

13 October 2023

## Attention: Closing the Gap Productivity Commission

Thank you for the opportunity to provide feedback on the Productivity Commission's draft report reviewing the National Agreement on Closing the Gap.

The Victorian Aboriginal Community Controlled Health Organisation (VACCHO) is the peak body for Aboriginal Community Controlled Health organisations (ACCOs or ACCHOs) in Victoria. VACCHO has 33 Members supporting Aboriginal people across Victoria and combined, are the largest employers of Aboriginal people in the state. We advocate for our Members and Aboriginal community at the state and national levels on all issues related to Aboriginal health and wellbeing.

VACCHO has consulted with Ngaweeyan Maar-oo in relation to this review and firmly supports the feedback given in their report, as well as that of the Coalition of Peaks and the multiple other submissions from the Victorian Closing the Gap Koorie Caucus members.

While we welcome the proposals to embed responsibilities for driving action within the public sector it is important that the weight of the accountability must not sit squarely on Community services. It is of paramount importance that Government departments and individual Ministers who are involved with the program must ensure the Secretariat and other stakeholders are appropriately resourced for the expected workload and output associated with actions required to Close the Gap.

By way of summary in response to the recommendations of the report:

- VACCHO supports draft recommendation 1: *Appointing an organisation to lead data development under the Agreement*
- VACCHO supports draft recommendation 2 pending further discussions around ensuring the work remains self-determined and Community-led through co-chairing and accountability measures: *Designating a senior leader or leadership group to drive jurisdiction wide change*
- VACCHO believes further work is required on draft recommendation 3: *Embed responsibility for improving cultural capability and relationships with Aboriginal and Torres Strait Islander people into public sector employment requirements*
- VACCHO supports draft recommendation 4 on the proviso that self-determination is maintained: *Central agencies leading changes to Cabinet, Budget, funding and contracting processes.*

Further reasoning and evidence in support of these stances are outlined in the following pages. Should you wish to discuss this submission further, please contact Gordon Conochie, Executive Manager for Policy,

Kind regards

Dr Jill Gallagher AO (HonLLD)  
Chief Executive Officer

## Responses to Requests for information

### **Request 1: Effectiveness of policy partnerships**

Insufficient resourcing for ACCOs is the key barrier to meaningful engagement and participation. Many Community stakeholders are represented on multiple caucuses without the funding to employ policy or support staff. Each caucus requires pages of preparation work, follow up actions, ongoing networking and engagement on top of the meeting itself. This is unrealistic and unsustainable for the many organisations without additional resourcing to support the CEO in their attendance.

Policy partnerships provide accountability mechanisms by ensuring there is guaranteed opportunities for feedback. Using regular meetings as deadlines for action can prompt updates and enforce priorities, and the knowledge that government representatives will be meeting with their counterparts can motivate action.

VACCHO has found success in partnerships such as the Aboriginal Health and Wellbeing Partnership Forum. This Partnership has regular meetings between policy staff at VACCHO and the Aboriginal Health Department built into the Terms of Reference, as well as meetings between VACCHO executives and Department of Health leadership. The regular meetings has been effective for monitoring progress, motivating access and providing opportunities for feedback. It has also meant that inaction can be addressed directly. This Partnership has developed an agreement and action plan with timelines, expectations and responsibilities clearly articulated and agreed upon by both parties. [More information can be found here.](#)

### **Request 2: Shifting service delivery to Aboriginal community-controlled organisations**

#### Examples of good practice in transferring service delivery to ACCOs:

[The Beautiful Shawl Project](#) is a poignant example of transferring service delivery to an ACCO and was the result of a collaboration between VACCHO and Breast Screen Victoria.

Feedback and consultation with Community had found that key barrier to taking part in preventative breast cancer screenings included limited access to services in regional areas and cultural inaccessibility. Many Community members don't feel comfortable or safe attending mainstream healthcare settings, and with most early detection services being based in hospitals in regional areas, very few Aboriginal and Torres Strait Islander women were taking part in the recommended screenings. Data found that instances of cancer in Community was not significantly higher per capita than the non-Aboriginal and Torres Strait Islander population, but the rate of deaths as a result of cancer were.

Working groups made up of cancer experts, ACCO sector representatives, Community members and VACCHO staff came together to find ways to address these barriers. This group subsequently came up with the idea of the Beautiful Shawl Project. There were two key components of the project: mobile access to breast screening services and culturally appropriate shawls to increase a feeling of safety and therefore motivation to take part.

Funding was received to take breast screening vans to different ACCOs and Health Services across Victoria and to commission artworks from local artists of targeted geographic areas. 12 ACCOs took part in the project, with 11 distinctive shawl artworks developed.

219 screens were provided to Aboriginal clients aged 50+ through the first year of the project (and an additional 149 non-Aboriginal clients, predominantly family members and ACCO staff). Of those 219, 54 were overdue for their screen and 76 had never taken part in a breast screen. Attached is an infographic with further information, and the 12-minute documentary on the project [can be viewed here](#).

The Beautiful Shawl Project continues to provide culturally safe and accessible breast screenings to Aboriginal and Torres Strait Islander women across Victoria.

#### Including obligations for governments into service delivery contracts

- Any non-ACCO service that receives data from an ACCO must provide relevant data in return upon request to support service delivery and design.
- There must be effective KPI systems for government bodies built into contracts, including indicators that are decided by and reported to the Koorie Caucus.
- Non-ACCOs receiving funding for Aboriginal and Torres Strait Islander programs must include paid consultancy with ACCO staff prior to commencement of work.

#### **Request 3: Transformation of government organisations**

No comment.

#### **Request 4: Indigenous Data Sovereignty and Priority Reform 4**

A substantive difference between the way Priority Reform 4 is currently described and an explicit reference to Indigenous Data Sovereignty sits in the definition of data sovereignty itself. Priority Reform 4 is designed around shared access and partnerships between governments and Communities to guide collection, access and management of data. This is not Indigenous Data Sovereignty.

One definition of Indigenous Data Sovereignty from the Australian Institute of Aboriginal and Torres Strait Islander Studies is 'the right of Indigenous peoples to govern the collection, ownership and application of data about Indigenous communities, peoples, lands, and resources ... Indigenous data governance is built around two central premises: the rights of Indigenous nations over data about them, regardless of where it is held and by whom; and the right to the data Indigenous peoples require to support nation rebuilding.' (1).

The assumption inferred by clause 71(d) in the National Agreement is that Community needs the support and aid of the Commonwealth to effectively manage its own data; this deficit-lens is in opposition to self-determination and the strengths-based approach that Closing the Gaps sees itself working under. It is also necessary to define 'meaningful' data collection to ensure a shared understanding of data collection priorities.

The development of criteria by the Coalition of Peaks under clause 76 of the National Agreement shows an element of sovereignty, but this is barely enough to qualify under the

AIATSIS definition and VACCHO do not believe that Closing the Gap currently acknowledges, understands or truly commits to Indigenous Data Sovereignty.

#### **Request 5: Legislative and policy changes to support Priority Reform 4**

VACCHO supports the response provided by Ngaweeyan Maar-oo's to the Productivity Commission's response on this request. However, VACCHO would like to take this opportunity to reiterate the following from Ngaweeyan Maar-oo:

- Barriers to self-governance through data include inconsistent data collection, poor understandings of the importance of data sets and the time and resource shortage of ACCO staff.
- Mainstream settings are not consistent in asking for identification, and Community members report feeling unsafe or worried about being stigmatised if they identify as Aboriginal or Torres Strait Islander. Mainstream data collectors must take part in mandatory and ongoing cultural safety training. **This is in line with the Aboriginal Health and Wellbeing Partnership Forum's Cultural Safety priority.**
- The Victorian Koori Caucus welcomes the recommendation for an organisation to lead data development under the Agreement.
- This organisation must be given the funding and resourcing necessary and should not be expected to lead data development under the Agreement with its current staffing.

#### **Performance reporting tools – dashboard and annual data compilation report**

Any performance reporting to inform Closing the Gap must have consistent methodologies across all jurisdictions. VACCHO has seen the difficulties in collating data from multiple collection points across one state, and warn that without streamlined collection methodologies, there will be significant time and funding needed to align results to ensure accuracy.

Previous data collection has been hampered by the multiple different collection platforms and processes which lead to unaligned and inaccurate results. Staffing and resourcing shortages across smaller organisations has also contributed to fewer or inconsistent responses. There is a significant burden of over reporting across the Aboriginal Health sector, and the Closing the Gaps and ADCR requirements continue to increase the workload on overworked and underfunded organisations.

### **Feedback on recommendations**

#### **Recommendation 1: Appointing an organisation to lead data development under the Agreement**

VACCHO welcomes the recommendation for stronger data governance and a streamlined approach to data development, and highlights the work already being done in Victoria in this space:

VACCHO's data collection team have worked with Dental Health Services Victoria to combine datasets in support of Department of Health/Aboriginal Health Department project

proposals. These projects are aiming for rollout over the next 5 years to support better oral health in Community. Using ACCO Member data to cross reference with mainstream data, it was clear there were discrepancies between sources and highlighted the need for data collection support and cultural safety.

The data highlighted significant gaps in services and the regions most at need of dental appointments, which guided the proposal group and supported anecdotal evidence from the ACCOs. Data has been a very important part of VACCHO's advocacy and Member support work for years and will continue to be over the years to come.

Additionally, the data will guide the Aboriginal Oral Health Project Governance Group to make better strategic decisions. This is the first time VACCHO and our members will be able to gain a data based understanding of the regions' oral health needs and as such, assist with evaluations in the coming years.

This data will guide the service mapping and priority regions in funding applications for ongoing programs and service design for ACCOs across Victoria.

#### Appointing lead data development organization

In appointing an organisation to lead data development:

- The organisation should be community controlled, or at the very least have Aboriginal and/or Torres Strait Islander representation in their governance and executive team.
- They must have proven ability to work with Community and be endorsed by an ACCO as a part of the selection process.
- They must mandate ongoing cultural safety training for all staff and effective consultation strategies with community members.

VACCHO would welcome further discussions about this appointment and our sector-leading work in data development and Indigenous Data Sovereignty.

#### *Recommendation 2: Designating a senior leader or leadership group to drive jurisdiction-wide change*

VACCHO is supportive of Closing the Gap supporting a new role to drive jurisdictional change, however we have concerns around the placement of that position and its scope and accountability. The appointment of a non-Community member to a role such as this would go against the principles of self-determination and risk the jurisdictional change being seen from a government perspective, rather than a Community-led approach. The title of 'Senior Leader' is also inappropriate in the context.

We recommend a 'Public Sector Commissioner' position to work in partnership with a paid representative from the Partnership Council to ensure changes the jurisdictional changes will have the desired effect on Closing the Gap and the Aboriginal and Torres Strait Islander community.

*Recommendation 3: Embed responsibility for improving cultural capability and relationships with Aboriginal and Torres Strait Islander people into public sector employment requirements*

VACCHO believes this recommendation should go further and mandate cultural safety training for all public sector employees.

The Aboriginal Health and Wellbeing Partnership Action Plan includes a requirement for all public health service staff to attend mandated and regular cultural safety training, and VACCHO are in the process of developing a 'Blak Tick Approval' scheme to ensure cultural safety is embedded across all health services in the state. VACCHO would be happy to provide further information on our plans for the scheme on request.

*Recommendation 4: Central agencies leading changes to Cabinet, Budget, funding and contracting processes*

VACCHO supports central agencies in their work to lead impactful change within government processes. Further information is required on the following:

- Would this require changes to Commonwealth and state budgeting processes to align with Closing the Gap processes?
- Will there be additional funding provided to this agency for the time and expertise required?
- Who would they be accountable to?

These draft recommendations risk creating a barrier between Government and the delivering agencies. There must be accountability measures and mechanisms in place to ensure that Government doesn't attempt to scapegoat the central agencies, lead organisations and/or senior leadership for failings while still communicating directly to the Caucus groups.

Self-determination must not be lost by putting non-Community organisations in leadership or coordination roles; equally, Community organisations cannot be expected to take on the additional workload without equitable increases to funding and resourcing.

## Conclusion

The work being done by the Community Controlled sector is extensive, dedicated and overwhelmingly underfunded. Our organisations have been working to close the gap for decades, with success that belies the support given by Commonwealth and state governments.

Without additional resourcing to employ supporting staff to cover the workload, the engagement with Closing the Gap will only take time away from the direct service delivery our Community needs.

The gaps Aboriginal and Torres Strait Islanders face will only be closed with real engagement from a government that shows ambition and commitment to creating structural change. VACCHO welcomes the Productivity Commission's reporting of the delays, inaction and weaknesses exposed by the review, and hopes that our contribution through this submission



will be taken seriously to inform stronger recommendations that are adopted by Governments.

## References

1. **Associate Prof Gawaian Bodkin-Andrews, Prof Maggie Walter, Dr Vanessa Lee, Prof Tahu Kukutai, Dr Ray Lovett.** *Delivering Indigenous Data Sovereignty*. s.l. : AIATSIS, 2019.