

30 June 2016

VET FEE-HELP Redesign Team
Department of Education and Training
VFHPolicyRedesign@education.gov.au

To whom it may concern,

Re: Redesigning VET FEE-HELP Discussion Paper

The Congress of Aboriginal and Torres Strait Islander Nurses and Midwives (CATSINaM) wishes to make the following comments to the redesigning VET FEE-HELP Discussion Paper.

CATSINaM was founded in 1997 and is the national peak body that represents, advocates for, and supports Aboriginal and Torres Strait Islander nurses and midwives at a national level. We are a membership-based organisation and are governed by a nationally elected Aboriginal and Torres Strait Islander Board. We believe that nurses and midwives are the backbone of the Australian health system and play a pivotal role in providing culturally safe health services to Aboriginal and Torres Strait Islander communities. As nurses and midwives often work in frontline positions, their capacity to do this effectively is critical.

A strategic direction for CATSINaM is to strengthen our effectiveness in supporting the recruitment and retention of Aboriginal and Torres Strait Islander peoples in nursing and midwifery. This contributes to the well-recognised and broader need for Australia to improve recruitment and retention of nursing and midwifery students and employees in order to meet the health care needs of the future.

CATSINaM is committed to working with key stakeholders to ensure a seamless transition for Aboriginal and Torres Strait Islander students through secondary and tertiary (vocational and/or university) education to employment in the health system.

For many Aboriginal and Torres Strait Islander people VET is a more accessible higher education option than university and there is a high level of engagement with the VET sector with Aboriginal and Torres Strait Islander students making up 4.6 per cent of the total national VET student population in 2012. Meaningful participation of Aboriginal and Torres Strait Islander people in the VET sector has the potential to contribute to greater:

Unity and Strength through Caring

- educational parity through completion of Year 12 or equivalent qualifications
- employment participation through creation of job skills
- participation in the higher education sector by creating a bridge into undergraduate and higher awards.

However, these are outcomes reliant on the completion of quality education and training courses that are part of meaningful higher education and employment pathways.

Currently Aboriginal and Torres Strait Islander participation in the VET sector is marked by low levels of completion, multiple enrolments and lack of transition into the workforce or higher-level education qualifications. While VET participation rates are higher for Aboriginal and Torres Strait Islander people in 2011 only 23 per cent of qualifications enrolled in are completed and 50 per cent of qualifications completed are low-level (Certificates I and II).

Cultural safety

CATSINaM considers that a lack of cultural safety and institutional racism are barriers to the recruitment and retention of Aboriginal and Torres Strait Islander students and graduate nurses and midwives.

Cultural safety is viewed by CATSINaM as the final step on a continuum of nursing and/or midwifery care that includes cultural awareness, cultural sensitivity, cultural knowledge, cultural respect and cultural competence. CATSINaM advocates on behalf of Aboriginal and Torres Strait Islander peoples by promoting a framework of cultural safety to inform attitudes and behaviours in the health professions, this includes in the education and training of Aboriginal and Torres Strait Islander health professionals. To achieve this state, cultural safety must be embedded in every aspect of education and training for health professionals.

Protecting students

Student eligibility

It is CATSINaM's position that implementing further student eligibility requirements risks being an impediment to accessibility for already disadvantaged groups such as Aboriginal and Torres Strait Islander people, who already face cultural and language barriers in the recognition of their prior learning and literacy and numeracy skills. The onus of responsibility should be placed on provider behaviour through greater regulation by government.

Regulating fees and capping loan amounts.

The high level of enrolment by Aboriginal and Torres Strait Islander people in VET courses puts them at particular risk of accumulating large HECS FEE-HELP debts. The Forrest Review described Aboriginal and Torres Strait Islander participation in the VET sector as a pattern of ‘training for trainings sake’¹, the Australian Government’s discussion paper identifies contributing factors such as unscrupulous providers, fee inflation and mutual obligation requirements tied to welfare payments. While Aboriginal and Torres Strait Islander people with Cert III level qualification or above are more likely to be employed, broadly speaking Aboriginal and Torres Strait Islander people are also more likely to be low-income earners. Regulating VET fee structures by both establishing and enforcing reasonable provider fees and capping of loan amounts would help ensure that Aboriginal and Torres Strait Islander people do not inadvertently accumulate large debts that would counter potential long term financial gain offered by further education.

It is CATSINaM’s recommendation that a reasonable cost be established as a basis to regulate both provider fees and maximum student loan amounts. Establishing reasonable costs should be done by modelling costs of training providers delivery outcomes in attraction and retention, completion and student progression into employment or higher education. Measures to implement culturally safety by providers should also be accounted for and success in these areas (attraction and retention, completion and pathways) must also account for engagement and completion of Aboriginal and Torres Strait Islander students. Modelling should also identify providers in a diversity of regions and mode of delivery to establish variances in cost of delivery relating to location and method. Once reasonable fees have been established through this process they could be used as a basis to inform a maximum loan amount given reasonable consideration to a pathway of education that a student with limited prior education qualifications may need to take.

While CATSINaM endorses fee regulation and loan capping as a consumer protection measure, this must be balanced by initiatives to ensure continuation of students using VET as a platform for further studies. This should include an increase in scholarships, expansion of the Indigenous Cadetship Program to incorporate Diploma level studies and improved systems and processes for VET credit transfers between providers.

¹ P.158-160. Forrest, A. *The Forrest Review: Creating Parity*. Commonwealth of Australia.

Targeted investment

Targeted investment in vocational areas such as health services (including nursing) could improve health and employment outcomes, reduce costs associated with the VET FEE-HELP system and provide a strong return on investment for the Commonwealth. Aboriginal and Torres Strait Islander health, education and employment are integrally connected. Investing in Aboriginal and Torres Strait Islander health professions results in higher quality health care and improved health outcomes for Aboriginal and Torres Strait Islander people. While improved education and employment levels through health services results in improved economic outcomes for the broader Aboriginal or Torres Strait Islander Community. As part of the Australian Government's commitment to closing the gap on the socio-economic disadvantage of Aboriginal and Torres Strait Islander people all programs must look at ways that they can contribute to this broader goal.

Nurses and midwives represent well over 50 per cent of the entire health workforce. Substantial national nursing workforce shortfalls of 28,000 nurses by 2018 are predicted, and over 100,000 nurses by 2030.² Building the nursing and midwifery sector is a critical priority for the Australian Government. In order for government to address this demand a coordinated approach across government programs, the profession and the tertiary sectors is required – of which targeting programs such as the VET FEE-HELP system towards industry demands such as this should be a critical component.

Within this shortfall there is an opportunity to make real gains in Aboriginal and Torres Strait Islander education, employment and health by the targeted recruitment of Aboriginal and Torres Strait Islander nurses and midwives to meet industry need. Aboriginal and Torres Strait Islander nurses and midwives currently make up a very small 1 per cent of all nurses and midwives. More than 6000 additional Aboriginal and Torres Strait Islander nurses are required to meet a 3 per cent population parity; however, disparities in health need support the need for Aboriginal and Torres Strait Islander nurses and midwives to represent over 5 per cent of the workforce.³

² p.26 Alford K, 2015, *A cost-effective approach to closing the gap in health, education an employment: investing in Aboriginal and Torres Strait Islander nursing education, training and employment*, CATSINaM, Canberra.

³ p.33-36 *ibid*

Pathways from school, VET, higher education to employment are a critical component of increasing Aboriginal and Torres Strait Islander nurses and midwives, and better targeting of the VET FEE-HELP system should be a component of this. However, targeting of the VET FEE-HELP system alone will not address the issues of non-completion of courses by Aboriginal and Torres Strait Islander and issues of cultural safety in the classroom (including curricula) must be addressed. This should include development of a cultural safety framework for providers delivering health services courses in the VET sector and investment in both Aboriginal and Torres Strait Islander training packages and Aboriginal and Torres Strait Islander providers as part of a coordinated government approach to training.

Improving student information and assisting students to make the right choice?

Currently career pathways are limited and lack visibility, a national approach to culturally safe specialised support including mentoring, counselling and academic support is needed to ensure Aboriginal and Torres Strait Islander student engagement and success. Access by Aboriginal and Torres Strait Islander mature aged students is marred by lack of community engagement, appropriate cultural support, lack of flexibility in learning approaches and lack of recognition or prior learning and knowledge. Culturally grounded mentoring and career development programs for Aboriginal and Torres Strait Islander people are critical for informing choice.

There is also an active need to actively promote health careers on an ongoing basis to primary and secondary students, as there is limited awareness of the benefits, diverse range of work and pathways for entry into health professions. Aboriginal and Torres Strait Islander young people are less knowledgeable about possible careers than non-Indigenous youth, and are more likely to pursue a health career if their school actively promotes health as a career option. Ad-hoc approaches to funding by the Australian Government has seen the cessation of successful career development programs such as Murra Mullangari aimed at retaining secondary students and creating pathways into employment within the health professions⁴.

⁴ p.5 Close the Gap Steering Committee 'Submission to the Indigenous Jobs and Training Review' 2013.

Regulating providers

Should higher quality standards be applied to RTOs seeking to provide VET FEE-HELP?

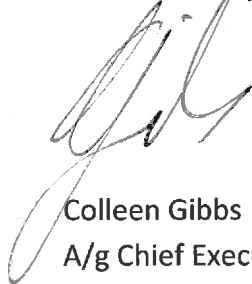
Yes, given the particular vulnerabilities of Aboriginal and Torres Strait Islander students to VET sector providers indicated through the proportionately high level of Aboriginal and Torres Strait Islander student enrolment in the VET sector, the comparatively low-level of completion and the high level of VET FEE-HELP debt accumulated. Consequently, cultural safety standards should form an integral component of quality standards applying to RTOs seeking to provide VET FEE-HELP assistance.

Further information

For further information, we have attached the following CATSINaM documents relevant to your considerations:

- CATSINaM Economic Analysis Report - *A cost effective approach to closing the gap in health, education and employment: Investing in Aboriginal and Torres Strait Islander nursing education, training and employment.* Authored by Dr Katrina Alford.
- CATSINaM Position Statement Cultural Safety.
- CATSINaM Position Statement Recruitment and Retention.

Yours sincerely,



Colleen Gibbs
A/g Chief Executive Officer