National Aboriginal and Torres Strait Islander Postgraduates Association (NATSIPA)

Submission to Review of the Australian Qualifications Framework

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Compiled with the assistance of office bearers and members of the National Aboriginal and Torres Strait Islander Postgraduates Association (NATSIPA)

Prepared by Dr Sharlene Leroy-Dyer (Vice President) and Dr Sadie Heckenberg (2016-18 President), with the assistance of Gina Masterton (President) and Victoria Van Schie (NLO)
PO Box 3262, Glendalae NSW 2285
0417239909
www.natsipa.edu.a
Forward

NATSIPA is a national network of Aboriginal and/or Torres Strait Islander postgraduate students and non-Indigenous student supporters. Our goal is to ensure that Aboriginal and Torres Strait Islanders can access postgraduate education in a fair and equitable manner. We do this by working towards better support, greater funding, and improved opportunities for Aboriginal and Torres Strait Islanders in higher education.

NATSIPA’s activities include:
- Providing a national Aboriginal and/or Torres Strait Islander student voice to Federal and State Governments.
- Providing opportunities for Aboriginal and/or Torres Strait Islander postgraduate students to link-up, support each other, and share ideas.
- Advising universities on how to best support Aboriginal and/or Torres Strait Islander students.
- Disseminating information to NIPAAC members, such as scholarship offers, upcoming events and relevant news.
- Assisting Aboriginal and/or Torres Strait Islander students if they are experiencing problems at university.
- Advise CAPA on all Aboriginal and Torres Strait Islander protocols and issues.

NATSIPA’s AIMS are:
To ensure that Aboriginal and Torres Strait Islander Australians can access postgraduate education in a fair and equitable manner.

NATSIPA’s VISION Statement:
To ensure that Aboriginal and Torres Strait Islander Australians can access postgraduate education in a fair and equitable manner. This is achieved by valuing Aboriginal and Torres Strait Islanders diverse cultures and histories, supporting their control over their own and their family’s education. NATSIPA will strive to create a comprehensive program to increase public awareness and commitment to partnerships that restore and retain Indigenous spirituality, cultures and languages, social systems, economic systems and self-determination.
To also provide strategic advice to the Australian Government that:
- is focused on achieving equal educational outcomes for Aboriginal and Torres Strait Islander Australians;
- supports the partnership that drives the achievement of commitments made to close the gap on Indigenous disadvantage;
- is focused on promoting accountabilities;
- promotes excellence and innovation;
- is proactive and strategic;
- is given with honesty, respect and integrity.

Guiding Principles:
- Leadership: We will provide leadership to advance Aboriginal and Torres Strait Islander postgraduate involvement in Higher Education.
- Collaboration: We will seek opportunities for collaboration and shared leadership with individuals and organizations that share our vision and core values.
• **Integrity:** All of our actions will be conducted in accordance to the strict adherence to the highest standards of conduct.

• **Diversity and Respect:** We embrace diversity in all aspects of our organization, from the people with whom we work, collaborate, and serve, to the ideas and solutions we develop in support of our vision. We are committed to providing an environment in which people; their cultures, their ideas, their beliefs and their opinions are respected.

**Goals:**
- Engage the Aboriginal and Torres Strait Islanders in postgraduate studies.
- Implement and evaluate effective strategies to increase Aboriginal and Torres Strait Islander participation in Higher Education.
- Evaluate and expand Aboriginal and Torres Strait Islander postgraduate support as a means of sustaining Aboriginal and Torres Strait Islander Postgraduate student engagement within the sector.

**Objectives:**
The objectives of NATSIPA are as follows:

a) To provide a network for Indigenous postgraduate students;

b) To act as advocate for and to represent the interests of Indigenous postgraduate students at a National level;

c) To promote reconciliation between non-Indigenous and Indigenous Peoples of Australia;

d) To promote research into Indigenous issues and the training of Indigenous researchers;

e) To educate researchers on appropriate protocols when dealing with issues of cultural and social significance to Indigenous Peoples;

f) To liaise with universities, governments and other national associations with a view to promoting these objectives;

g) To promote the participation by Indigenous Peoples as equals in a national community of postgraduate scholarship; and

h) To be a constituent organisation of the Council of Australian Postgraduate Associations (CAPA) and to adhere to the rules of CAPA and to resolutions of its Council and Executive.
1. In what ways is the AQF fit, or not fit, for purpose?

NATSIPA believes that the Australian Qualifications Framework (AQF) is fit for purpose and provides an important regulatory service within the Higher Education sector. We believe that the AQF has an important role to play in ensuring minimum durations and outcomes of tertiary courses, thereby ensuring the quality and value of these qualifications.

NATSIPA believes that there is scope for some clarification, modifications and enhancements and these will be outlined in the sections below.

2. Where the AQF is not fit for purpose, what reforms should be made to it and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in the discussion paper and other approaches.

The following detail is provided and structured around the main topics included in the report:

A wider range of credentials could be included in the AQF

The AQF is used by a wide range of agencies, not all of which are familiar with its application. For example, some accrediting bodies use the AQF during accreditation processes. Being mindful of the range of audiences that use the AQF, it is crucial that its structure and language is clear and unambiguous. Indeed this ambiguity can extend from Higher Education provider governance bodies to the staff creating curriculum and not understanding at what AQF their individual courses sit and how that should reflect within curriculum and assessment. NATSIPA’s believes that the addition of more qualification types and detail to the framework will make the AQF to complex, and lead to more confusion.

Of particular interest to NATSIPA are the areas of Vocational Education and Training (VET) and Enabling as these are pathways commonly used by Aboriginal and Torres Strait Islander Students.

VET – Though VET programs are already aligned to AQF they can differ greatly in both practice and assessment. While one AQF level 5 course may offer a classes room based curriculum another may be more a more industry skill-based therefore less clearly aligned to the current framework. Both these pathways are very valuable to Aboriginal and Torres Strait Islander students, so it is important that neither are confused or devalued. With this in mind the AQF needs to clearly define the different qualification types and levels to ensure the value and differences between the qualification types are not confused.

NATSIPA strongly recommends that no student be devalued or Higher Education Provider underfounded when providing qualifications to their students. We maintain a strong position on quality for all students studying within Australia no matter their institution of study. NATSIPA recommends that if a level qualification is defined within the AQF, then the level of funding and resources should not differ between VET,
University or other Higher Education Providers. Indeed we recommend that Commonwealth Supported Places should be offered at the same rate per program as those offer at universities. Building on this Students Studying AQF level 5 and 6 courses should be intitiled to the same level of HECS-HELP and FEE-HELP loans no matter the institution. Many students are having to leave industry leading programs, set on making them trailblazers for their industry and communities, because HECS-HELP and FEE-HELP have either not been offered or only partically offered for their chosen program. More often than not these students are from Low SES backgrounds. No student should have to leave their program or institution because of out of pocket financial costs occurred from course or program fees.

NATSIPA recommends that Aboriginal and Torres Strait Islander Students, no matter the institution of study, need the same level of service and care. Indeed we would like to see a Indigenous Student Success Program (ISSP) like funding agreement be offered to wider range of Higher Education Providers. With a large Indigenous student cohort undertaking AQF level 5 and level 6 courses at non-universities providers these students, as well as their colleges studying other programs, deserve the same level of care and service as those students within our Australian universities.

Enabling – The addition of enabling education into the AQF has caused a great deal of discussion in the sector. NATSIPA has a vested interest in enabling programs as this is a vital pathway for Aboriginal and Torres Strait Islander students entering the university sector. It is also a vital pathway for thousands of mainstream students.

NATSIPA believes that aligning enabling education to the AQF would be detrimental to the student needs at this level. NATSIPA sees enabling education as a place where students gain the skills and confidence needed to succeed in higher education. It is more closely aligned to a school based qualification. Therefore we do no recommend that it is included in the AQF.

Enabling education in its current form has the flexibility to match educational and cultural needs of Aboriginal and Torres Strait Islander students and it is vital that this should remain in place. Enabling education needs to be a personalised experience that matches the needs of the student cohort.

NATSIPA is concerned that alignment to the AQF to level 5 or more will remove flexibility and reduce the value of what currently is an excellent preparation for Aboriginal and Torres Strait Islander students who need extra help to access degree level study. Enabling programs across the country already have embedded in them:

- academic rigour such that students can engage successfully with undergraduate programs;
- quality assurance procedures to ensure that students are provided with the programs, courses and support services that acknowledge the unique place enabling holds within the sector and the unique contexts of their students; and
- contextualised evaluation within a framework that ensures all providers of enabling education are connected to principles of best practice and continuous improvement so as to provide the highest quality of education to students.
Therefore, NATSIPA believes that incorporating enabling qualifications into the AQF is not the best way to achieve a contextualised rigorous approach to enabling education nationally given the diversity of programs and students involved. Rather, an alternative strategy: an enabling qualification framework (EQF) and enabling outcomes, could sit alongside the AQF.

There are a number of advantages to this approach including:

- demonstrated federal government commitments to equity principles and widening participation agendas. An EQF could embed an understanding of the special needs of many enabling students who fall within the six recognised equity categories, and indeed often experience compounding educational disadvantages, and the ongoing successes of enabling programs in widening participation nationally;
- a more nuanced approach to enabling programs, that takes into account the ways in which different programs have arisen to meet different student, institutional and local contexts. From a national perspective programs vary in scope duration, nature, purpose and type;
- Some are designed as units that sit alongside first year degree programs – (modules and online units specific to degree programs)
- Some are standalone programs varying in duration from 3 weeks to 2 years.
- Some are for a specific targeted cohort of students, for example programs for Aboriginal and Torres Strait Islander students only, mature aged students, recent school leavers, regional-remote students, incarcerated populations, non-ATAR schools.
- Differences between programs are necessary to address the needs of particular regions, the economies that operate within those regions and the particular experiences and disadvantages of the individuals and communities within those regions. They have also arisen to redress particular forms of disadvantage, and are reactive to emerging trends in higher education. An EQF would have greater capacity to reflect this nuance and ensure that rigour does not necessarily equate to a uniformity that stifles the core purpose of enabling education and the capacity of the sector to innovate into the future.
- An EQF could be developed in consultation with the National Association of Enabling Educators Australia (NAEEA), Universities with long standing and culturally appropriate enabling programs, and other stakeholders.

**Duration periods for a PhD:**

NATSIPA would like to see the AQF level 10 Volume of Learning increased to 4-5 years. This change would better reflect the realist timelines that are current PhD student completion rates. NATSIPA believes that an extended time line with the AQF for level 10 would allow for a greater awareness and acknowledgment by higher education providers of the unrealistic and harmful expectations put on students in order to finish within these timelines.

Indeed, NATSIPA believes all cohorts of students are adversely affected by these strict timelines. With the majority of students undertaking PhD without scholarships, students are often times greatly overworked in order to financially support themselves and
complete a PhD within the required time. This pressured is also placed on students who have obtained scholarships and are pressured to meet scholarship timelines.

This pressure is magnified for our Aboriginal and Torres Strait Islander cohort who bring cultural and family responsibilities with them to their higher education journeys. Aboriginal and Torres Strait Islander postgraduate students are more generally than not mature age students. Our student cohort may work full time and be from a Low SES background. Many of our students come from regional and remote areas of Australia and may still choose to study from those under resourced areas. Our students bring Cultural connections and responsibilities and many have a different level of financial and other obligations towards their extended family than their non-indigenous colleagues (Harrison, Trudgett, & Page, 2017 & Trudgett, Page, & Harrison, 2016).

Due to many students inability to complete their PhD student within the 3-4 year full time equivalent timeline more Universities are now introducing ‘fines’ or fee payments for students who exceed this timeline and full outside of the allowed ‘extension’ time periods. NATSIPA argues that if introducing these fees has become industry standard within the university sector, this is a clear indication that students are unable to realistically complete within this timelines, that universities are aware of this, and that they are now using this oversight within the AQF level 10 timeline as a way to generate revenue from students wanting to finish their degrees.

NATSIPA Recommends:

- That AQF levels be equally resourced and students provided the same level of care no matter the Higher Education provider.
- That Enabling Programs not be included in the AQF
- That if Enabling Programs are seen to be in need of more regulation at EQF is created.
- That the AQF level 10 Volume of Learning be increased to 4-5 years.

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.

Implementation will need to involve consultation with a range of stakeholders including regulatory and professional accreditation bodies. A transition plan will also need to be developed noting this will impact on admission and enrolment information for students, and strategies for institutions.

NATSIPA would like to to see university granted / federally funded Scholarships fall in line with realistic student completion timelines and be extended to 4 – 5 years for a PhD. NATSIPA would also like to express our concern regarding the lack of APA scholarships by Aboriginal and Torres Strait Islander students. We would like to see the APA and other federally funded scholarship brought into line with population parity to insure our students also are able to access this vital financial help during study. Furthermore we would suggest each university set aside at least one PhD scholarship, if not parity to their
student population, to allow Aboriginal and Torres Strait Islander student access to greater opportunities within their higher education providers.

We would also like to see the academic (Level A) positions created for research students to be extended to 4-5 years in line with student completion rates. These students face mounting pressure to complete within very strict timelines or face unemployment. Yet they must also perform as a successful high achieving academic in order to even be considered by the university to be employed beyond their initial appointment. The three year time period of these appointments to complete a PhD whilst undertaking teaching commitments is unrealistic and universities are setting up these staff members to fail. This especially affects Aboriginal and Torres Strait Islander peoples who are more mature age, have family commitments and cannot afford to be on Abstudy or a scholarship.

Other

NATSIPA wishes to thank the Expert Panel for the opportunity to comment on the Australian Qualifications Framework discussion paper. Our responses were compiled through extensive consultation with our members.

References
