



Gayaa Dhuwi (Proud Spirit) Australia

Aboriginal and Torres Strait Islander Leadership in Social and Emotional Wellbeing, Mental Health and Suicide Prevention

Submission to the Productivity Commission inquiry into delivering quality care more efficiently

Gayaa Dhuwi (Proud Spirit) Australia would like to acknowledge the traditional custodians of country throughout Australia, and pay respects to all Elders, past, present, and emerging.

About Gayaa Dhuwi (Proud Spirit) Australia

Gayaa Dhuwi (Proud Spirit) Australia is the national leadership body for Aboriginal and Torres Strait Islander social and emotional wellbeing, mental health, and suicide prevention. As a community-controlled organisation, it is governed and controlled by Aboriginal and Torres Strait Islander experts and peak bodies, working in these areas to promote collective excellence in mental health care.

Executive Summary

Gayaa Dhuwi (Proud Spirit) Australia welcomes the Productivity Commission's interim report on delivering quality care more efficiently and its focus on systemic reform. For Aboriginal and Torres Strait Islander Peoples, quality care is defined by cultural safety, self-determination, and a holistic approach to social and emotional wellbeing. We support the intent of the draft recommendations to align regulation, embed collaborative commissioning, and invest in prevention, but they must be strengthened to drive genuine, transformative change for our communities.

This submission asserts that reforms must be implemented in full partnership with our people, as mandated by the *National Agreement on Closing the Gap*. We call for the full funding and implementation of the Aboriginal and Torres Strait Islander-led *Gayaa Dhuwi (Proud Spirit) Declaration Framework and Implementation Plan* as the central roadmap for reform. Key recommendations include mandating cultural safety standards across all care sectors, ensuring Aboriginal Community Controlled Health Organisations are resourced as equal partners in commissioning, and establishing Aboriginal and Torres Strait Islander leadership within the proposed National Prevention Investment Framework. Without these binding commitments, the cycle of review without reform will continue, and the devastatingly high rates of suicide and poor health outcomes in our communities will persist.

Introduction

Gayaa Dhuwi (Proud Spirit) Australia welcomes the opportunity to provide a submission to the Productivity Commission's inquiry into 'Delivering quality care more efficiently'. As the national peak body for Aboriginal and Torres Strait Islander social and emotional wellbeing, mental health, and suicide prevention, we lead the call for systemic change that places the voices, strengths, and needs of our Peoples at the centre of national reforms.



Gayaa Dhuwi (Proud Spirit) Australia

Aboriginal and Torres Strait Islander Leadership in Social and Emotional Wellbeing, Mental Health and Suicide Prevention

We support the inquiry's focus on enhancing connections between sectors, breaking down siloed government decision-making, and improving the efficiency of care delivery (Productivity Commission 2025). However, for our people, 'quality care' is fundamentally defined by cultural safety, self-determination, and a holistic social and emotional wellbeing framework. Efficiency cannot come at the expense of cultural integrity.

The interim report's recommendations to align regulation, embed collaborative commissioning, and invest in prevention are welcome and align with our long-standing policy vision. These reforms must be implemented in full partnership with Aboriginal and Torres Strait Islander Peoples, as mandated by the *National Agreement on Closing the Gap* (Australian Governments and Coalition of Peaks 2020), and guided by the principles of the *Gayaa Dhuwi (Proud Spirit) Declaration* (Gayaa Dhuwi (Proud Spirit) Australia 2015). This submission provides our perspective on the draft recommendations, outlining how they can be strengthened to deliver genuine, transformative change for our communities.

Background

The need for system transformation

The Australian care system continues to fail Aboriginal and Torres Strait Islander Peoples. This is not a deficit on our part, but a failure of systems that are not culturally safe, responsive, or designed to meet our needs (Gee, Dudgeon, Schultz, Hart, & Kelly 2014). The consequences are devastating and entirely preventable. In 2023, the suicide rate for our people was 30.8 per 100,000, an increase from 23.6 in 2018, with the Productivity Commission assessing this target as worsening (Productivity Commission 2025). This is not just a statistic, but a profound loss felt deeply across families and communities.

For decades, landmark reports have called for urgent reform. The 1995 *Ways Forward* report laid out a comprehensive, community-led plan grounded in self-determination and holistic care (Swan & Raphael 1995). Yet, almost 30 years later, many of its core recommendations remain unimplemented. This pattern of review without reform has resulted in a generation of unmet commitments and unfulfilled promises, leaving our communities to bear the cost (Gayaa Dhuwi (Proud Spirit) Australia 2025).

Social and emotional wellbeing and the Gayaa Dhuwi (Proud Spirit) Declaration

To deliver quality care, the system must understand what wellbeing means to Aboriginal and Torres Strait Islander Peoples. Social and emotional wellbeing is a holistic concept that encompasses connection to Country, culture, spirituality, family, and community (Gee et al. 2014). It is the foundation of our strength and resilience. This understanding is articulated in the *Gayaa Dhuwi (Proud Spirit) Declaration*, an Aboriginal and Torres Strait Islander-led blueprint for mental health reform (Gayaa Dhuwi (Proud Spirit) Australia 2015).

Although all Australian governments committed to supporting the Declaration's implementation in the *Fifth National Mental Health and Suicide Prevention Plan*, it remains largely unfunded and unrealised (Department of Health 2017). The *Gayaa Dhuwi (Proud Spirit) Declaration Framework and Implementation Plan* now provides a clear, co-designed roadmap to turn this commitment into action (Gayaa Dhuwi (Proud Spirit) Australia 2025). True efficiency and quality in the care economy can only be achieved when this foundational work is resourced and prioritised.



Gayaa Dhuwi (Proud Spirit) Australia

Aboriginal and Torres Strait Islander Leadership in Social and Emotional Wellbeing, Mental Health and Suicide Prevention

The National Agreement on Closing the Gap

The Productivity Commission's recommendations align with the transformative intent of the *National Agreement on Closing the Gap* (Australian Governments and Coalition of Peaks 2020). The four Priority Reforms outlined in the *National Agreement*—Formal Partnerships and Shared Decision-making, Building the Community-Controlled Sector, Transforming Government Organisations, and Shared Access to Data and Information—must be the lens through which any reforms on efficiency and quality are viewed and implemented (Australian Governments and Coalition of Peaks 2020). Improving the productivity of the care economy for our people is inseparable from advancing these fundamental structural reforms.

Response to Draft Recommendations

Gayaa Dhuwi (Proud Spirit) Australia supports the intent of the three draft recommendations in the interim report. However, to be effective for Aboriginal and Torres Strait Islander Peoples, they require strengthening to ensure they are implemented in a way that embeds cultural safety and empowers our communities.

Reforming quality and safety regulation

We acknowledge the positive intent of **Draft Recommendation 1.1** to create a more cohesive regulatory framework and reduce duplication (Productivity Commission 2025). For Aboriginal and Torres Strait Islander Peoples, 'quality' and 'safety' are defined by the presence of cultural safety. Any reform to align regulation must therefore have cultural safety as its central, non-negotiable tenet. Streamlining processes without embedding cultural safety will fail to deliver quality care.

We support the development of a single set of practice and quality standards for aged care and NDIS services, but only if it is co-designed and governed in genuine partnership with Aboriginal and Torres Strait Islander leadership, consistent with **Priority Reform One** of the *National Agreement* (Australian Governments and Coalition of Peaks 2020). Such standards must recognise and enable Aboriginal and Torres Strait Islander models of care, rather than imposing a one-size-fits-all mainstream approach.

Embedding collaborative commissioning

We strongly support **Draft Recommendation 2.1** to embed collaborative commissioning, with its focus on strengthening partnerships between Local Hospital Networks, Primary Health Networks, and Aboriginal Community Controlled Health Organisations (ACCHOs) (Productivity Commission 2025). This approach is critical to overcoming the fragmented and siloed systems that create gaps in care for our people.

ACCHOs are longstanding examples of successful, integrated, and place-based commissioning, delivering holistic services that are responsive to community needs (Productivity Commission 2025). It is vital that ACCHOs are engaged as **equal partners** in governance and decision-making, not merely as stakeholders to be consulted. This is a core requirement of **Priority Reform One** of the *National Agreement* (Australian Governments and Coalition of Peaks 2020).

Furthermore, 'flexible funding' must be genuinely flexible and long-term. The current reliance on short-term, prescriptive funding cycles constrains the capacity of our organisations to plan effectively and build sustainable services (Productivity Commission 2025). We also support the focus



Gayaa Dhuwi (Proud Spirit) Australia

Aboriginal and Torres Strait Islander Leadership in Social and Emotional Wellbeing, Mental Health and Suicide Prevention

on reducing potentially preventable hospitalisations (PPHs), which are often the result of systemic failures in primary care and the social determinants of health (Productivity Commission 2025).

Investing in prevention

We strongly support **Draft Recommendation 3.1** to establish a National Prevention Investment Framework (Productivity Commission 2025). The concept of prevention is fundamental to the Aboriginal and Torres Strait Islander concept of social and emotional wellbeing. For our communities, prevention is not just about clinical interventions. It is about strengthening the cultural and social determinants of health. These are the protective factors that build resilience and create thriving communities (Gayaa Dhuwi (Proud Spirit) Australia 2025).

We support the creation of a national independent advisory board, provided it has mandated and significant Aboriginal and Torres Strait Islander leadership and expertise. This is essential to ensure that investment decisions are culturally informed and that proposed programs are assessed for their cultural safety and relevance, aligning with **Priority Reform One** of the *National Agreement*. Such a framework has the potential to overcome the siloed funding and 'wrong pocket problem' that has historically limited investment in the holistic, cross-portfolio prevention initiatives that our people need (Productivity Commission 2025).

Recommendations

Gayaa Dhuwi (Proud Spirit) Australia recommends that the Productivity Commission strengthens its final recommendations to the Australian Government by including the following:

1. **Mandate that any reform of quality and safety regulation is co-designed and governed with Aboriginal and Torres Strait Islander leadership**, embedding cultural safety as a core, measurable, and enforceable standard for all care providers.
2. **Strengthen the recommendation on collaborative commissioning by mandating that ACCHOs are resourced and recognised as equal partners** in governance, planning, and decision-making, in line with Priority Reform One of the *National Agreement on Closing the Gap*.
3. **Ensure the proposed National Prevention Investment Framework has mandated Aboriginal and Torres Strait Islander leadership on its advisory board** and prioritises investment in community-led programs that strengthen the cultural and social determinants of health and wellbeing.
4. **Establish binding accountability mechanisms across the entire care economy**, including mainstream and non-government services, to ensure all providers are delivering culturally safe care and are held accountable for contributing to the targets in the *National Agreement on Closing the Gap*.



Gayaa Dhuwi (Proud Spirit) Australia

Aboriginal and Torres Strait Islander Leadership in Social and Emotional Wellbeing, Mental Health and Suicide Prevention

Conclusion

The Productivity Commission's inquiry presents a critical opportunity to move beyond rhetoric and deliver tangible reforms that will save lives and improve the wellbeing of Aboriginal and Torres Strait Islander Peoples. The interim report's focus on cohesion, collaboration, and prevention is a positive step, but these reforms will only succeed if they are shaped by Aboriginal and Torres Strait Islander leadership, knowledge, and cultural authority.

Implementing the *Gayaa Dhuwi (Proud Spirit) Declaration Framework and Implementation Plan* is not an optional extra, but the essential, evidence-based pathway to achieving a culturally safe and effective care system. We urge the Commission to adopt our recommendations and champion a future where the care economy is not just more efficient, but also more just, equitable, and effective for our communities. The time for incremental change is over. The moment for systemic transformation is now.



Gayaa Dhuwi (Proud Spirit) Australia

Aboriginal and Torres Strait Islander Leadership in Social and Emotional Wellbeing, Mental Health and Suicide Prevention

References

1. Australian Governments and Coalition of Peaks. 2020. *National Agreement on Closing the Gap*. Canberra: Australian Government.
2. Department of Health, 2017. *Fifth National Mental Health and Suicide Prevention Plan*. Australian Government, Canberra.
3. Gayaa Dhuwi (Proud Spirit) Australia. 2015. *Gayaa Dhuwi (Proud Spirit) Declaration*. Retrieved September, 2025 from: <https://www.gayaadhuwi.org.au/gayaa-dhuwi-proud-spirit-declaration/>
4. Gayaa Dhuwi (Proud Spirit) Australia, 2025. *Gayaa Dhuwi (Proud Spirit) Declaration Framework and Implementation Plan*. Canberra: Gayaa Dhuwi (Proud Spirit) Australia.
5. Gayaa Dhuwi (Proud Spirit) Australia. 2025. *System-wide approach to Aboriginal and Torres Strait Islander social and emotional wellbeing, mental health, and suicide prevention*. Canberra: Gayaa Dhuwi (Proud Spirit) Australia.
6. Gee, G., Dudgeon, P., Schultz, C., Hart, A., & Kelly, K. 2014. Aboriginal and Torres Strait Islander social and emotional wellbeing. In P. Dudgeon, H. Milroy, & R. Walker (Eds.), *Working together: Aboriginal and Torres Strait Islander mental health and wellbeing principles and practice* (2nd ed., pp. 55-68). Department of the Prime Minister and Cabinet.
7. Productivity Commission, 2025. *Delivering quality care more efficiently*, Interim report, Canberra, August.
8. Swan, P. & Raphael, B. 1995. *Ways Forward: National Aboriginal and Torres Strait Islander Mental Health Policy*. National Mental Health Strategy.