

*PHAA submission on the Closing the Gap Review - Review paper 2:
Proposed approach and invitation to engage with the review.*



Closing the Gap Review
Productivity Commission
ctg.review@pc.gov.au

20 December 2022

Dear Commissioners,

The **Public Health Association of Australia** (PHAA) is Australia's peak body on public health. The health status of all people is impacted by the social, commercial, cultural, political, environmental, and economic determinants of health. Specific focus on these determinants is necessary to reduce the root causes of poor health and disease. These determinants underpin the strategic direction of PHAA.

We advocate for the health and well-being of all individuals in Australia. We believe that health is a human right, a vital resource for everyday life, and a key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people's health. Equity is a key goal of the PHAA and working with Aboriginal and Torres Strait Islander people to improve closing the health gap is central to PHAA's mission.

Our mission is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health. Strengthening Aboriginal and Torres Strait Islander health and wellbeing is a core component of that work. We recognise the value of, and seek to incorporate, First Nations knowledges as an integral part of this mission. To this end, PHAA has been a member of the Close the Gap Campaign Steering Committee for many years.

PHAA thus welcomes the opportunity to provide input to the Productivity Commission on the *Closing the Gap Review - Review paper 2: Proposed approach and invitation to engage with the review*, and the opportunity to endorse the submission from the Close the Gap Campaign Steering Committee. We specifically direct our comments to the first two sections of the review paper.

1. Questions relating to the Commission's proposed approach to the review

PHAA notes that the current method of reporting against the Closing the Gap targets is inadequate, and inaccurately reports progress against the intended outcomes. PHAA thus supports shifting the focus to measuring what needs to be done, and what services should be provided, to meet those targets. Specifically, how services are funded to meet need, should be a key measure for future reporting. Governments need to be held to account to ensure a needs-based approach to policy and program development and grant allocations are provided on a needs-based funding model.

Developing and building an evaluation framework that assesses progress towards the four Priority Reforms of the National Agreement, therefore seems a more effective evaluation approach than methods used in previous reviews. However, this approach needs to be adequately resourced so that the Commission can perform a systematic, data-informed review that adequately captures the structural change needed to close the gap in health and wellbeing for Aboriginal and Torres Strait Islander peoples.

To achieve this, the Commission will need to work cross-jurisdictionally to strengthen and expand existing data sets to capture consistent, relevant, and localised data. Aboriginal and Torres Strait Islander leadership and decision-making must be embedded in all aspects of data collection, analysis, use and interpretation, in accordance with the principles of Indigenous Data Sovereignty.

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Both the Indigenous Evaluation Strategy and Indigenous Advancement Strategy previously developed by the Commission, provide principles that should inform the engagement approach utilised: namely it should be First Nations centred, credible, useful, transparent, and accountable. It should also align with the Truth Telling process that is central to the *Uluru Statement from the Heart*.

2. Questions relating to the selection of case studies.

PHAA acknowledges that the Commission is considering a case studies approach, due to the significant number of, infeasibility of adequately assessing, and insufficient data to measure, the listed governmental actions in the jurisdictions' implementation plans.

Although PHAA notes that a case study approach can provide rich and insightful examples of practice, we have concerns regarding the rigour of such an approach, without clear evaluation criteria and supporting data on impacts. We support the suggestions made in the Close the Gap Campaign submission for potentially reconsidering the suggested criteria, should this approach proceed.

However, given our focus on human rights, PHAA suggests exploring alternative frameworks being used to evaluate implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), as health is a basic human right. Australian Governments must be held to account and meet their obligations under the National Agreement "to overcome the entrenched inequality faced by too many Aboriginal and Torres Strait Islander people so that their life outcomes are equal to all Australians".

The PHAA appreciates the opportunity to make this submission and comment on the proposed way to assess progress on the commitments in the Agreement.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission. The best contact is Dr Leanne Coombe, Policy and Advocacy Manager at

Yours Sincerely,

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