



Australia's National Institute for Aboriginal
and Torres Strait Islander Health Research

Australian Apprenticeships Priority List

Submission to Department of Employment and Workplace Relations

Lowitja Institute, November 2025



Apprenticeships Legislation and Engagement Team
Apprenticeships Policy Branch | Apprenticeships and Digital Project
Division Department of Employment and Workplace Relations

November 2025

Dear Apprenticeships Legislation and Engagement Team,

Re: Consultation on the Australian Apprenticeships Priority List

Lowitja Institute welcomes the opportunity to respond to the Department of Employment and Workplace Relations' discussion paper on the Australian Apprenticeships Priority List (the Priority List).

Lowitja Institute is Australia's national institute for Aboriginal and Torres Strait Islander health research, named in honour of our co-patron, Dr Lowitja O'Donoghue AC CBE DSG. As the only Aboriginal community-controlled research Institute in Australia, we produce high-impact research, tools and resources that contribute to positive health outcomes for Aboriginal and Torres Strait Islander peoples. Our research is built on priorities that have been identified by Aboriginal and Torres Strait Islander peoples. We strongly support the inclusion of Aboriginal and Torres Strait Islander perspectives in the design and prioritisation of Australian Apprenticeships and recommend that the Priority List explicitly reflects the National Agreement on Closing the Gap, particularly its four Priority Reform Areas, along with the following research training priorities:

- Recognition of Aboriginal and Torres Strait Islander-led training and research pathways as areas of national importance;
- Targeted incentives and funding for Aboriginal and Torres Strait Islander community controlled Registered Training Organisations; and
- Investment in Aboriginal and Torres Strait Islander-led research and data systems to strengthen evidence-based policy and evaluation of apprenticeships and traineeships.

Our submission highlights the critical role of Aboriginal and Torres Strait Islander leadership in education, training, and workforce development, and the proven success of community controlled approaches in delivering culturally safe and effective outcomes.

We would welcome the opportunity to discuss these recommendations in further detail.

Warm regards,

Sonia Waters



Executive Manager, Workforce



Lowitja Institute

About Lowitja Institute

Lowitja Institute is a national Aboriginal and Torres Strait Islander Community Controlled Organisation working for the health and wellbeing of Aboriginal and Torres Strait Islander peoples through high-impact quality research, knowledge translation, and by supporting Aboriginal and Torres Strait Islander health researchers.

Established in January 2010, we operate on the key principles of Aboriginal and Torres Strait Islander leadership, a broader understanding of health that incorporates wellbeing, and the need for the work to have a clear and positive impact.

Lowitja Institute has a longstanding commitment to the *National Agreement on Closing the Gap*, as members of the Coalition of Peaks, National Indigenous Health Leadership Alliance and the Close the Gap Steering Committee, including authoring the Close the Gap Campaign Report over four of the past five years.

Lowitja Institute's research is built on priorities identified by Aboriginal and Torres Strait Islander peoples. We aim to produce high impact research, tools and resources that will have positive health outcomes for Aboriginal and Torres Strait Islander peoples. To guide this, we work by five principles that underpin our approach to research.

These principles are:

1. Beneficence, to act for the benefit of Aboriginal and Torres Strait Islander people in the conduct of our research.
2. Leadership by Aboriginal and Torres Strait Islander people
3. Engagement of research end users (Aboriginal and Torres Strait Islander organisations and communities, policymakers, other potential research users)
4. Development of the Aboriginal and Torres Strait Islander research workforce
5. Measurement of impact in improving Aboriginal and Torres Strait Islander people's health.

Based on this experience we offer the following recommendations.

Feedback on the Priority List

Key recommendations

Listed below are recommendations for consideration by the Department in finalising the Australian Apprenticeship Priority List. These recommendations are further contextualised throughout this submission.

Lowitja Institute recommends that:

1. The Australian Apprenticeships Priority List aligns with the National Agreement on Closing the Gap and its four Priority Reform Areas.
2. The Priority List include occupations and qualifications that support Closing the Gap outcomes, particularly those advancing Aboriginal and Torres Strait Islander health, research, and community wellbeing.
3. All Aboriginal and Torres Strait Islander-specific qualifications be recognised as traineeships and receive permanent inclusion on the Priority List, including the Certificate IV in Aboriginal and Torres Strait Islander Research Theory and Practice and the Certificate II in Community Health Research.
4. The Community Researcher occupation be added to the National Skills Classification (OSCA) list.
5. Funding and incentives to deliver apprenticeships and traineeships for Aboriginal and Torres Strait Islander people be directed to Aboriginal and Torres Strait Islander community controlled Registered Training Organisations.
6. Build the evidence base through Aboriginal and Torres Strait Islander-led research.

Align Apprenticeships Priority List with the National Agreement on Closing the Gap

The Priority List should recognise that apprenticeships and traineeships are critical to achieving Closing the Gap targets, and the alignment with the outcomes of the Closing the Gap Agreement presents a significant opportunity to advance economic participation and self-determination for Aboriginal and Torres Strait Islander peoples.

Aboriginal and Torres Strait Islander people are underrepresented in higher-level qualifications but are highly engaged in vocational education and training (VET) pathways. Apprenticeships and traineeships therefore play an essential role in building pathways into long-term, skilled employment and leadership positions - including within



health, research, education, and community services.¹ By prioritising qualifications that reflect the strengths, aspirations, and labour market opportunities for Aboriginal and Torres Strait Islander peoples, the Australian Apprenticeship Incentive Scheme can contribute directly to Outcome 7 (Aboriginal and Torres Strait Islander people have access to, and the capability to obtain, employment opportunities) and Outcome 8 (strong economic participation and development of Aboriginal and Torres Strait Islander people and communities) of the National Agreement.

The review of the Australian Apprenticeship Incentive Scheme also presents a meaningful opportunity to embed the priority reforms detailed with the National Agreement, into the development and regular review of the Priority List. Aligning the Priority List with the four Priority Reforms will strengthen the relevance and impact of the Priority List, while also ensuring investment in skills and training is responsive to the priorities of Aboriginal and Torres Strait Islander peoples and promotes culturally safe pathways into skilled employment.

This approach supports shared decision-making with Aboriginal Community Controlled Organisations (ACCOs) and aligns with the Priority Reforms of the National Agreement. In particular:

1. Priority Reform Two — Building the community controlled sector

Incentives should strengthen Aboriginal and Torres Strait Islander training organisations and the capacity of the community controlled sector to deliver high-quality, culturally safe training; and

2. Priority Reform Three — transforming Government Organisations

Priority funding should support cultural safety through the creation of environments that are aligned to our peoples' ways of being, knowing, and doing, and remove barriers to Aboriginal and Torres Strait Islander apprentices' success.

With this in mind, we make the following recommendations:

Recommendation 1: The Australian Apprenticeships Priority List aligns with the National Agreement on Closing the Gap and its four Priority Reform Areas.

Recommendation 2: The Priority List include occupations and qualifications that support Closing the Gap outcomes, particularly those advancing Aboriginal and Torres Strait Islander health, research, and community wellbeing.

¹ Bailey, J., Blignault, I., Carriage, C., Demasi, K., Joseph, T., Kelleher, K., Lew Fatt, E., Meyer, L., Naden, P., Nathan, S., Newman, J., Renata, P., Ridoutt, L., Stanford, D. & Williams, M, 2020. 'We Are working for our people': Growing and strengthening the Aboriginal and Torres Strait Islander health workforce, Career Pathways Project Report, The Lowitja Institute, Melbourne.

Growing the Aboriginal and Torres Strait Islander research workforce, through recognised traineeships

Lowitja Institute's 2019 report, *Further Strengthening Research Capabilities: A review and analysis of the Aboriginal and Torres Strait Islander Health Research Workforce*, identifies that research training pathways, which includes traineeships, are essential to developing and sustaining a strong Aboriginal and Torres Strait Islander research workforce.²

Growing and supporting the Aboriginal and Torres Strait Islander workforce is crucial to improving the health and wellbeing of Aboriginal and Torres Strait Islander peoples. It is an essential pathway in closing the gap in health, education, social and economic outcomes and in achieving equity and justice for Aboriginal and Torres Strait Islander peoples.

We recommend that the Priority List include research training and community research occupations as a national priority area. Research led by Aboriginal and Torres Strait Islander people is a well-established and vital contributor to improving health and wellbeing outcomes for our communities and closing the gap.³ Aboriginal and Torres Strait Islander people are leading high-quality, impactful research across disciplines - research that reflects our knowledges, values, and priorities, and generates evidence that benefits our communities.

Qualifications such as the Certificate IV in Aboriginal and Torres Strait Islander Research Theory and Practice, along with other Aboriginal and Torres Strait Islander-specific training pathways, play a critical role in supporting this leadership. Prioritising and strengthening access to these qualifications through the Australian Apprenticeships system will:

- Provide structured and culturally safe entry pathways for Aboriginal and Torres Strait Islander people into research and policy careers;
- Embed Aboriginal and Torres Strait Islander knowledges and methodologies in the national research system;
- Support the Closing the Gap health and education targets through culturally grounded research practice; and
- Build national capacity for Aboriginal and Torres Strait Islander-led innovation, evaluation, and community-centred evidence generation.

We also support the inclusion of other Aboriginal and Torres Strait Islander qualifications - such as those in community health, Indigenous environmental health, and cultural heritage management - as permanent fixtures on the Priority List.

² Ewen, S., Ryan, T. & Platania-Phung, C. 2019, *Further Strengthening Research Capabilities: A review and analysis of the Aboriginal and Torres Strait Islander health researcher workforce*, The Lowitja Institute, Melbourne.

³ Butler, T., Anderson, K., Black, O., Gall, A., Ngampromwongse, K., Murray, R., et al. (2025) *Co-design versus faux-design of Aboriginal and Torres Strait Islander health policy: a critical review*. Melbourne: Lowitja Institute.

We make the following recommendations for consideration:

Recommendation 3: All Aboriginal and Torres Strait Islander-specific qualifications be recognised as traineeships and receive permanent inclusion on the Priority List, including the Certificate IV in Aboriginal and Torres Strait Islander Research Theory and Practice and the Certificate II in Community Health Research.

Recommendation 4: The Community Researcher occupation be added to the National Skills Classification (OSCA) list.

Targeted investment in Aboriginal and Torres Strait Islander community controlled Registered Training Organisations

Aboriginal and Torres Strait Islander community controlled Registered Training Organisations (RTOs) are well-placed to deliver culturally safe education and support stronger outcomes for Aboriginal and Torres Strait Islander learners. When Aboriginal community controlled RTOs deliver education and training courses, Aboriginal and Torres Strait Islander people are more likely to remain engaged and complete the courses, when compared to public providers.⁴ This is because community controlled RTOs provide wrap around, culturally appropriate, and high quality education and training – which better meets the needs of Aboriginal and Torres Strait Islander people.⁵

The Priority List methodology and the Apprenticeships Incentive System should therefore ensure that incentives and funding prioritise Aboriginal and Torres Strait Islander RTOs.

Supporting the community controlled sector, through sustainable funding and appropriate resourcing, brings the Apprenticeship Priority list in alignment with Priority Reform 2, Building the community controlled sector, of the National Agreement - and will help strengthen local economies, support self-determination, and improve retention and completion outcomes.⁶

Additionally, investment in place-based and remote delivery models is critical to ensuring Aboriginal and Torres Strait Islander people can access apprenticeships close to home, with culturally safe mentorship and community support structures.

We make the following recommendation for consideration:

Recommendation 5: Fund the community controlled sector to deliver high quality, culturally appropriate education and training.

⁴ Department of Jobs, Skills, Industry & Regions (Victoria) (2024). *Victorian Jurisdictional Action Plan for Skills and TAFE 2024-25*. Melbourne.

⁵ Ewen, S., Ryan, T. & Platania-Phung, C. 2019, *Further Strengthening Research Capabilities: A review and analysis of the Aboriginal and Torres Strait Islander health researcher workforce*, The Lowitja Institute, Melbourne.

⁶ Department of Jobs, Skills, Industry & Regions (Victoria) (2024). *Victorian Jurisdictional Action Plan for Skills and TAFE 2024-25*. Melbourne.

Building the evidence base through Aboriginal and Torres Strait Islander-led research

Implementation of the Priority List should be upheld by Indigenous Data Sovereignty and Governance principles to ensure Aboriginal and Torres Strait Islander peoples have control and ownership over how data relating to apprenticeships, completions, and outcomes is collected, stored, interpreted, and used. The Lowitja Institute discussion paper *Taking Control of Our Data: A Discussion Paper on Indigenous Data Governance for Aboriginal and Torres Strait Islander People and Communities* includes a model for operationalising Indigenous Data Sovereignty and may provide overarching information to support a roadmap.⁷ Inherent to Indigenous Data Governance and Indigenous Data Sovereignty is Indigenous control, leadership and ownership. Therefore, the Department cannot operationalise Indigenous Data Governance or Indigenous Data Sovereignty within government systems and structures, but only through shifting power and control away from colonial systems can the Department facilitate Indigenous communities to enact and embed Indigenous Data Governance and Indigenous Data Sovereignty.


Embedding these principles will ensure that monitoring and evaluation of the Priority List reflects Aboriginal and Torres Strait Islander values, priorities, and worldviews - leading to more meaningful measures of success and continuous improvement in training outcomes.

Data is a valuable resource and a cultural, strategic and economic asset for Indigenous peoples. However, indicator production and outcome measurement is inherently political, driven by who sets the indicators and what lens they are applying to shape how success is defined, measured, evaluated and reported on. This influences how resources are distributed and how governments and stakeholders are held accountable. The current Apprenticeships Prioritisation methodology relies primarily on labour market and employer demand data, which can overlook the broader social, cultural, and community benefits of Aboriginal and Torres Strait Islander-led training pathways.

When Indigenous people define the indicators, we can ensure these measures reflect our own unique Indigenous Knowledge systems, cultures, values, priorities and aspirations. This supports self-determination and produces data that is meaningful, accurate, and actionable, for Indigenous communities themselves. We recommend evidence-based decision-making about apprenticeships and traineeships must be grounded in data and research that reflect Aboriginal and Torres Strait Islander community perspectives, priorities, and definitions of success.

To strengthen the evidence base, more investment is needed in Aboriginal and Torres Strait Islander-led research and evaluation in education, training, and workforce development. Aboriginal and Torres Strait Islander researchers and community

⁷ *Taking Control of Our Data: A Discussion Paper on Indigenous Data Governance for Aboriginal and Torres Strait Islander People and Communities*, Discussion Paper, Lowitja Institute, Melbourne. DOI: 10.48455/rtvd-7782



controlled organisations are best placed to generate insights into what supports effective participation, retention, and completion for our peoples.

Facilitating Indigenous leadership within the prioritisation process will ensure that future policy decisions are guided by robust, relevant, and community-owned evidence. This approach will improve the quality and impact of apprenticeships policy and contribute to the achievement of Closing the Gap Priority Reform Area 4, Shared access to data and information to support decision-making.

We make the following recommendation for consideration:

Recommendation 6: Build the evidence base through Aboriginal and Torres Strait Islander-led research.

Conclusion

Lowitja Institute welcomes this consultation and encourages the Department of Employment and Workplace Relations to embed Aboriginal and Torres Strait Islander leadership and community control in all aspects of the Priority List's design, implementation and monitoring.

By aligning apprenticeships and traineeships with the National Agreement on Closing the Gap and by recognising Aboriginal and Torres Strait Islander-led training and research pathways as national priorities, the Priority List can be a powerful lever for genuine transformation in education, employment, and health outcomes.