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Indigenous Allied Health Australia
Submission to the Productivity Commission's review of the National Agreement on Closing the Gap 2026

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Acknowledgement of Country

Indigenous Allied Health Australia acknowledges the Traditional Custodians across the lands, waters and seas that we work and live. We pay our respect to Elders, knowledge holders and older peoples who have paved the way for Aboriginal and Torres Strait Islander peoples across the nation. They have upheld sovereignty and continue passing on cultural knowledge to the next generations.

About Indigenous Allied Health Australia

Indigenous Allied Health Australia (IAHA) is a national, community-controlled and member-based Aboriginal and Torres Strait Islander allied health workforce organisation. IAHA leads in Aboriginal and Torres Strait Islander health workforce education, training and development, and support, to advance the health and wellbeing of Aboriginal and Torres Strait Islander peoples. IAHA is a founding Coalition of Peaks Organisations (CoP) member, a member of the National Indigenous Health Leadership Alliance, and advocates for policy transformation aligned to the National Agreement on Closing the Gap's priority reforms (PR).

IAHA's membership represents a collective of allied health disciplines working across sectors including, but not limited to, health, mental health, disability, aged care, education, justice, community services, academia and public policy. IAHA's almost 2,300 Aboriginal and Torres Strait Islander members contribute to the health and wellbeing of all Australians across the nation. IAHA recognises, values and respects the Aboriginal and Torres Strait Islander allied health sector's cultural and professional diversity.

IAHA informs and leads national and state policy agendas across health, education and training, social and emotional wellbeing, disability and aged care. IAHA policy agendas are aligned to the:

- *National Agreement on Closing the Gap*[1] (National Agreement)
- *National Aboriginal and Torres Strait Islander Health Plan 2021-2031*[2]
- *National Aboriginal and Torres Strait Islander Health Workforce Strategic Framework and Implementation Plan 2021-2031*[3].

IAHA recognises that realising the Aboriginal and Torres Strait Islander-led objectives built into these policy frameworks necessitates the PRs moving from Aboriginal and Torres Strait Islander-led design to accountable implementation.

[1] National Agreement on Closing the Gap, 2020. Closing the Gap Partnership.

[2] National Aboriginal and Torres Strait Islander Health Plan 2021–2031, 2021. Australian Government Department of Health, Disability and Ageing.

[3] National Aboriginal and Torres Strait Islander Health Workforce Strategic Framework and Implementation Plan 2021–2031, 2022. Australian Government Department of Health, Disability and Ageing.

Executive Summary

IAHA responds to the Productivity Commission's call for submissions to the National Agreement review. Our submission is structured in two parts: a recommendations summary, followed by detailed recommendations with accompanying context, evidence and rationale. Our recommendations:

- outline how systemic reforms (including self-determination, clearer accountability and sustained investment) can translate the National Agreement from commitment into accountable action across all government levels
- examine the current and potential role of Aboriginal and Torres Strait Islander people, communities and organisations in governance, shared decision-making, government transformation, sector strengthening and Indigenous data sovereignty.

The latest Closing the Gap Dashboard shows that of the 17 targets:

- three targets are improving and on track
- five targets are improving but not on track
- worryingly four targets are worsening and not on track
- four targets have no assessment available; and
- no data is available on progress of the PRs

These results provide compelling evidence that the National Agreement's commitments are not being translated into meaningful and measurable progress. IAHA asserts that, to realise the National Agreement's intent, stronger:

- governance is needed by co-designing a more impactful shared decision-making model for the Joint Council, Coalition of Peaks, CTG Partnership Working Group and Joint Working Group which supports stronger debate and contest of ideas and better translation to action. Governance mechanisms must better prioritise Aboriginal and Torres Strait Islander ways of knowing, being and doing so that decision-making is informed by all Aboriginal and Torres Strait Islander peoples, communities and organisations' perspectives, rather than a select few.
- accountability through an overarching culturally responsive legislative framework must ***mandate*** all governments to:
    - proactively implement all PRs, including by:
        - sharing decision-making with Aboriginal and Torres Strait Islander peoples through more integrated government approaches that reflect whole-person, family and community needs across the life course, rather than siloed departmental priorities
        - shifting focus beyond mere program transition to community-control towards sustained whole of government investment in culturally responsive systems
        - government transformation through mandated cultural safety and responsiveness in action training for all public servants.
        - upholding governance of Indigenous data[4]
    - achieve all National Agreement targets and outcomes

[4] Framework for Governance of Indigenous Data, 2024. National Indigenous Australians Agency.

- implement all *Review of the National Agreement on Closing the Gap*[5] and *Independent Aboriginal and Torres Strait Islander-led Review*[6] recommendations.

Recommendations summary

Table 1 outlines IAHA's recommendations.

Table 1. Recommendations summary

No.	Recommendation
Recommendation 1	Redesign National Agreement governance
Recommendation 2	Culturally responsive accountability framework
Recommendation 3	PR 1. Mandate shared decision-making
Recommendation 4	PR 2. Whole of government investment in culturally responsive systems
Recommendation 5	PR 3. Culturally responsive governments
Recommendation 6	PR 4. Governance of Indigenous data
Recommendation 7	Implement existing review recommendations in full

Recommendations in detail

Recommendation 1: Redesign National Agreement governance

Co-design a new National Agreement governance model that is less bureaucratic, more inclusive and better aligned to Aboriginal and Torres Strait Islander ways of knowing, being and doing. The current structure replicates existing and established government processes and constrains the debate and contest of ideas and scope of possible solutions. Engagement is instead largely driven instead by pre-established and held positions and resulting in limited translation to action.

The National Agreement on Closing the Gap framework should support meaningful collaboration, equitable participation and shared authority, including recognising the role of Aboriginal and Torres Strait Islander Nations and Nation governance alongside organisational and government, as described further below. Stronger transparency needs to ensure decision-making processes respond to Aboriginal and Torres Strait Islander peoples, communities and organisations' diverse needs and aspirations.

[5] Closing the Gap review, 2024. Australian Government Productivity Commission.

[6] Independent Aboriginal and Torres Strait Islander-led Review of Closing the Gap, 2025. Coalition of Peaks.

Recommendation 2: Culturally responsive accountability framework

Establish a culturally responsive legislative accountability framework that requires all governments to demonstrate how legislation, policies, programs and funding decisions align with the National Agreement on Closing the Gap, embed shared decision-making and whole-of-government responsibilities, mandate transparent reporting and independent oversight, and create consequences where governments fail to meet their commitments. Figure 1 outlines key foundational principles upon which a culturally responsive accountability framework should be co-designed between Aboriginal and Torres Strait Islander peoples and governments.

Implementing this framework should be grounded in Aboriginal and Torres Strait Islander cultural authority, ensuring that legislation, policies, programs and funding decisions are informed by Aboriginal and Torres Strait Islander ways of knowing, being and doing. It should embed genuine partnerships through shared decision-making across the full policy cycle, strengthen stewardship of public resources to advance self-determination and Closing the Gap outcomes, and promote transparency through accessible reporting on decisions, investments and impacts. The framework should foster reciprocity by establishing relationships based on mutual respect, trust and shared responsibility, while creating clear accountability for governments to deliver on their commitments. It should support continuous learning through monitoring, evaluation and knowledge sharing, drive renewal through regular review and improvement of systems and practices, reinforce whole-of-government responsibility across all portfolios and levels of government, and enable community oversight through independent Aboriginal and Torres Strait Islander-led mechanisms that monitor progress, scrutinise performance and hold governments accountable for achieving meaningful outcomes.

Recommendation 3: PR 1. Mandate shared decision-making

Embed genuine and shared decision-making by transferring meaningful decision-making authority to Aboriginal and Torres Strait Islander peoples, communities, organisations and Nation groups across the entire policy cycle, from agenda setting and policy design through to implementation, monitoring and evaluation. This should be supported by ongoing, cyclical co-design processes that commence at problem identification and continue throughout the life of policies and programs, independent of political and electoral cycles. To give effect to self-determination, governments should establish government-to-government style relationships with Nation groups and reorient the National Agreement as a mechanism for sharing power, enabling Aboriginal and Torres Strait Islander peoples to shape legislation, policy, funding and service delivery, rather than merely providing advice on decisions made by others.

Support equitable, long-term and adequately resourced partnerships with Aboriginal and Torres Strait Islander peoples, communities and organisations, ensuring influence, decision-making authority and investment are broadly shared rather than concentrated among a limited number of entities. This should be complemented by coordinated, cross-agency mechanisms that align government systems, funding and governance arrangements to address the interconnected social determinants of health and wellbeing through a whole-of-government approach, reducing silos, duplication and administrative burden while enabling more integrated, community-centred responses across the life course.



Figure 1. Culturally responsive accountability framework elements

Recommendation 4: PR 2. Whole of government investment in culturally responsive systems

Invest in culturally responsive systems through a coordinated whole-of-government approach that embeds cultural safety, responsiveness and accountability across all policies, programs and services, ensuring Aboriginal and Torres Strait Islander peoples can access culturally safe and responsive services regardless of where they seek support, not only within community-controlled organisations. This requires sustained investment across portfolios and throughout the life course, recognising that health and wellbeing outcomes are shaped by interconnected factors including education, housing, employment, justice, disability, aged care and workforce development. Governments should rightfully prioritise long-term investment in established Aboriginal and Torres Strait Islander organisations and peak bodies with demonstrated expertise and impact, strengthening capability, infrastructure, leadership and sustainability.

This can sit alongside investment in increasing local and placed based capacity, ensuring investment reaches community and Nation determined structures, and a sustainable role for other organisations currently responding well to the needs of our communities. Simply expending the number of Aboriginal and Torres Strait Islander organisations funded does not equate to success and can risk duplication or withdrawal of services. Funding models should move beyond short-term, compliance-driven arrangements towards culturally responsive, partnership-based approaches that are co-designed with Aboriginal and Torres Strait Islander organisations, focused on community-defined outcomes, and supported by enduring relationships that extend beyond individual programs, funding agreements and political cycles. Governments and funding agencies should be required to transparently demonstrate how investment decisions contribute to the Priority Reforms, strengthen community-controlled sectors, build long-term capability and support coordinated action across portfolios to address the social and cultural determinants of health and wellbeing.

While the First Nations Health Funding Transition Program[7] seeks to transition program funding to Aboriginal and Torres Strait Islander community control, progress appears slow, fragmented and often reliant on the cultural capability and commitment of individual public servants rather than being embedded within government approaches. Funding transition implementation is also inconsistent across jurisdictions and agencies, limiting reform scale and impact. There is also minimal evidence of funding transition lessons learned, models and enabling mechanisms being systematically shared across government portfolios. To achieve meaningful and lasting change, governments must adopt a more coordinated, whole-of-government approach that applies these learnings across sectors and agencies, accelerating the transition to community control and supporting broader structural reform that advances Aboriginal and Torres Strait Islander self-determination.

Recommendation 5: PR 3. Culturally responsive governments

Mandate cultural safety, anti-racism and National Agreement accountability as core responsibilities across all levels of government, including for senior public servants. This should include mandating ongoing cultural safety and responsiveness training for all public servants, linked to performance management and leadership accountability, and requiring agencies to actively identify, monitor and

[7] First Nations Health Funding Transition Program, 2023. Australian Government Department of Health, Disability and Ageing.

address institutional racism within their systems, policies and practices. Governments should streamline reporting, grants administration and engagement processes to reduce unnecessary bureaucracy and administrative burden, enabling culturally safe, trust-based partnerships with Aboriginal and Torres Strait Islander peoples, communities and organisations. Responsibility for implementing the National Agreement and Priority Reforms must extend beyond Aboriginal and Torres Strait Islander-specific portfolios, with all government agencies and senior executives required to demonstrate practical application within their areas of responsibility and be held accountable for delivering measurable improvements in policy, funding, service delivery and outcomes.

Recommendation 6: PR 4. Governance of Indigenous data

Strengthen the governance of Indigenous data by investing in Aboriginal and Torres Strait Islander-led data systems that enable peoples, communities and organisations to govern, own, collect, analyse and use data relating to them in accordance with the principles of Indigenous Data Sovereignty and Indigenous Data Governance. Governments should build on and resource initiatives such as the Data Policy Partnership[8], which was established under Priority Reform Four to strengthen Aboriginal and Torres Strait Islander leadership in data policy, governance and decision-making, and to support a joined-up approach to addressing data gaps and improving data capability across jurisdictions. Governments should also invest in interoperable data systems across sectors and jurisdictions to provide timely, accurate and meaningful local, regional and national data that supports planning, accountability and evidence-based decision-making. This should include addressing existing data gaps and measurement limitations that prevent effective monitoring of some Closing the Gap targets and Priority Reforms. Data indicators, measures of success and reporting frameworks must be co-designed with Aboriginal and Torres Strait Islander peoples, communities and organisations to ensure they reflect community priorities, strengths, aspirations and outcomes, including the social and cultural determinants of health and wellbeing, while enabling communities to exercise greater authority over how their data is collected, interpreted, shared and applied.

Recommendation 7: Implement existing review recommendations in full

Require governments to fully implement and publicly report on the status, impact and outcomes of all recommendations contained in the Review of the National Agreement on Closing the Gap[9] and Independent Aboriginal and Torres Strait Islander-led Review[10] recommendations.

Further information

Paul Gibson
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[8] Data Policy Partnership, 2025. Australian Bureau of Statistics.

[9] Closing the Gap review, 2024. Australian Government Productivity Commission.

[10] Independent Aboriginal and Torres Strait Islander-led Review of Closing the Gap, 2025. Coalition of Peaks.