
Culture at the Centre of Closing the Gap

Submission to the Productivity Commission
Review of the National Agreement
on Closing the Gap 2026

PREPARED BY

Wes Morris

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Executive summary

The National Agreement on Closing the Gap gives culture a foundational place. It acknowledges that strong Aboriginal and Torres Strait Islander cultures are fundamental to improved life outcomes and commits the parties to implementing all activities under the Agreement in a way that “takes full account of, promotes, and does not diminish in any way” Aboriginal and Torres Strait Islander cultures. This commitment is not confined to Outcome 16. It applies across the National Agreement and is intended to be demonstrated through government Implementation Plans.¹

In the 2025 Social Justice Report, Aboriginal and Torres Strait Islander Social Justice Commissioner Katie Kiss carries that commitment further. The Report says that “culture is everything” and calls for “Genuine partnership and power-sharing which centres culture, community and Country and enables structural transformation”.²

The National Agreement has established culture as a whole-of-framework commitment, but not the policy process, institutional relationships or government architecture needed to give that commitment practical effect across diverse First Nations contexts. As a result, culture remains peripheral to the machinery through which priorities are set, responsibilities allocated, investment organised and governments held accountable. There is no coherent framework for understanding how government actions collectively contribute to strong, supported and flourishing cultures, or for holding each party accountable for its respective responsibilities.

The National Agreement says that culture is fundamental to improved outcomes, but it does not explain how that contribution is expected to occur, what supports it or how the parties will know whether their actions are strengthening or constraining culture.

These contradictions are the central concern of this submission.

1 National Agreement on Closing the Gap, Part 5, clauses 21–22.

2 Australian Human Rights Commission, A Fair and Just Future for First Peoples: Social Justice Report 2025 (2026), p. 17.

Giving this commitment practical effect requires more than reform within government. It requires a properly resourced process through which Aboriginal and Torres Strait Islander cultural organisations, community-controlled organisations and other First Nations institutions can shape a Cultural Policy and an enduring relationship with government.

This proposal builds on decades of First Nations advocacy for cultural rights, national representation and stronger cultural institutions. In 2023, the Close the Gap Campaign explicitly recommended that governments partner with Aboriginal and Torres Strait Islander peoples and communities to develop, fund and implement a dedicated Cultural Policy. This submission asks the Commission to recommend a practical pathway for progressing that existing call.³

Such a process would not seek one national definition of culture. First Nations cultures are plural, living and place-based. Different Nations, communities and organisations will bring different histories, relationships, responsibilities and priorities. The purpose is to create a policy process capable of responding to that diversity.

The ultimate purpose is more important than the machinery: First Nations cultures remain living, strong and capable of being carried forward on their own terms by the people, communities and Nations to whom they belong.

Future generations would inherit more than an Aboriginal identity or knowledge that culture once existed. They would inherit living languages, relationships with Country, knowledge, practice, responsibility, ceremony, stories, institutions and people able to teach and sustain them. Cultures would be able to change and grow without their continuity depending on short-term programs, individual champions or the priorities of a particular government.

Strong cultures are an outcome in their own right. The National Agreement succeeds only if future generations inherit cultures that are living, supported and able to flourish – not merely improved services delivered to Aboriginal and Torres Strait Islander people.

The failures in the current machinery are not principally failures of goodwill by current ministers, departmental leaders or officials. They reflect inherited systems of government that centralise authority, divide responsibility across portfolios and jurisdictions, and translate complex relationships into programs, contracts, consultation processes and indicators.

³ National Close the Gap Alliance Group 2023, Recommendation 8, p. 8, and Creative Australia 2022, *Bringing It Forward*.

Those systems can assign a program to a department, a budget to a branch and an outcome to a reporting framework. Culture does not organise itself in this way. It lives in who teaches a child a word or story; who carries responsibility for a place; who can speak for particular knowledge; how people care for Country; and how obligations are passed between generations. When government separates these relationships across portfolios and programs, it may support individual activities while losing sight of what holds them together.

Outcome 16 provides the clearest entry point into this problem. It states that “Aboriginal and Torres Strait Islander cultures and languages are strong, supported and flourishing”. Target 16, however, is entirely focused on language: “By 2031, there is a sustained increase in number and strength of Aboriginal and Torres Strait Islander languages being spoken.”⁴

Whilst language is foundational to culture, it is not the whole of culture. Importantly, the Languages Policy Partnership provides an important formal pathway for pursuing Target 16.

The Commonwealth also identifies broader cultural activity under its implementation of Outcome 16, including work to protect traditional knowledge and cultural expressions and the First Nations First pillar of the National Cultural Policy.⁵ Their inclusion confirms that the Commonwealth understands Outcome 16 as extending beyond language. It is extraordinary that culture – the commitment intended to underpin every part of the National Agreement – appears in the outcome but then largely disappears from the machinery beneath it. The target is exclusively about language, while the wider cultural promise has no dedicated target, established substantive indicators or agreed framework for assessing progress and accountability.

That said, the problem is not that government does nothing in relation to First Nations culture. Programs, funding commitments, partnerships and implementation activity exist across several portfolios. What is absent is an overarching First Nations Cultural Policy capable of connecting and guiding that activity. There is also no adequately resourced, community-controlled national First Nations peak body for the cultural sector, or equivalent institutional relationship capable of sustaining sector-wide engagement with government. Cultural activity therefore remains fragmented across separate programs, portfolios and reporting arrangements.

4 National Agreement on Closing the Gap, Table B, Outcome 16 and Target 16.

5 First Languages Australia, Languages Policy Partnership (2026); Closing the Gap, Table B, Outcome 16; Australian Government, Revive: A Place for Every Story, a Story for Every Place (2023).

Cultural activity is spread across government, but responsibility for culture as a whole sits nowhere.

One consequence is that the National Agreement still has no settled way of understanding whether its wider cultural promise is being realised. Work to develop that evidence base has begun but remains unfinished.

In March 2019, AIATSIS began developing what it describes as the first national report of its kind: an overview of the many facets of Aboriginal and Torres Strait Islander cultures and heritage. The intention was to inform stronger government support. Seven years later, AIATSIS's public webpage continues to describe the report as under development.

Separately, the Australian Government introduced *Measuring What Matters* in 2023 as Australia's national wellbeing framework. It recognises that economic and administrative measures alone do not provide a complete account of national progress, and that First Nations wellbeing is grounded in maintaining culture. Yet Closing the Gap still has no coherent pathway through which existing First Nations-led cultural evidence can shape policy, investment and accountability.⁶

The overarching recommendation advanced here is drawn from the 2025 Social Justice Report: **a genuine partnership and power-sharing arrangement which centres culture, community and Country across Closing the Gap.**

The recommendation tells us what kind of relationship is needed, but not what it would look like in practice. First Nations people need the time, resources and process to work that out in genuine partnership with government.

The Commission has seen this problem before:

“Government funding agencies in particular seemingly find it difficult to fit the Project’s culturally- based model into any of their boxes.”⁷

— Gary Banks, then Chair of the Productivity Commission, 2012

⁶ Australian Institute of Aboriginal and Torres Strait Islander Studies, Report on the Situation and Status of Indigenous Cultures and Heritage, webpage last updated 28 October 2025; Australian Government, *Measuring What Matters: Australia's First Wellbeing Framework* (July 2023), p. 17.

⁷ Banks, G 2012, 'Elders bring new hope to the Kimberley', *Reconciliation News*, Issue No. 25, December 2012, pp. 8–9.

Former Productivity Commission Chair Gary Banks wrote those words about the Yiriman Project in 2012. Yiriman did not fit neatly within one government portfolio because culture was not one component of its work. Culture was the basis upon which the work was organised.

Fourteen years later, the formal language of public policy has changed. Closing the Gap now recognises culture as foundational. But the administrative problem identified by Banks remains. Culture crosses the funding categories and portfolio boundaries through which government allocates responsibility, investment and accountability.

A First Nations-led process, with the time and resources required to develop a Cultural Policy or Plan, provides a practical place to begin. Cultural leaders, cultural organisations, community-controlled organisations and other relevant First Nations institutions could also consider whether a national cultural organisation or representative mechanism is required and, if so, what role it would perform.

Questions about its governance, constituency and relationship with existing organisations remain for First Nations people to determine.

The Productivity Commission does not need to settle those questions. It can identify the missing cultural policy pathway as a structural barrier, recommend changes to government's own systems and recommend that the parties resource the First Nations-led process required to develop the response.

Recommendations

The National Agreement already commits its parties to partnership, shared decision-making and the recognition of culture. The issue identified in this submission is not the absence of those commitments. It is the absence of a coherent policy and institutional pathway through which they can be given practical effect across the breadth of First Nations culture.

This submission invites the Productivity Commission to find that this missing pathway is a structural barrier to implementing the National Agreement as a whole.

The overarching recommendation is drawn from the 2025 Social Justice Report:

“Genuine partnership and power-sharing which centres culture, community and Country and enables structural transformation is critical.”

The recommendations below identify how work towards that relationship could begin. They do not prescribe a national definition of culture, the content of a Cultural Policy, the form of a representative body or a set of national cultural indicators. Those questions belong within a properly resourced First Nations-led process.

The Productivity Commission is invited to recommend that the parties to the National Agreement:

1. Resource a First Nations-led process to develop an overarching First Nations Cultural Policy or Plan.

The process would involve cultural leaders, cultural organisations, Aboriginal and Torres Strait Islander community-controlled organisations and other relevant First Nations institutions. It would determine the policy's scope, priorities, governance and implementation, and how the National Agreement's whole-of-framework commitment to culture can be given practical effect.

As part of that work, the process could consider the future role of Outcome 16 and its relationship with the Languages Policy Partnership, work to protect traditional knowledge and cultural expressions, the First Nations First pillar of Australia's National Cultural Policy and cultural responsibilities carried across other parts of the National Agreement.

Dedicated and sufficient resourcing would allow participating organisations to undertake the community engagement, deliberation and policy work required.

2. Through that process, develop proposals for an enduring partnership and institutional relationship with government across the breadth of First Nations culture.

This would include First Nations-led consideration of whether a national cultural organisation, body or representative mechanism is required and, if so, what purpose it would serve and what form it might take. Its governance, constituency, authority and relationship with existing First Nations organisations remain matters for First Nations people to determine.

3. Require each government party to map and examine its responsibilities, programs and expenditure relating to First Nations culture.

This work would identify what is currently funded, what cultural work remains unrecognised or unsupported, where responsibility falls between portfolios and jurisdictions, and how investment contributes to the National Agreement's cultural commitment. It would also examine whether current administrative, funding and accountability systems can respond coherently to a First Nations Cultural Policy.

4. Develop an approach to cultural evidence and accountability through the Cultural Policy process.

This work would clarify the status of AIATSIS's *Report on the Situation and Status of Indigenous Cultures and Heritage* and consider how that work could be completed or renewed. It would also consider how First Nations culture is reflected in *Measuring What Matters*.

The process would determine what can appropriately be understood nationally, what requires local interpretation, what does not belong in public datasets and how Indigenous Data Sovereignty applies. It would distinguish evidence about the strength and continuity of living cultures from accountability for the actions within the control of governments and other parties.

These recommendations are connected. The Cultural Policy process is the place to begin. It would give First Nations people the time and resources to consider what an enduring relationship with government across the breadth of culture could look like. Government, meanwhile, has work of its own to do: understanding where responsibility and investment currently sit, addressing the gaps between portfolios and connecting cultural evidence with decisions and accountability.

Why is this needed? Because Closing the Gap contains a fundamental contradiction. It recognises culture as foundational to the entire National Agreement, yet culture remains peripheral to the systems through which the Agreement is put into practice.

Decades of advocacy for culture

Recognition, cultural wellbeing and national representation have long been advocated. An explicit cultural policy recommendation followed in 2023.

- 1973** ● **National cultural advocacy**
 The first national summit of First Nations artists forms part of the history of cultural rights advocacy documented in *Bringing it Forward*.
- 1989** ● **Culture and wellbeing**
 The National Aboriginal Health Strategy recognises the social, emotional and cultural wellbeing of the whole community.
- 2008–09** ● **National cultural infrastructure**
 A proposal for a national arts and cultural body brings together representation and protection of Indigenous Cultural and Intellectual Property.
- 2014** ● **Cultural transmission**
 Mick Gooda highlights the imbalance between Western education and access to traditional cultural knowledge in *The Elders' Report*.
- 2020** ● **Recognition and institutional change**
 June Oscar connects the denial of Indigenous societies and knowledge systems with continuing marginalisation and structural discrimination.
- 2023** ● **An explicit cultural policy call**
 Recommendation 8 of the *Close the Gap Campaign Report* calls for governments to partner with First Nations peoples and communities to develop, fund and implement an Aboriginal and Torres Strait Islander cultural policy.

2020 • June Oscar • Bunuba

“As First Australians, Aboriginal and Torres Strait Islander peoples have a remarkable living history. For 60,000 years plus we have sustained a cohesive and resilient society. We have the most extensive kinship network in the world and through a system of law, ceremony and song we have transferred a huge body of knowledge, including important principles of collective and common humanity, from generation to generation. There is much to celebrate but it is not celebrated – it is not even recognised.”

The Guardian, 2020

2022 • Bringing it Forward

“While previous generations have fought for life and for land, and this must and will continue, this must also be the time to fight for the centrality of our culture, because it is in the elevation and celebration of this most sacred practice that our wellbeing and Country flourish. First Nations arts and culture often get overlooked in the context of other needs resulting from intergenerational trauma, but our arts and culture give us our strength, our foundation, our identity, our hope; they give us our connection, our healing, our pride, our wellbeing.”

Bringing it Forward, 2022, p. 7

Selected milestones, not a complete history.

Sources: *Bringing it Forward* (2022); National Aboriginal Health Strategy (1989); *The Elders' Report* (2014); June Oscar, *The Guardian* (2020); *Close the Gap Campaign Report* (2023), p. 8. Quotations compiled in Wes Morris, *Cultural Resilience is Key to First Nations Wellbeing — Productivity & Prevention Through Culture* (2025), p. 19.

1. Culture is everything and yet remains peripheral

Australia no longer lacks formal recognition of the importance of First Nations culture. The National Agreement acknowledges that strong Aboriginal and Torres Strait Islander cultures are fundamental to improved life outcomes. It commits the parties to implementing all activities under the Agreement in a way that “takes full account of, promotes, and does not diminish in any way” Aboriginal and Torres Strait Islander cultures. It says that culture will be prioritised through the four Priority Reforms and demonstrated through government Implementation Plans.⁸

This recognition now appears across several national frameworks. Outcome 16 gives it its clearest expression, committing Australia to a future in which “Aboriginal and Torres Strait Islander cultures and languages are strong, supported and flourishing”. The National Cultural Policy carries that recognition into arts and cultural policy through its First Nations First pillar. The 2025 Social Justice Report goes further by explaining why culture belongs at the centre: it is foundational to identity, community strength and the future of First Peoples.

The 2025 Social Justice Report develops its argument for centring culture through the metaphor, “Rebuilding the Village”. The village is not a single place or institution. It describes the relationships, knowledge, authority and collective responsibilities through which First Nations cultures and communities sustain life. The Report identifies kinship and cultural relationality, self-determination in accordance with cultural ways of being, connection to Country and community, Indigenous Law and conceptions of justice, nation building, and cultural and linguistic continuity as foundations for rebuilding cultural and community strength.

First Nations peoples have been making this argument for generations. Culture is not only a means of improving health, education or other socioeconomic outcomes. Cultural continuity is a right, a source of collective identity and responsibility, and an outcome in its own right. Cultural organisations, community-controlled institutions, Elders and cultural leaders have built practical responses while repeatedly calling for cultural rights, sustained investment, stronger infrastructure, national representation and a more coherent relationship with government.

⁸ National Agreement on Closing the Gap, Part 5, clauses 21–22.

The timeline preceding this section illustrates that history. Within it, the 2023 Close the Gap Campaign Report, *Strong Culture, Strong Youth: Our Legacy, Our Future*, makes an explicit recommendation for a dedicated Aboriginal and Torres Strait Islander Cultural Policy. Recommendation 8 calls for governments to develop, fund and implement that policy in partnership with Aboriginal and Torres Strait Islander peoples and communities. Its proposed scope extends beyond the arts to cultural governance, maintenance and revitalisation, protection of culturally significant places, and the participation of cultural knowledge holders in decisions affecting communities.⁹ The Cultural Policy process proposed here would build on that existing recommendation, with its scope, governance and implementation determined through First Nations-led deliberation.

In my response to the 2025 Productivity Commission’s *Delivering Quality Care More Efficiently*, I brought together a consistent public record. It drew upon the words of June Oscar, Djambawa Marawili, Mick Gooda and First Nations-led research, alongside the *Bringing It Forward* report, to show that the centrality of culture has been stated repeatedly and over many years. The unresolved question is not whether First Nations people have made the case. It is why public policy has not yet built the structures needed to act upon it.¹⁰

The First Nations-led consultations recorded in *Bringing It Forward* expressed the argument plainly: *“While previous generations have fought for life and for land, and this must and will continue, this must also be the time to fight for the centrality of our culture, because it is in the elevation and celebration of this most sacred practice that our wellbeing and Country flourish. First Nations arts and culture often get overlooked in the context of other needs resulting from intergenerational trauma, but our arts and culture give us our strength, our foundation, our identity, our hope; they give us our connection, our healing, our pride, our wellbeing.”*¹¹

Read alongside the National Agreement, the 2025 Social Justice Report presents Closing the Gap with a direct challenge. The question is no longer whether culture belongs within the framework. The Agreement has already answered that. **The question is how its commitment is carried into policy, investment, institutional relationships and government accountability.**

⁹ National Close the Gap Alliance Group 2023, Recommendation 8(a–g), p. 8.

¹⁰ Wes Morris, *Cultural Resilience is Key to First Nations Wellbeing: Productivity & Prevention Through Culture*, individual response to the Productivity Commission’s *Delivering Quality Care More Efficiently Interim Report* (15 September 2025), pp. 19–21.

¹¹ Creative Australia, *Bringing It Forward: Report of Consultations Concerning a National Indigenous Arts and Cultural Authority* (2022), p.7.

The report provides the central recommendation advanced by this submission:

“Business-as usual is not an option. Genuine partnership and power-sharing which centres culture, community and Country and enables structural transformation is critical.”¹²

Who within government is responsible for seeing the whole? Through what relationships can cultural leaders, cultural organisations, community-controlled organisations and other Aboriginal and Torres Strait Islander institutions contribute their different knowledge and experience? How can those contributions shape policy without being collapsed into a single government definition of culture? And how can governments demonstrate that their actions are promoting rather than diminishing cultural strength?

Together, the current arrangements do not provide a coherent answer. Culture appears throughout policy as a source of identity, resilience, wellbeing, healing and social connection. It is invoked in health, education, justice, child and family policy, environmental management, heritage, languages and the arts. The organisations, people, work and infrastructure that sustain culture are spread across those same portfolios. Each portfolio may support one part of the picture, but no overarching framework brings government responsibility for the whole into view.

The result is a policy paradox. Governments recognise culture rhetorically and draw upon its protective and restorative effects, while the machinery governing policy, investment and accountability leaves it at the edges. Culture enters when a program seeks better engagement, cultural safety or improved outcomes. It rarely has a substantive place in determining policy priorities, investment or the meaning of success.

Outcome 16 makes the policy gap visible, but its effects extend across the National Agreement. The absence of an overarching cultural policy affects how governments form partnerships, support community-controlled organisations, coordinate their own responsibilities and use evidence. The four Priority Reforms provide an existing framework for examining those consequences.

¹² Australian Human Rights Commission, *A Fair and Just Future for First Peoples: Social Justice Report 2025 (2026)*, p. 17.

That requires something more durable than goodwill or a series of individual consultations. It requires a policy framework and an established relationship that can continue across funding cycles, departmental changes and changes of government. The National Agreement contains important parts of that relationship, including its formal policy partnerships. It does not yet provide a complete pathway for the breadth of culture.

2. Centring culture requires a policy framework capable of responding to cultural diversity

Giving practical effect to the 2025 Social Justice Report's call does not require a single national definition of culture. Australia is home to hundreds of First Nations groups, each with distinct Law, language, identity, authority and relationships to Country. Culture is dynamic as well as enduring. It is expressed through language, ceremony, art, story, knowledge, kinship, governance, responsibility, caring for Country and everyday life. The Australian Human Rights Commission's *Declaration Dialogue* paper describes culture as encompassing ways of being, knowing and doing, and as the foundation of individual and collective identity.¹³

No single national definition can contain this diversity, and no single government portfolio can respond to its full breadth. Arts policy, heritage protection, language revitalisation, caring for Country, education, health and community development each engage with aspects of culture. None, on its own, provides a complete policy home.

This complexity is sometimes treated as a reason why coherent cultural policy is impossible. In practice, it points to the need for a different kind of policy process: one led by First Nations people, capable of engaging with different cultural contexts and sufficiently resourced to allow genuine deliberation.

A First Nations-led process would not seek one answer from one organisation and apply it nationally. If Aboriginal and Torres Strait Islander people across Australia were asked what culture means, what places it under pressure and what support it requires, the answers would differ according to Country, history, community, cultural continuity and present circumstances. **Those differences are not an obstacle to policy. They are part of the reality to which policy needs to respond.**

¹³ Australian Human Rights Commission, Ensuring the Ongoing Survival of the Oldest Living Culture in the World, Declaration Dialogue Series Paper No. 4 (2013).

Nor does responsibility sit only with organisations labelled as cultural organisations. Aboriginal and Torres Strait Islander community-controlled organisations work within communities every day across health, housing, education, media, family support and other areas.

Many sustain cultural relationships and practices as part of that work, understand how government systems affect their communities and have established forms of community accountability. Their experience belongs within the policy process, alongside cultural organisations, Traditional Owners, Elders, cultural leaders, specialist bodies and other First Nations institutions.

Participation would not give every organisation the same role or assume that any organisation speaks for every cultural matter. The design of the process would need to recognise different relationships, responsibilities, constituencies and forms of knowledge. Its purpose would be to create enough space and structure for those differences to shape policy, rather than asking government to resolve them through a universal definition.

Centring culture therefore means more than giving culture a substantive place in the policy, investment and accountability arrangements of Closing the Gap. It also means establishing a process through which different First Nations cultural contexts and organisational experience can inform those arrangements.

Government cannot achieve this by adopting one definition, consulting one organisation or adding another program. It can resource the relationships and processes through which a more coherent policy is developed, while reforming its own systems so that it can respond.

Professor Taiaiake Alfred offers a useful test for whether policy begins in the right place. First Nations peoples begin by asking what they need to do to *‘survive and persist into the future as collectivities’*. *Government can then ask:*

- what it is doing to impede that continuity,
- what it is doing to support it, and
- how the resources at its disposal could allow it to happen ‘in a better and deeper and stronger way’.

This places the continuity of First Nations peoples and cultures - not the administrative program – at the centre of the policy question.¹⁴

Alfred also warns that Indigenous resurgence can be narrowed into ‘cultural resurgence’ when culture is separated from land, responsibility, nationhood and structural reform. Culture may then be welcomed into existing institutions while the underlying arrangements of authority remain substantially unchanged. That warning goes to the heart of the distinction between recognising culture and allowing culture to shape the purpose and operation of policy.

This submission does not prescribe the form of that relationship. Questions about representation, governance, cultural authority and relationships with Nations, communities and existing organisations require careful First Nations-led consideration. The immediate question for government is whether it will resource that work and create the conditions through which its outcomes can influence public policy.

3. Why government recognition of culture has not changed how power operates

Governments now recognise the importance of culture more clearly in policies, frameworks and public commitments. But that recognition has not been matched by equivalent changes to the systems through which decisions are made, resources are allocated and governments are held accountable.

This is not best explained by deliberate resistance from current ministers, departmental leaders or officials. Many people within government recognise the problem and are seeking better outcomes. The difficulty is that they work through inherited systems with their own operating logic:

- authority is centralised;
- responsibility is divided;
- funding is attached to portfolio objectives;
- accountability moves upward through departments; and
- complex relationships are translated into administratively manageable programs, contracts and indicators.

¹⁴ Taiaiake Alfred, Indigenous Resurgence and State Responses in North America, keynote address to the AIATSIS Culture and Policy Symposium, 6 March 2019.

These characteristics are not inherently malicious. They are, however, poorly suited to the breadth, diversity and relational nature of First Nations cultures. Government often treats cultural policy as a technical coordination problem for which responsibilities, programs and measures can be standardised. This is akin to laying an organisational chart over Country and expecting the living system beneath it to conform to the administrative boundaries above. The chart can determine which agency controls a program or budget. It cannot describe or organise the cultural relationships and responsibilities already present.

AIATSIS identified this problem in 2019. Its Culture and Policy Workshop paper observed that Indigenous engagement with policy and programs occurs through ‘siloes and segmented sectors’ and that the resulting patchwork often fails to recognise the relationships between Country, culture, health and other areas of life. It warned that reporting can miss essential elements of culture or impose narrow conceptions of what culture is. The systems problem described in this submission is therefore not new. What remains absent is a policy and institutional pathway capable of responding to it.¹⁵

The problem is not simply that government misunderstands culture. Government generally acts through established structures, and those structures translate culture into administratively recognisable forms:

- Partnership can narrow into consultation.
- Relationships can become stakeholder engagement.
- Cultural continuity can become a program output.
- Cultural organisations can be treated principally as delivery partners.
- Even where policy is co-designed, existing portfolio mandates, funding rules and accountability systems continue to shape what can be proposed and carried through.

Unless those underlying settings also change, partnership can repeatedly be drawn back to consultation and administration.

Government systems are often better at recognising the harm that follows cultural disruption than at recognising and supporting culture as a living system in its own right. Disruption becomes visible as disadvantage, risk, poor health, low engagement, language loss or demand for services.

¹⁵ Australian Institute of Aboriginal and Torres Strait Islander Studies, AIATSIS Culture and Policy Workshop, 7 March 2019, pp. 1–2.

Government can then assign the problem to a portfolio, fund an intervention and measure the result. Culture enters as a protective factor or response after harm has occurred, rather than shaping the earlier decisions about policy purpose, investment and accountability.

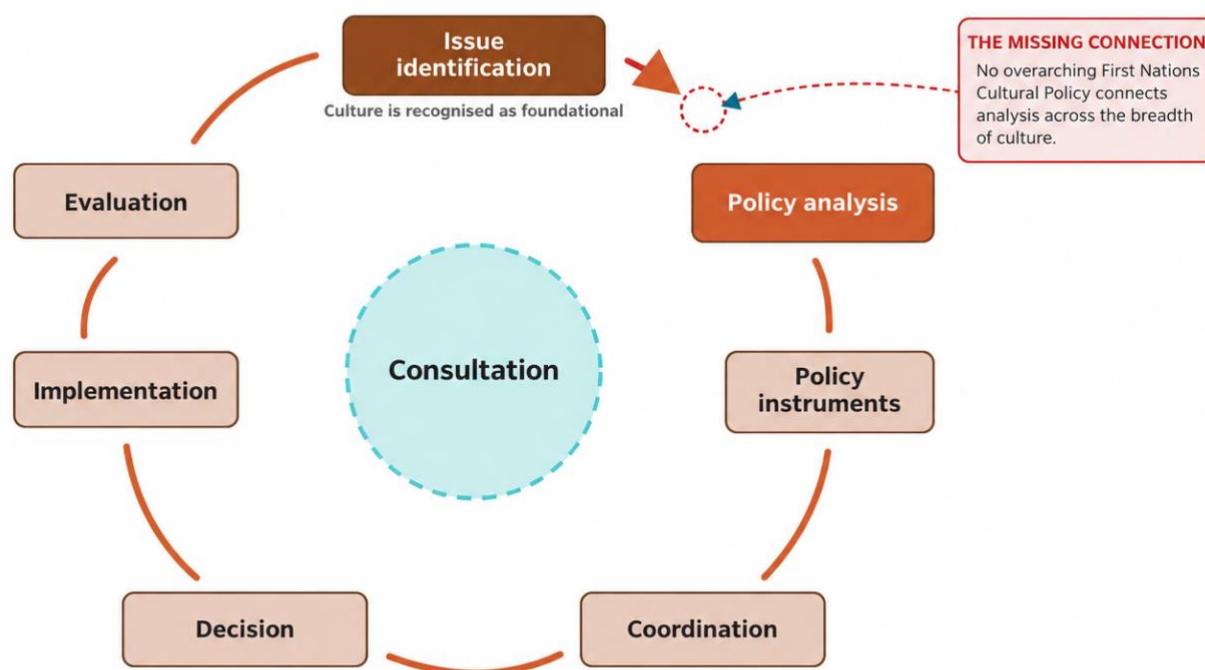
Cultural strength does not fit neatly into that model. It may lie in relationships between people, Country, language, Law, knowledge, ceremony and responsibility - relationships that cross portfolios and are not always visible through government data.

This is why cultural work repeatedly falls between portfolios. Each part of government can identify activity within its own mandate while responsibility for the cultural system as a whole remains institutionally homeless.

The Productivity Commission's own policy-cycle model helps illustrate where the cultural commitment currently breaks down.

For culture, the policy cycle remains incomplete

Culture is recognised as foundational. Existing policies and programs address parts of culture, but no overarching First Nations Cultural Policy connects them across a coherent policy cycle.



What the adaptation shows: Closing the Gap recognises culture as foundational. Policies, programs and analysis already exist, but no overarching First Nations Cultural Policy connects them across the breadth of culture. The gap is a coherent framework linking policy analysis, coordination, decisions, implementation and evaluation.

Figure 1. Adaptation of the Australian policy cycle presented in the Productivity Commission’s call for submissions. Culture is identified as foundational, but no overarching First Nations Cultural Policy carries that recognition into policy analysis and through the subsequent policy cycle.

4. Outcome 16 exposes the missing cultural policy pathway

The National Agreement’s cultural commitment applies across Closing the Gap. Outcome 16 provides the clearest place to examine how that commitment has been translated into policy. It states that: “Aboriginal and Torres Strait Islander cultures and languages are strong, supported and flourishing.” The target beneath it is entirely about language: “By 2031, there is a sustained increase in number and strength of Aboriginal and Torres Strait Islander languages being spoken.”¹⁶

¹⁶ National Agreement on Closing the Gap, Table B, Outcome 16 and Target 16.

Language is foundational. It carries knowledge, identity, history and ways of understanding and relating to Country. The Aboriginal and Torres Strait Islander Languages Policy Partnership provides a formal relationship through which First Nations representatives and governments work together on Target 16. Its work is an important part of the Closing the Gap architecture and provides a pathway for strengthening languages.

The Languages Policy Partnership cannot reasonably be expected to carry national policy responsibility for the full breadth of living First Nations cultures. Its objectives, priorities and projects properly reflect the language target it was established to pursue.¹⁷

The Commonwealth also identifies broader cultural activity under its implementation of Outcome 16. This includes work towards stand-alone legislation to protect First Nations traditional knowledge and cultural expressions, and implementation of the First Nations First pillar of the National Cultural Policy.

These are significant initiatives. Work on traditional knowledge and cultural expressions has involved dedicated funding, a First Nations Expert Working Group, community consultation and an associated grant program. The National Cultural Policy has established a First Nations Board within Creative Australia and supports investment in First Nations languages, arts, creative practice, cultural institutions and the cultural economy.¹⁸

Their inclusion confirms that the Commonwealth understands Outcome 16 as extending beyond language. The limitation is not an absence of activity, funding or commitment. It is that this work remains organised through separate policies, programs, portfolios and reporting arrangements.

The formal target and indicators are language-specific. They do not explain how the broader cultural initiatives identified under Outcome 16 work together, what collective cultural change they are intended to support or who is accountable for the cultural responsibilities that fall between portfolios. Government can report what has been funded, established or delivered without providing a coherent account of whether its actions collectively support the promise that cultures are *strong, supported and flourishing*.¹⁹

¹⁷ First Languages Australia, Languages Policy Partnership (2026); First Languages Australia, Languages Policy Partnership Priorities Update (2025).

¹⁸ Australian Government, Office for the Arts, Protecting First Nations Traditional Knowledge and Traditional Cultural Expressions (2026); Creative Australia, First Nations Board (2026); Australian Government, Revive: A Place for Every Story, a Story for Every Place (2023).

¹⁹ Closing the Gap, Table B: Outcome 16, indicators and data development provisions.

Culture also reaches beyond the current initiatives. Cultural strength includes whether cultural organisations are sustainable; whether cultural work and intergenerational transmission are supported; whether people can practise culture and maintain relationships with Country; and whether government decisions across different portfolios strengthen or constrain cultural continuity.

This does not mean every dimension of culture requires a national indicator. Some aspects of cultural strength require local interpretation. Some cultural knowledge does not belong in public datasets. Before further indicators are developed, there needs to be a clearer policy purpose: what Outcome 16 is seeking to achieve beyond language, how that work will be pursued and what governments will be accountable for changing.

Work towards a broader national account of culture has already begun. In March 2019, AIATSIS convened a Culture and Policy Workshop to support development of a framework for reporting on the status of Aboriginal and Torres Strait Islander culture and heritage. The workshop asked how the interconnectedness of otherwise segmented policy and program areas could be revealed; whether a common vocabulary could be created across communities, organisations and governments; and how information about culture could assess, critique and inform government policy and program design.²⁰

AIATSIS's public webpage says development of the national report began through that process in March 2019. It describes the proposed report as the first of its kind and as a source of information intended to support stronger government action. Seven years later, the webpage continues to describe the report as under development.²¹

The significance is greater than delay in one research project. The questions identified in 2019 remain unresolved within Closing the Gap: what aspects of cultural strength need to be understood; how their interdependence can be recognised; how evidence can inform policy without imposing a narrow national definition; and who carries responsibility for acting on what is learned. The difficulty is not an absence of insight or preliminary work. It is the absence of an enduring policy and institutional pathway capable of carrying that work through to decisions, investment and accountability.

²⁰ Australian Institute of Aboriginal and Torres Strait Islander Studies, *AIATSIS Culture and Policy Workshop*, 7 March 2019, pp. 1–2.

²¹ Australian Institute of Aboriginal and Torres Strait Islander Studies, Report on the Situation and Status of Indigenous Cultures and Heritage, webpage last updated 28 October 2025.

This distinction has been identified before. In 2019, Jon Altman argued that what was urgently needed was “a new policy framework, not a new evaluation framework”.²² Outcome 16 demonstrates why that distinction matters. Further indicators may improve the description of cultural conditions, but they cannot provide the missing policy purpose, establish who is responsible for acting or connect the evidence to decisions and investment.

The National Agreement says that governments will demonstrate their commitment to culture through their Implementation Plans. The Commonwealth’s 2026 Implementation Plan shows both the extent of government activity and the remaining policy gap.

Under the combined heading Connection to Country, Culture and Languages, the Plan reports work concerning Indigenous Rangers, Indigenous Protected Areas, Native Title records, language revitalisation and education, the Ngurra Cultural Precinct, biosecurity, disaster resilience and remote-community infrastructure. Culture also appears elsewhere through education, employment, justice, family safety, aged care and other policy areas.²³

These are important investments, and some are substantial. They show that culture extends well beyond arts and language. But the Plan does not explain how these separate activities fit together, what they are collectively trying to achieve or how First Nations cultural leaders and organisations can shape priorities across them. Nor does it explain how their overall contribution to strong, supported and flourishing cultures will be assessed. The formal target under Outcome 16 remains entirely about language. Other cultural work is managed and reported separately through individual programs.²⁴

A First Nations Cultural Policy process would provide a place to develop that missing pathway. It could build upon existing initiatives, clarify how different parts of government contribute to cultural strength and continuity, identify the gaps between portfolios and consider what governments are accountable for changing. It could also examine what evidence is useful nationally, what requires local interpretation and how Indigenous Data Sovereignty applies.

²² Jon Altman, *A Submission to the Productivity Commission on the Review of the National Agreement on Closing the Gap Draft Report*, Submission 51, Productivity Commission, 6 October 2023, p. 1.

²³ Australian Government, *Commonwealth Closing the Gap 2025 Annual Report and Commonwealth Closing the Gap 2026 Implementation Plan* (2026), pp. 22–69, especially pp. 64–69.

²⁴ Australian Government, *Commonwealth Closing the Gap 2025 Annual Report and 2026 Implementation Plan* (2026), pp. 64–70.

This submission does not propose a finished definition of culture, a predetermined institutional model or a national set of cultural indicators. It proposes a properly resourced First Nations-led process through which cultural leaders, cultural organisations, community-controlled organisations and other First Nations institutions can consider those questions.

5. **Genuine partnership and power-sharing require an enduring relationship**

The 2025 Social Justice Report's call for genuine partnership and power-sharing describes the relationship required to give the National Agreement's cultural commitment practical effect. It does not prescribe a finished institutional model, and neither does this submission. A Cultural Policy provides a practical place to begin, but a policy alone will not establish an enduring relationship between First Nations cultural leaders, organisations and governments.

Leaving the final institutional model open does not mean leaving government without a starting point for engagement. The Indigenous Art Centre Alliance (IACA) provides an established example of First Nations-led sector representation and governance. Its majority First Nations board includes artists, arts workers and art centre managers, and its member art centres are required to have First Nations-led boards or advisory bodies.²⁵ Government should engage directly with IACA and other established art and cultural peak bodies, including Arnhem Northern and Kimberley Artists (ANKA), Desart, The Aboriginal Art Centre Hub of Western Australia (AACHWA) and Ku Arts, alongside cultural organisations such as the Kimberley Aboriginal Law and Culture Centre (KALACC) and the cultural leaders and custodians whose responsibilities extend beyond organisational boundaries. These participants bring different constituencies, mandates and experience. Their involvement would provide a grounded starting point for policy development without assuming that any one organisation represents the full breadth of First Nations culture.

Importantly, working with a First Nations organisation does not, by itself, mean that power has been shared or that culture has shaped the policy. First Nations organisations may participate as service providers, sector representatives or policy partners within arrangements whose purpose, scope, funding and final authority remain largely determined by government.

²⁵ Indigenous Art Centre Alliance 2026, 'IACA Board'.

Jon Altman makes the distinction plainly: majority representation cannot be equated with majority power.²⁶

The test is not only whether First Nations organisations have a seat at the table. It is whether cultural knowledge, relationships and responsibilities can influence what the policy is for, how the problem is understood, where resources are directed and what a successful response looks like.

Government does not need to understand every First Nations culture before it can enter such a relationship. A marriage does not depend upon either person fully comprehending the other. It depends upon commitment, respect, reciprocal responsibility and ways of navigating difference. Governments can make the same commitment while recognising that First Nations cultures are plural, that knowledge is held differently and that the arrangements themselves require First Nations-led design.

The four Priority Reforms do not provide the missing cultural policy or institutional relationship. They do, however, identify the areas in which change is required: formal partnership and shared decision-making, stronger community-controlled sectors, transformation within government, and access to data and information. The following section considers what the cultural policy gap means for each of those reforms.

Priority Reform One: Formal partnerships and shared decision-making

The cultural policy gap: no equivalent national partnership across the breadth of First Nations culture

The Languages Policy Partnership demonstrates the value of a formal relationship around a defined policy area. It brings First Nations representatives and governments together under Priority Reform One and provides a pathway for national work on languages and Target 16.

²⁶ Jon Altman, *A Submission to the Productivity Commission on the Review of the National Agreement on Closing the Gap Draft Report*, Submission 51, Productivity Commission, 6 October 2023, p.2.

The question raised by this submission is what sits alongside that work for the wider cultural commitment in Outcome 16. No equivalent Priority Reform One partnership is identified within the current national Closing the Gap architecture as being dedicated to policy across the full breadth of First Nations culture.²⁷

A First Nations Cultural Policy process could provide the immediate forum for that work. Consideration of a national cultural organisation or representative mechanism could then determine whether a more enduring institutional relationship is required.

The form of any arrangement remains a matter for First Nations-led deliberation. What is already apparent is the need for continuity, policy capability and a way for governments to engage with cultural questions that extend beyond any single consultation or portfolio.

Priority Reform Two: Building the community-controlled sector

The cultural policy gap: cultural organisations are not recognised and strengthened through a coherent sector-wide framework

Priority Reform Two recognises that community-controlled sectors need reliable funding, infrastructure, skilled workforces and strong peak bodies. Sector Strengthening Plans have been developed or identified for several priority sectors, including Aboriginal and Torres Strait Islander languages. There is no equivalent national plan for strengthening First Nations cultural organisations across the broader arts and cultural sector.²⁸

Cultural work is carried by art and culture centres, language centres, archives, keeping places, media organisations, ranger groups and on-Country initiatives. It is also carried through many Aboriginal community-controlled organisations working in health, housing, education, family support and other areas. But funding an Aboriginal organisation to deliver a service does not necessarily fund the cultural knowledge, relationships and responsibilities that support its work. Cultural organisations also struggle when funding is tied to short-term projects rather than the people, infrastructure and long-term work needed to sustain culture.

²⁷ National Agreement on Closing the Gap, Priority Reform One; First Languages Australia, Languages Policy Partnership (2026). The conclusion is based on the partnerships identified within the published national Closing the Gap architecture.

²⁸ National Agreement on Closing the Gap, Priority Reform Two, clauses 45 and 49–54.

These organisations have different purposes and responsibilities and cannot be treated as one uniform sector. A Cultural Policy could make their different contributions visible, identify work that falls between government portfolios and consider what long-term support is needed. A national cultural organisation or representative mechanism could strengthen policy capability and coordination without replacing existing organisations or their mandates.

The question of national cultural representation has a substantial history. *Bringing It Forward*, traces First Nations advocacy for cultural rights and national representation back to 1973 and documents the 2018–19 consultations on a National Indigenous Arts and Cultural Authority (NIACA). Those consultations demonstrated strong support for a national body while identifying questions about its purpose, scope and relationship with existing organisations that require further First Nations-led deliberation.²⁹ Priority Reform Two provides a framework for recognising and resourcing this existing work. Section 7 returns to these questions in considering Purrrumpa 2027 and the opportunity to carry that work forward.

Priority Reform Three: Transforming government organisations

The cultural policy gap: no part of government is responsible for seeing the whole

Culture crosses the boundaries of government. It is connected to health, education, justice, language, heritage, the arts, Country, family, employment and community wellbeing. Each portfolio approaches the part relevant to its own work. Health may see culture as contributing to wellbeing; education through language and identity; environment through caring for Country; heritage through protection; and arts policy through cultural expression. All these perspectives matter.

The problem is that no part of government is responsible for seeing how they connect. Without a cultural policy home, culture is repeatedly redefined according to the portfolio dealing with it.

The Productivity Commission identified a similar problem in the care economy. It found that prevention produces benefits across several portfolios and levels of government, often over many years, while funding decisions remain divided by portfolio boundaries and short-term budgets. It recommended a national framework to connect purpose, responsibility, funding and accountability.³⁰ Culture presents a comparable coordination problem, although the policy and governance response needs to be designed for culture.

²⁹ Creative Australia 2022, *Bringing It Forward: Report of Consultations Concerning a National Indigenous Arts and Cultural Authority*.

³⁰ Productivity Commission, *Delivering Quality Care More Efficiently*, Inquiry Report (December 2025), pp. 5–6 and 57–78.

The Commonwealth's 2026 Implementation Plan shows how this plays out. Girringun Rangers use cultural knowledge and connection to Country to strengthen biosecurity surveillance. Their work protects Country, agricultural exports and cultural heritage while creating employment, training and opportunities for cultural connection. The Plan recognises that the program contributes to employment, economic development and culture.³¹

Government can count the surveillance, jobs and environmental work through separate programs. What remains less visible is the cultural knowledge, relationships and organisations that make those results possible, and who is responsible for sustaining them. Fourteen years after Gary Banks observed that government could not fit Yiriman's culturally based model into its funding "boxes", Girringun reveals the same underlying problem.

A First Nations Cultural Policy and an identifiable policy home would not place First Nations culture under government control. They would help government coordinate its own responsibilities, investment and accountability across portfolios while maintaining an ongoing relationship with First Nations cultural organisations and leaders. This is the practical work of Priority Reform Three: changing government systems so they can recognise and respond to culture as a whole.

Priority Reform Four: Shared access to data and information at a regional level

The cultural policy gap: cultural evidence needs community authority and a pathway into action

Priority Reform Four concerns whether Aboriginal and Torres Strait Islander people can access locally relevant information and use it to set priorities and monitor progress. Culture makes this more complex. A national figure may show a broad trend, but it cannot necessarily explain what cultural strength means for a particular Nation or community.

Cultural evidence gains its meaning from place, relationships and context. Some evidence is useful locally but loses meaning when standardised nationally. Some cultural knowledge does not belong in a public dataset at all. First Nations people and organisations therefore need access to relevant information and authority over how cultural evidence is collected, interpreted and used.

³¹ Australian Government, *Commonwealth Closing the Gap 2025 Annual Report and Commonwealth Closing the Gap 2026 Implementation Plan* (2026), p. 66.

The Outcome 16 data framework and the Languages Policy Partnership provide important evidence about languages. Language is fundamental to culture, but it cannot stand as a national measure of First Nations cultures in their full breadth. A Cultural Policy process could consider what evidence is useful nationally, what requires local interpretation, what information communities need from government and what knowledge requires protection.

Existing cultural evidence has no clear pathway into policy

Australia is not starting from nothing. AIATSIS began developing a national framework for reporting on the strength and status of First Nations cultures and heritage in 2019. *Measuring What Matters*, Australia's national wellbeing framework, recognises that economic and administrative measures alone do not provide a complete account of progress and that First Nations wellbeing is grounded in culture.³²

The Mayi Kuwayu National Study also shows that cultural evidence can be developed across different First Nations contexts without reducing culture to a single definition. Its First Nations-led work identified six broad domains: Country; beliefs and knowledge; language; family, kinship and community; cultural expression and continuity; and self-determination and leadership.³³

Mayi Kuwayu was not created as a Closing the Gap cultural-outcomes framework, but it demonstrates that substantial First Nations-led knowledge, methods and data-governance arrangements already exist.

The missing element is a policy process capable of bringing this work into decisions about culture, investment and government accountability.

If government accepts that public policy needs to measure what matters, and that culture is foundational to First Nations wellbeing, why has Closing the Gap not established a coherent, First Nations-led way of understanding cultural strength beyond language?

³² Australian Institute of Aboriginal and Torres Strait Islander Studies, "Report on the Situation and Status of Indigenous Cultures and Heritage", webpage last updated 28 October 2025; Australian Government, *Measuring What Matters: Australia's First Wellbeing Framework* (July 2023), p. 17.

³³ Bourke, S. et al., "Developing Aboriginal and Torres Strait Islander cultural indicators: an overview from Mayi Kuwayu, the National Study of Aboriginal and Torres Strait Islander Wellbeing", *International Journal for Equity in Health*, vol. 21, article 109 (2022).

I put the contradiction this way in my 2025 submission to the Productivity Commission:

*“How can First Nations Culture be truly valued if it is not measured; if there is no First Nations Cultural Policy; if there is no analysis of expenditures and if it is minimally funded?”*³⁴

This is not an argument for placing First Nations cultures inside a government-designed national dashboard. A First Nations-led process would determine what cultural strength means in different contexts, what can appropriately be understood nationally, what requires local interpretation and how evidence can contribute to Australia’s wider understanding of wellbeing and progress.

It would also separate cultural evidence from government accountability. Cultural evidence concerns the strength and continuity of living cultures. Government accountability concerns the decisions within government control: whether cultural organisations and infrastructure are supported, barriers are removed, commitments are implemented and evidence changes policy and investment.

As Jon Altman has observed, more reporting does not necessarily produce more accountability. Information can describe what is happening, but a policy framework is needed to connect that information to decisions, responsibilities and action.³⁵

Together, the four Priority Reforms show that the cultural policy gap is not separate from Closing the Gap. It limits the Agreement’s capacity to establish genuine partnerships, strengthen community-controlled organisations, transform government and connect information with action.

6. A practical way forward

The Productivity Commission does not need to design a First Nations Cultural Policy, decide who represents First Nations cultures or prescribe a new national institution. It can recognise that Closing the Gap’s cultural commitment lacks a complete policy and institutional pathway and recommend that the parties resource First Nations people and organisations to develop one.

³⁴ Wes Morris, *Cultural Resilience is Key to First Nations Wellbeing: Productivity & Prevention Through Culture*, individual response to the Productivity Commission’s *Delivering Quality Care More Efficiently Interim Report* (15 September 2025), pp. 7–8.

³⁵ Jon Altman, *A Submission to the Productivity Commission on the Review of the National Agreement on Closing the Gap Draft Report*, Submission 51, Productivity Commission, 6 October 2023, p. 12.

A properly resourced First Nations-led process to develop a Cultural Policy or Plan provides a practical place to begin. The purpose would not be to arrive at one national definition of culture. It would be to consider how the National Agreement's commitment to culture can be pursued across different cultural contexts and across the areas of government that affect cultural strength and continuity.

The process would need to draw upon the experience of cultural leaders, cultural organisations, community-controlled organisations and other relevant First Nations institutions. These participants would not all perform the same role or speak for the same people, places or cultural responsibilities. The task would be to create a process in which those differences can inform policy rather than being resolved through a definition imposed by government.

The process could also consider the institutional relationships required to carry the policy forward. One question concerns the absence of an adequately resourced national First Nations peak body for the community-controlled arts and cultural sector. A related but broader question is whether an organisation or representative mechanism is required to maintain an ongoing relationship with government across the full breadth of First Nations culture. These questions are connected but not interchangeable. Their answers, including questions of purpose, governance, constituency and relationships with existing organisations, remain matters for First Nations-led deliberation.

Government has work of its own to undertake alongside this process. It can map where responsibility, programs, expenditure and accountability for culture currently sit; identify what falls between portfolios and jurisdictions; and examine whether its systems are capable of responding coherently to the policy developed through First Nations-led deliberation. This is how government contributes to the process: not by defining or governing First Nations culture, but by reforming the systems through which it makes decisions and allocates resources.

The immediate task is to resource the people and organisations required to undertake this work while governments examine whether their own systems are capable of responding. That would move Closing the Gap from recognising culture to acting on that recognition.

7. Purrumpa 2027 asks what happens next

Creative Australia has announced that Purrumpa National Gathering II will be held in Perth in 2027. The gathering brings the central question raised by this submission into sharp focus: First Nations arts and cultural leaders will come together while Australia still has no overarching First Nations Cultural Policy or enduring national relationship through which cultural priorities can influence government.³⁶

Purrumpa 2027 continues a national conversation about cultural leadership, institutions and representation that stretches back more than five decades. The 2022 gathering included discussion of a national collective voice through a National Indigenous Arts and Cultural Authority.³⁷ Government should therefore engage with the cultural leaders, organisations and peak bodies contributing to these discussions, build on the proposals they have already developed, and support their preparation and continuing deliberation beyond the gathering. The agenda, proposals and any representative mandate arising from Purrumpa remain for First Nations participants to determine. Its significance for this submission is that an existing conversation and identifiable cultural leadership provide a practical starting point for engagement.

The gathering brings several unresolved questions into view:

- What would a First Nations Cultural Policy need to address?
- Is a national cultural organisation or representative mechanism required, and what purpose would it serve?
- How would any national arrangement relate to Nations, communities, regional organisations and existing specialist bodies?
- What investment and government reform are needed to sustain cultural organisations, cultural work and intergenerational transmission?

Government's responsibility is not to answer these questions on behalf of First Nations peoples or to assume that Purrumpa is the process through which they will be settled. It is to resource First Nations-led deliberation and develop the capacity to respond to its outcomes. The challenge presented by Purrumpa is what happens after cultural leaders leave the room: whether their knowledge and proposals have an enduring pathway into policy, investment and government accountability.

³⁶ Creative Australia 2026b, 'Major projects: Purrumpa National Gathering II, Perth 2027'.

³⁷ Creative Australia 2026b, 'Major projects: Purrumpa National Gathering II, Perth 2027'.

8. The Commission can recommend a pathway without predetermining the outcome

In its 2024 Review, the Productivity Commission called for governments to share power, support Indigenous Data Sovereignty, transform their own organisations and strengthen accountability. The cultural policy gap identified in this submission sits within that existing reform agenda.³⁸

Outcome 16 makes the gap particularly visible, but the problem is wider than one outcome. The National Agreement recognises culture as foundational across Closing the Gap without providing a coherent policy and institutional pathway through which that commitment can be put into practice. The Commission can identify that structural gap and recommend a properly resourced First Nations-led process to develop the response.

The Social Justice Report tells us what kind of relationship is needed: genuine partnership and shared power. Developing a Cultural Policy is a practical way to begin. It would give First Nations people the time and resources to decide what the policy needs to cover, how it would be governed, whether a national cultural organisation is needed and how cultural strength can be understood.

Government has different work to do. It can map and coordinate its existing responsibilities, programs and expenditure; identify barriers within its own systems; and provide the resources required for substantive First Nations participation. Government does not need to postpone all action until every institutional question is settled. Nor does it gain authority to settle those questions itself. It can reform its own systems, resource substantive deliberation and commit to responding to the outcomes.

The sequence is practical: recognise the gap; resource the people and organisations needed to examine it; map the government systems already operating; develop the policy and institutional response through First Nations-led deliberation; and report publicly on implementation. This moves Closing the Gap from recognising culture toward building the relationship required to act on that recognition.

³⁸ Productivity Commission, Review of the National Agreement on Closing the Gap, Study Report (2024).

9. Conclusion

The commitment already exists. The activity already exists. The people and organisations already exist. What is missing is the coherent policy process and institutional relationship that bring them together.

The 2025 Social Justice Report gives this gap greater urgency. Its call for “Genuine partnership and power-sharing which centres culture, community and Country and enables structural transformation” provides a direction for reform. A First Nations-led process to develop a Cultural Policy and consider the need for and form of a national cultural organisation would provide a practical starting point.³⁹

Outcome 16 makes the gap visible. Its language target has a formal policy partnership, defined priorities and an emerging evidence base. The wider promise that cultures are strong, supported and flourishing does not yet have an equivalent policy pathway dedicated to its full breadth. More indicators alone cannot supply the missing policy purpose, government coordination and institutional relationship.

The same is true of measurement. A government committed to Measuring What Matters cannot treat culture as foundational while leaving it largely outside the systems through which progress is understood and responsibility assigned. Completing this work requires more than adding indicators. It requires the First Nations-led policy process and enduring relationship through which the meaning, governance and use of cultural evidence can be determined.

Existing partnerships and co-design processes provide a foundation, but they cannot carry this work alone. Government can begin by coordinating and reforming its own systems and resourcing First Nations-led policy development. A Cultural Policy process can then consider the institutional relationship required to carry that work forward. Its form and outcomes remain matters for First Nations-led deliberation.

³⁹ Australian Human Rights Commission, *A Fair and Just Future for First Peoples: Social Justice Report 2025 (2026)*, p. 17.

About the author

<https://www.linkedin.com/in/wes-morris-3098059b/>

Wes Morris is an independent policy advocate and researcher with longstanding experience in First Nations cultural policy, cultural governance, community wellbeing and institutional reform.

Between 2006 and 2024, he served as Coordinator of the Kimberley Aboriginal Law and Culture Centre (KALACC), working alongside Kimberley Law Bosses, Elders, cultural custodians and communities on cultural maintenance, language, community development, governance and intergenerational knowledge transmission.

His work focuses on the relationship between culture, identity, governance and wellbeing, including cultural rights under the United Nations Declaration on the Rights of Indigenous Peoples. He has advocated for a stand-alone First Nations Cultural Policy, a national peak body for the First Nations arts and cultural sector, and stronger approaches to understanding and measuring cultural outcomes. This has included ongoing engagement with the Australian Centre for Evaluation within Commonwealth Treasury about the limitations of Measuring What Matters in reflecting First Nations cultural outcomes.

Through submissions to parliamentary inquiries and national policy consultations, and engagement with the United Nations Special Rapporteur on the rights of Indigenous Peoples, Wes has contributed to discussions on cultural rights, community-controlled cultural infrastructure, suicide prevention, cultural resilience and prevention-focused approaches to wellbeing.

This submission is made in an individual capacity. It draws on his experience, earlier cultural-policy work, and First Nations-led reports and submissions. It does not claim to speak on behalf of First Nations peoples, organisations or cultural authorities.

References

- Alfred, T 2019, *Indigenous Resurgence and State Responses in North America*, keynote address to the AIATSIS Culture and Policy Symposium, 6 March 2019.
- Altman, J. (2023), *A Submission to the Productivity Commission on the Review of the National Agreement on Closing the Gap Draft Report*, Submission 51, Productivity Commission, 6 October 2023, https://assets.pc.gov.au/_data/assets/pdf_file/0004/367798/sub051-closing-the-gap-review.pdf.
- Australian Government 2023a, *Measuring What Matters: Australia's First Wellbeing Framework*.
- Australian Government 2023b, *Revive: A Place for Every Story, a Story for Every Place*, National Cultural Policy.
- Australian Government 2026, *Commonwealth Closing the Gap 2025 Annual Report and 2026 Implementation Plan*.
- Australian Government and Coalition of Aboriginal and Torres Strait Islander Peak Organisations 2020, *National Agreement on Closing the Gap*, current version.
- Australian Government, Office for the Arts 2026a, 'Aboriginal and Torres Strait Islander Languages Policy Partnership'.
- Australian Government, Office for the Arts 2026b, 'Protecting First Nations Traditional Knowledge and Traditional Cultural Expressions'.
- Australian Human Rights Commission 2013, *Ensuring the Ongoing Survival of the Oldest Living Culture in the World*, Declaration Dialogue Series Paper No. 4.
- Australian Human Rights Commission 2026, *A Fair and Just Future for First Peoples: Social Justice Report 2025*.
- Australian Institute of Aboriginal and Torres Strait Islander Studies 2019, *AIATSIS Culture and Policy Workshop*, 7 March 2019.
- Australian Institute of Aboriginal and Torres Strait Islander Studies 2025, 'Report on the Situation and Status of Indigenous Cultures and Heritage', webpage last updated 28 October 2025.
- Banks, G 2012, 'Elders bring new hope to the Kimberley', *Reconciliation News*, Issue No. 25, December 2012, pp. 8–9.
- Bourke, S, Chapman, J, Jones, R, Brinckley, M-M, Thurber, KA, Calabria, B, Doery, K, Olsen, A and Lovett, R 2022, 'Developing Aboriginal and Torres Strait Islander cultural indicators: an overview from Mayi Kuwayu, the National Study of Aboriginal and Torres Strait Islander Wellbeing', *International Journal for Equity in Health*, vol. 21, article 109.
- Closing the Gap 2026, 'Table B: Outcome 16', *National Agreement on Closing the Gap*.

Creative Australia 2022, *Bringing It Forward: Report of Consultations Concerning a National Indigenous Arts and Cultural Authority*.

Creative Australia 2026a, 'First Nations Board', accessed 9 October 2026,

<https://www.creative.gov.au/first-nations-arts/first-nations-board>.

Creative Australia 2026b, 'Major projects: Purrumpa National Gathering II, Perth 2027', accessed 8 October 2026, <https://creative.gov.au/first-nations-arts/major-projects>.

First Languages Australia 2025, *Languages Policy Partnership Priorities Update*.

First Languages Australia 2026, 'Languages Policy Partnership'.

Indigenous Art Centre Alliance 2026, 'IACA Board', <https://iaca.com.au/iaca-board>.

Joint Council on Closing the Gap 2025, *Response to the Productivity Commission Review of the National Agreement on Closing the Gap*.

Lavarch, L, Coombes, L, Gray, K, Anthony, C and Nolan-Smith, S 2025, *Independent Aboriginal and Torres Strait Islander-led Review of Closing the Gap*.

Morris, W 2025, *Cultural Resilience is Key to First Nations Wellbeing: Productivity and Prevention Through Culture*, individual response to the Productivity Commission's *Delivering Quality Care More Efficiently Interim Report*, 15 September 2025.

Morris, W 2026a, *A Framework for Strengthening Government to Support First Nations Cultures*.

Morris, W 2026b, *From Recognition to Reform: First Nations Cultural Rights and Cultural Governance*, submission to the National Cultural Policy review.

Morris, W 2026c, *From Recognition to Reform: First Nations Cultural Rights and Cultural Governance: Further Evidence for the Next National Cultural Policy*, draft addendum.

National Aboriginal Health Strategy Working Party 1989, *A National Aboriginal Health Strategy*, Canberra.

National Close the Gap Alliance Group 2023, *Strong Culture, Strong Youth: Our Legacy, Our Future – Close the Gap Campaign Report 2023*, Karabena Publishing, Melbourne.

Oscar, J 2020, 'June Oscar's 2020s vision: Reaching our potential as a nation begins with truth-telling', *The Guardian*, 31 January, <https://www.theguardian.com/australia-news/2020/jan/31/june-oscars-2020s-vision-reaching-our-potential-as-a-nation-begins-with-truth-telling>.

People Culture Environment and Our Generation Media 2014, *The Elders' Report into Preventing Indigenous Self-harm and Youth Suicide*.

Productivity Commission 2024, *Review of the National Agreement on Closing the Gap*, Study Report.

Productivity Commission 2025, *Delivering Quality Care More Efficiently*, Inquiry Report, December 2025.

Productivity Commission 2026, *Review of the National Agreement on Closing the Gap 2026: Call for Submissions*.

United Nations 2007, *United Nations Declaration on the Rights of Indigenous Peoples*.