



Via email: IndigenousLanguagesSecretariat@arts.gov.au

To the International Decade for Indigenous Languages Directions Group

Re: Directions Group Priorities Paper

Thank you for the opportunity to provide feedback on the Directions Group *Indigenous Languages Priorities* paper (“**Priorities Paper**”).

The Aboriginal Languages Trust (“**ALT**”) is an Aboriginal-led New South Wales (“**NSW**”) Government agency established under the [Aboriginal Languages Act 2017](#) (“**the Act**”) to provide a focused, coordinated, and sustained effort in relation to Aboriginal Languages activities at local, regional and State levels.

The functions of the ALT are defined in the Act. They include:

- promoting Language activity
- identifying priorities for Language activity
- managing the funding of, and investment in Language activity
- promoting education and employment opportunities in Language activities
- promoting the wider use and appreciation of Aboriginal Languages

The ALT is also the lead NSW State Government agency for the National Agreement on Closing the Gap Target 16: By 2031, there is a sustained increase in number and strength of Aboriginal and Torres Strait Islander Languages being spoken.

In 2022, the ALT launched its inaugural five-year [Strategic Plan](#), which was developed following consultation with around 400 stakeholders, 81% of which identified as Aboriginal. The Strategic Plan outlines the ALT’s vision and purpose:

All NSW Aboriginal Languages are strong and healthy.

We aid in the growth and nurturing of NSW Aboriginal Languages by responding to the aspirations of Communities and participating in their self-determining work to reclaim and reawaken their Languages.

The ALT has a key role to play in activating the International Decade of Indigenous Languages (“**IDIL**”) in NSW. We look forward to working with the Directions Group and the Commonwealth Office for the Arts to develop an Action Plan that delivers meaningful outcomes for Aboriginal Language Communities.

Responses to the key areas of the Priorities Paper are outlined below. This feedback is informed by:

- The ALT Board, made up of nine Aboriginal members with the skills, expertise and experience relevant to the work of the ALT.
- Broad consultation the ALT undertook on its draft Strategic Plan to gain a better understanding of the aspirations and needs of Aboriginal Language Communities in NSW, including with Aboriginal

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Language Practitioners, Community members, Aboriginal Peak Bodies and major institutions, Aboriginal Community Controlled Organisations, and government representatives.

- Ongoing engagement between ALT staff and Aboriginal Language Practitioners and Community members in NSW.

THE THREE PRIORITY OBJECTIVES

The Priorities Paper outlines three priority objectives:

1. Stopping the loss

It must be acknowledged that, in NSW, all Languages have already experienced some degree of loss and therefore the focus is not on stopping the loss, but rather on revitalising Languages and awakening sleeping Languages.

2. Ensure the safety and security of the current investment

The current investment should not remain static; it should continue to grow.

3. Thinking about a new way forward

The ALT recommends rewording to ‘A new coordinated way forward’ to acknowledge the coming together of states and territories in one approach.

Recommendations

1. Reword objective 1 to acknowledge the focus in some areas on revitalisation rather than stopping loss.
2. Reword objective 2 to ‘Ensure continued growth in investment’.
3. Reword objective 3 to “A new coordinated way forward”.

THE FIVE PRIORITY POLICY REFORMS

1. Develop a national approach

The ALT supports exploration and consultation towards national Aboriginal and Torres Strait Islander Languages legislation and a national Languages policy. The *Aboriginal Languages Act 2017* and the thorough consultation process that led to its creation can be looked to as an example. Broad national consultation is critical, including state and territory level consultation.

The proposed legislation must include a funding model with increased investment in Language Centres and Community Language activities. It should also establish a national body for Languages that includes representation from all states and territories and seeks to coordinate and reduce duplication of national Languages working groups and advisory committees. Each state and territory should have its own representative group, based on existing networks, to provide advice to the national level.

National legislation should seek to set minimum standards that will complement current or future state/territory legislation or policy and seek to work collaboratively with each.

Note: The Aboriginal Languages Trust capitalises words that have distinct meaning for Aboriginal People. We do this as a sign of respect and note that it may vary from capitalisation used in Standard Australian English. These words include: Aboriginal, Indigenous, First Nations, Language, Culture, Community, Country, Custodians, Songlines, Lore/Law, Ancestors, Old People, Aboriginal People/s.

A national Languages policy should include a national employment award for Language workers, protection for Community control of Languages including data sovereignty, required structures and processes for consultation.

The ALT requires further information to be able to provide feedback on the proposed establishment of a national Aboriginal and Torres Strait Islander Languages Commission, however if a Commissioner role is established, it must be an Aboriginal or Torres Strait person.

The ALT supports increased funding for Language work and activities but acknowledges that some states or territories may not be able to secure Language-specific funding without a formal Language legislation or policy, so this should be the first priority.

In NSW, where there are few first Language speakers and English is often the first Language, there is less of a need for government services to be provided in the local Language. Government services should be encouraged to engage with local Language Communities about appropriate use of Language. The need for non-local people to learn the Language varies by place and Community; in some places local Language is necessary, in others Aboriginal People want to learn first and it is not appropriate for non-Aboriginal people to learn.

There is a pressing need for Indigenous Cultural and Intellectual Property (“**ICIP**”) law to protect Aboriginal People’s and Communities’ rights. This has been raised consistently by Language Practitioners and Communities in NSW. ICIP law should be considered as a section within national legislation, including penalties for breaches (this could be a role for the Commissioner).

The ALT supports increased investment in Languages research and evaluation to develop a stronger Australian evidence base around the benefits of supporting Languages. All Languages research and evaluation must be Community-led and adhere to the principles of Indigenous Data Sovereignty.

Measures used to track progress on Language work, such as those established under the National Agreement on Closing the Gap Target 16, must be determined by Communities through a co-design process, not by government. Current measures should be sense-checked with Communities to ensure they align with Community Language aspirations.

Recommendations

4. That national Languages legislation include a funding model with increased investment in Language Centres and Community Language activities.
5. Establish a national body for Languages that includes representation from all states and territories.
6. Develop a national employment award for Language workers.
7. Establish Indigenous Cultural and Intellectual Property (“**ICIP**”) law to protect Aboriginal People’s and Communities’ rights, which includes Languages rights.
8. Determine all measures for tracking progress on Language work through a Community co-design process.

2. Sector strengthening

Feedback gathered through the ALT’s consultation in NSW showed that there is high demand for more Language Centres that are Aboriginal Community owned and run, with sustainable government funding. There are currently only four Commonwealth funded Language Centres in NSW servicing a limited number of Languages. There are large gaps in geographic and Language group coverage, which needs to be urgently addressed.

The ALT supports an increase in funding to existing Language Centres and funding to establish new Language Centres so that every Aboriginal and Torres Strait Islander Language receives the support it needs to flourish. National funding must be in strategic alignment with any state/territory funding programs. The Aboriginal Languages Trust, which has a legislated role to manage funding to Aboriginal Language activities in NSW, should play a role in the coordination and dispersing of national funding to NSW programs. Funding programs should move away from reliance on competitive grants programs and move towards funding allocations based on Language Community needs.

Best practice guidelines for Language Centre governance need to be developed. These guidelines should relate to organisational structure and governance, not linguistic work, which must always be tailored to the local Language needs. The ALT acknowledges that there is no one 'best' method of undertaking Language revitalisation, and that there are many methods which can be employed, depending on variables within each Language Community. In developing these guidelines, care must be taken not to put unnecessary requirements on Language Centres or create exclusionary policies. Support should also be provided to Language Groups who are in the early stages of establishing their organisations and need support with governance, grant applications, auspicing arrangements etc.

While it is useful to look to international examples of Language revitalisation, there is a great deal of knowledge and expertise within Australia and many Communities would benefit from sharing and learning with each other in the first instance. Conferences, network groups and other Language ecosystems that seek to do this within Australia and states/territories should be prioritised.

The ALT supports the development of a sector workforce strategy and commends First Languages Australia for leading work in this space. A national employment award for Language workers and teachers is needed to ensure the fair and consistent conditions for all Language workers. There is a high demand for Language teachers in NSW, but problems with the sustainability of teaching careers. These roles must be remunerated in line with the specialist knowledge that Language teachers hold. Roles must be ongoing (not casual, short term) with career paths built in.

Recommendations

9. That national funding for Language Centres and Language activities be strategically aligned with any state/territory funding programs.
10. Develop best practice guidelines for Language Centre organisational governance.
11. Alongside Language Centres, support Language Groups who are in the early stages of establishing their organisations.
12. Prioritise conferences, network groups and other Language ecosystems that seek to share knowledge within Australia, whilst also looking to international examples.
13. Develop a sector workforce strategy that sets out remuneration and minimum conditions for Language teachers and workers in line with the specialist knowledge they hold.

3. Access to education and employment opportunities

Education

It should not be assumed that all Aboriginal and Torres Strait Islander Language Communities want their Languages taught within mainstream education institutions. In NSW, Community opinions vary about whether Languages should be taught in schools, TAFEs and universities. According to feedback from Communities across NSW, some want mandatory teaching of Aboriginal Languages in schools and early childhood centres, while others are concerned that when Languages are taught in schools, Communities

no longer have ownership or control of Languages. Aboriginal and Torres Strait Islander owned and run education providers should be prioritised for funding and support over mainstream education providers and Community Language groups should be funded to develop curriculum for their own Languages, including resource development, Community planning and training. Community ownership of the curriculum, rather than school ownership, is required to ensure ICIP is retained by Communities. Schools can then engage Community Language groups to teach. This model is currently used by some groups in NSW, such as for Dharawal Language teaching through the Gujaga Foundation.

While some education providers have strong and enduring relationships with local Language Communities, others are in the early stages of establishing these relationships and require guidance on how to engage. Guidelines on engaging Community Language teachers should be developed for education providers.

The ALT supports increased funding and support to Aboriginal and Torres Strait Islander owned and run early childhood centres and schools for bilingual education. The ALT also acknowledges that immersion schools have been extremely successful for Language revitalisation in other countries and should be given priority alongside bilingual schools. Bilingual and immersion schools should be made available to all Communities that want them, not only those that are defined as 'strong Language' Communities. Establishment of a bilingual school may be one of the key drivers towards a Community being recognised as a 'strong Language' Community.

Education providers are not the only means of Language teaching and learning. Language also needs to be taught on Country, and be inclusive of all i.e. not only school-age children. For example, there may be Language programs specifically targeted at Elders. The ALT supports home and Community-based Language learning programs, as well as other means of Language learning such as Language camps on Country.

One of the barriers to Language learning for adult learners is gaining access to courses run at times that conflict with employment and family commitments. To increase access, Aboriginal and Torres Strait Islander Language learners who are engaged in a Language course should be remunerated for their formal learning time. If a Language learner needs to take time off work to attend a Language course, they should be reimbursed for loss of wages.

Employment

While there is great demand for Aboriginal Language teachers in NSW, as outlined in section 2, care must be taken when designing accreditation programs. In NSW, some Community members feel that it should not be necessary for Language teachers to have teaching qualifications, that Language knowledge is a qualification in its own right. The ALT supports Community-led Language teacher training facilities, most likely run by Language Centres. Language teacher training positions should be paid roles.

There are concerns about individuals teaching Language without consent from the local Language Community. Teacher protocols must be determined and endorsed by the Community of that Language to maintain the integrity of Language teaching.

Career pathways for Language teachers need to be developed and promoted. In NSW, many Language teachers have described being underpaid and underemployed, causing few people to take up Language teaching as a profession.

Recommendations

14. Prioritise Aboriginal and Torres Strait Islander owned and run education providers for funding and support over mainstream education providers.
15. Fund Community Language groups to develop curriculum for their own Languages.
16. Develop guidelines for education providers about engaging Community Language teachers.
17. Give priority to both bilingual and immersion Language schools and make them available to all Communities that want them.
18. Remunerate Aboriginal and Torres Strait Islander Language learners who are engaged in a Language course.
19. Establish Community-led Language teacher training facilities and ensure Language teacher training positions are paid roles.

4. Truth telling and celebration

The ALT supports truth-telling activities and acknowledges its importance for healing.

The aim of activities and campaigns that celebrate and showcase Languages and Language work should be to increase support and investment for Communities' Language work. The net benefit should always be to Aboriginal and Torres Strait Islander Language Communities.

5. Community access to information

During consultation on the ALT's draft Strategic Plan, Language Communities highlighted the need for greater access to archives and Language materials held by collecting institutions. Not only should these institutions be sharing knowledge about collection practices and developing Community capability for working with archives, but they must also train and provide employment pathways for Aboriginal and Torres Strait Islander People to have careers in the GLAM (Galleries, Libraries, Archives and Museums) sector. Collecting institutions should undergo Cultural safety audits and put in place plans to ensure the Cultural safety of Aboriginal and Torres Strait Islander staff. Furthermore, collecting institutions must ensure the Cultural capability of existing staff to work with Aboriginal Torres Strait Islander Communities.

A national approach is needed to storing information to improve access, register, and record where and how information is kept, and ensure it is safe and accessible. To ensure the Cultural safety of access to documentation, protocols must be developed by Language Communities to control how archival information is accessed. These protocols should be built into any online access systems. Refer to [TK \(Traditional Knowledge\) Labels](#) which allow Communities to specify conditions for sharing of information.

A dedicated service should be established to proactively return materials to Communities, rather than Communities having to undertake search and discovery for themselves. Funding and training are needed for Community owned and run Keeping Places. ALT supports the funding of Community recording hubs, most likely as a function of Language Centres. Increased services are needed to support Communities to share resources.

State and territory records legislation need review, as some currently prohibit repatriation of materials to Aboriginal Torres Strait Islander Communities.

While funding the development of dictionaries, grammars etc. are important, equal emphasis should be put on the development of practical teaching resources such as workbooks, classroom materials and learning games.

Recommendations

20. That collecting institutions be proactive in building Community capability for working with archives and train and provide employment pathways for Aboriginal and Torres Strait Islander people to have careers in the sector.
21. That collecting institutions undergo Cultural safety audits and put in place plans to ensure the Cultural safety of Aboriginal and Torres Strait Islander staff.
22. That collecting institutions ensure the Cultural capability of existing staff to work with Aboriginal and Torres Strait Islander Communities.
23. Support Language Communities to develop protocols about how their archival information is accessed.
24. Establish a dedicated service to proactively return archive materials to Communities and invest in Community owned and run Keeping Places.
25. States and territories review their records legislations to ensure materials can be legally repatriated to Communities.

In closing, the ALT is keen to work together to develop an International Decade of Indigenous Languages Action Plan that will progress the self-determining Language work of Aboriginal and Torres Strait Islander Communities throughout Australia, particularly in NSW.

Thank you for the opportunity to provide these comments. Please reach out to Britt Jacobsen, A/Manager Policy & Research at britt.jacobsen@alt.nsw.gov.au for further information.

Sincerely



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Aboriginal Languages Trust
Date: 5 May 2023