait Islander people have community caring responsibilities outside of their own biological children. Kinship responsibilities are not factored into government payments.

Many students have to work casually while completing their studies, increasing their risk of burn out. Financial stress is also compounded by unpaid placements, for those studying degrees that require them. One-off payments such as the ABSTUDY Incidentals Allowance³⁰ can assist with covering some additional costs. However, textbooks, specialised gear such as lab equipment, mandatory student services and amenities fees and other ad-hoc costs are simply out of budget for some students.

²⁸ NACCHO, Aboriginal & Torres Strait Islander Health and Care Traineeship Framework, 2024, <https://www.naccho.org.au/wp-content/uploads/2024/11/FNHWTP-Traineeship-Framework-March-2024.pdf>

²⁹ Services Australia, ABSTUDY Living Allowance: Maximum rates for independent students and Australian Apprentices, March 2026, <https://www.servicesaustralia.gov.au/abstudy-living-allowance-maximum-rates-for-independent-students-and-australian-apprentices?context=45541>.

³⁰ Services Australia, ABSTUDY Incidentals Allowance, January 2026, <https://www.servicesaustralia.gov.au/how-much-abstudy-incidentals-allowance-you-can-get?context=39366>.

NACCHO recommends Needs-based Funding is used to provide affordable accommodation for Aboriginal and Torres Strait Islander student near campuses – including accommodation suitable for families.

NACCHO recommends a national program for Aboriginal and Torres Strait Islander students to access free or heavily subsidised textbooks, lab equipment and other specialised gear.

Allocating Commonwealth-supported places

Explanatory documents suggest that, as part of the Universities Accord, Commonwealth Supported Places will also be awarded to TAFEs and other non-university providers.³¹ It is important that these places are also provided to ACCRTOs.

NACCHO recommends ensuring Commonwealth-supported places are made available to ACCRTOs across all jurisdictions.

Skills shortage

Across Australia there is a critical shortage of doctors, nurses, and Aboriginal Health Workers and Health Practitioners. Shortages across all levels of the allied health workforce have also become critical as community-controlled health services expand into disability, aged care, social and emotional wellbeing and mental health.

The Aboriginal and Torres Strait Islander population is rapidly growing, and is expected to reach 1,180,000 by 2031 – a 46% increase from 806,000 in 2011.³² While the Aboriginal and Torres Strait Islander population is younger than the non-Indigenous population, by 2031 there will be 226,000 Aboriginal and Torres Strait Islander people aged 50 and over. The health workforce will have to expand in order to account for the expected growth in population and burgeoning needs of older Aboriginal and Torres Strait Islander people. As a sector, we are facing severe workforce challenges that are impacting access to health care, and which risk unravelling the hard-earned life expectancy gains the ACCHO sector has made for Aboriginal and Torres Strait Islander people.

In line with the recommendations of the *Aboriginal and Torres Strait Islander Health Plan 2021-2031* and the *National Aboriginal and Torres Strait Islander Health Workforce Framework and Implementation Plan 2021-2031*, the need to increase the proportion of Aboriginal and Torres Strait Islander people in the health workforce should be identified.

There is a need to leverage the current ACCHO workforce and draw from local communities to build a strong workforce that includes both cultural and clinical experts. Up-skilling, re-training, utilising the existing workforce and creating strong VET and higher education pathways to build capacity is key. Universities need to work closely with our sector to ensure there are genuine and supported pathways.

NACCHO recommends degrees in priority skills, such as nursing and allied health, are further incentivised in order to build the workforce.

³¹ Department of Education, Managed Growth Funding, December 2024, <https://www.education.gov.au/australian-universities-accord/accord-202425-budget-and-myefo-measures/managed-growth-funding>.

³² Australian Bureau of Statistics, Estimates and Projections, Australian Aboriginal and Torres Strait Islander Population: Data downloads, July 2024, [Estimates and projections. Australian Aboriginal and Torres Strait Islander population, 2011 to 2031](#).