

9 September 2025

The Commissioners
Productivity Commission
Australian Government
E: 5pillars@pc.gov.au

Dear Commissioners,

Children's Cancer Institute Response – Interim Reports – Five Pillars of Productivity Inquiries

On behalf of Children's Cancer Institute (CCI), I thank you for the opportunity to provide feedback on interim reports 1, 3, 4 and 5 of the Five Pillars of Productivity Inquiries.

Children's Cancer Institute is Australia's sole independent medical research institute wholly dedicated to pioneering research and innovative treatments to improve the lives of children affected by cancer. The Institute has developed a world-class research environment that merges laboratory-based science with clinical translation pathways for over forty years.

While medical research has not been a central focus of the five productivity inquiry reports, it is a fundamental driver underpinning them. A stronger emphasis on research and its translation is essential for Australia to realise its full productivity potential.

Inquiry 1: Creating a More Dynamic and Resilient Economy

Children's Cancer Institute supports efforts to reform regulations to foster growth and innovation.

Like many research organisations, we operate within a complex suite of explicit legislative and regulatory requirements, spanning workplace health and safety, privacy, and research conduct.

Any clear agenda for reform must ensure that regulation is streamlined and risk-proportionate, and that new requirements do not create unnecessary administrative burden or excessive costs.

Inquiry 3: Harnessing Data and Digital Technology

We support the Commissioners' recommendation that a right to erasure is not introduced under the privacy reforms.

Regarding the recommendation to introduce an alternative compliance pathway, Children's Cancer Institute considers it essential that the model include deemed-to-comply standards with safe harbour protections, a duty of care framework tailored to medical research, and enforcement integrated with existing NHMRC/HREC oversight. This should be supported by detailed sector-specific guidance on acceptable privacy outcomes and a clear liability framework, providing medical research institutes with certainty, proportionality, and alignment with research ethics, while avoiding any additional costs.

Children's Cancer Institute opposes the inclusion of research data in general access pathways and instead advocates for research-specific controls, professional interpretation requirements, and liability protection for the appropriate sharing of data.

We also recommend a specific focus on addressing Australia's fragmented and inconsistent approaches to health data access, which continue to be a major barrier to innovation. The lack of a unified national health data system, where jurisdictions operate under different rules, standards, and processes, creates delays, duplication, and siloed datasets that undermine productivity, which should be addressed within the reform agenda.

Inquiry 4: Building a Skilled and Adaptable Workforce

Children's Cancer Institute recognises the emphasis on improving school student outcomes. However, there should be greater focus on careers education that highlights national skills shortages, such as STEM, to guide students into high-demand fields, strengthen workforce capability, and boost productivity.

Inquiry 5: Delivering Quality Care More Efficiently

We support the establishment of a National Prevention Investment Framework. To be effective, it must have dedicated funding attached, with clear recognition of the role of independent medical research institutes in driving prevention. This should include support for prevention research, such as developing preventive treatments for children at high risk of cancer.

By embedding medical research and its translation more explicitly within the productivity agenda, Australia can secure the skills, innovation, and economic growth needed for a successful future.

If you have any questions, please contact [REDACTED]

Yours sincerely,

[REDACTED]

Dr Peter Wejbora

Director, Research Development and Partnerships
Children's Cancer Institute