Dear Productivity Commission

Thank you for the opportunity to respond to the *Review of the National Agreement on Closing the Gap* draft report. Please find the comments from the Australian Institute of Health and Welfare (AIHW) below.

Data development (page 65)
The draft proposes that an organisation or entity with dedicated resourcing and staffing to lead data development should be appointed. Among its responsibilities would be "identifying the most critical indicators of change and prioritising them for data development". The AIHW agrees that review and prioritisation is needed. However, it might be worthwhile to consider whether improving existing processes rather than appointing a new organisation would be the best approach. It would take time for a new organisation to develop the relationships necessary to lead this work, which would further delay the start of any data development.

We note that data development work sometimes takes a significant amount of time (many years) and may require funding to support new or amended data collections. In addition, states/territories will need to implement changes in their systems. To be successful, data development work related to the Closing the Gap requires strong leadership within government and across the Coalition of Peaks. There is a risk that this will not happen without appropriate authority and monitoring. Central agencies will therefore need to help drive and coordinate the data development. Clear roles and responsibilities are needed, and coordination is required. Given the importance of this work, progress could be reported to Ministers on a regular basis.

Indigenous data sovereignty (page 54)
Given that Indigenous Data Sovereignty is not mentioned under Priority Reform 4 in the 2020 National Agreement on Closing the Gap, it would be worthwhile for the report to consider how the Indigenous Data Sovereignty could work with data sets that cover the entire Australian population (e.g. administrative data sets)

Community data projects (page 59)
The draft report states that one unresolved issue is that it is unclear "to what extent organisations participating in the projects will continue to have control over the data uploaded to the data portal supporting each project, which has been developed by the Australian Institute of Health and Welfare". The way this will work has not changed; the communities will decide who can access the portal, and they will have control over the data within the portal.

Performance reporting tools (page 11)
The AIHW suggests that adding references to relevant material from other existing products (e.g. the *Aboriginal and Torres Strait Islander Health Performance Framework* website) would be better and easier than adding the same material to the dashboard. We also note that the *Regional Insights for Indigenous Communities* website, which presents regional statistics, could be used to complement the national-level reporting.

Presenting data through visual tools (page 56)
The *Regional Insights for Indigenous Communities* website not only presents statistics based on socio-economic data but also other demographic and health-related statistics.

Regional disaggregation (page 63)
To inform discussions about the appropriate level of geographic disaggregation, it might be good to make sure that it is clear to everyone that the usefulness and accuracy of local-area statistics will

depend not only on the availability and quality of the numerator data, but also on the availability and accuracy of local-area population estimates.