Measuring Disadvantage

Community-governed measurement and accountability

Submission to the Productivity Commission
Review of the National Agreement on Closing the Gap 2026
Kieran Shirey | 23 October 2026

I bring Aboriginal lived experience and a career in data and systems thinking to this proposal. It remains subject to community authority, methodological scrutiny and testing.

The decision I am asking for

I ask the Commission to assess a practical way to connect community-defined outcomes, repeat measurement, institutional responsibilities and action under Closing the Gap. The immediate request is for a jointly governed methodological and feasibility assessment, followed only if justified by a limited, independently evaluated pilot. I am not seeking adoption of a national index or an automatic funding formula.

My manuscript, Measuring Disadvantage to Strengthen Closing the Gap, develops this as a conceptual proposal. It reports no fieldwork, validated instrument or measured intervention effects. Its central question is testable: would this connection help communities and responsible institutions make and follow through on better-informed decisions than existing arrangements already allow?

The proposal addresses the review's questions on accountability, Priority Reform Four, shared decisions, effective funding and data improvements. [1, 2]

1. The practical gap to test

Closing the Gap already includes local data and community decision-making commitments. The case for this proposal cannot rest on describing the Agreement as only national targets or claiming that disadvantage is not measured. The question is whether participating communities can use existing evidence to establish a priority, identify who can act, record the response and assess what changed.

A local profile would retain separate domain results, community capabilities and contextual evidence. For a few agreed priorities, a linked record would identify the condition, relevant decision rights and responsibilities, the response, intended beneficiaries, review period and subsequent findings. This would make the response to evidence visible without treating a community as a score.

National consistency should mean transparent definitions and comparable measurement where appropriate. It should not mean imposing identical priorities, thresholds or explanations on different communities. Where existing community plans, data partnerships or evaluation processes can meet this need with modest adaptation, that is preferable to creating another reporting system.

Recommendations in brief

- Assess the proposed method against existing statistical products and community-led practice, with published criteria and a reasoned conclusion.
- Identify an appropriate jointly governed assessment pathway, responsible coordinating body and next decision point, including how the Data Policy Partnership could contribute.
- Recommend a costed feasibility stage only where community authority, usable repeat evidence and a practical route from findings to decisions can be established.

2. What this adds to existing measures

SEIFA provides a valuable area-based view of relative socioeconomic conditions. ABS cautions that its scores are ordinal, do not quantify an amount of disadvantage and should not be read as individual circumstances. Its methodology also explains why comparisons over time are difficult, including changing variables, weights and geography. [3, 4]

IRSEO is an important Indigenous-specific comparator. Biddle and Markham's work uses Census evidence to examine relative socioeconomic outcomes for Aboriginal and Torres Strait Islander people across areas and periods. It should be part of the assessment, rather than overlooked or represented as incapable of examining change. [5]

Neither a new name nor a further set of indicators would establish added value. The proposed distinction is the governed connection between a locally meaningful condition, an actionable responsibility, a documented response and repeat review. Existing measures may supply context, help select settings or provide usable components. The assessment should determine what they already do and what, if anything, remains missing.

Repeat measurement would use defined populations or units, stable concepts, transparent reference points and documented breaks in series. A relative ranking and an absolute change in a specified condition answer different questions. Improved rank can coexist with unmet need; an unchanged rank can coexist with improvement. "Longitudinal" here means repeat observation of specified conditions, not necessarily tracking the same people. Any person-level panel or linkage would require separate methodological and governance approval.

3. Community-defined outcomes across domains

The framework should be able to work across the Agreement's outcome areas, but a pilot should begin with a manageable set chosen by participating communities. The following are examples for co-design, not predetermined indicators or claims about any community:

- Housing and essential services: suitability and functioning of homes, repair reliability and interruptions to water, power or other essential services, alongside residents' assessment of consequences.
- Health, early childhood and education: access to culturally safe care, child development supports and learning opportunities, with the relevant age groups, service populations and observation periods made explicit.
- Employment, economic participation and income security: sustained opportunities and barriers to access, rather than treating expenditure or a placement count alone as evidence of benefit.
- Justice, child and family safety, and social and emotional wellbeing: community-defined safety and support, interpreted with strict privacy protections and attention to whether administrative records capture actual need.
- Country, culture, languages and digital inclusion: priorities defined by the relevant people, including qualitative evidence where appropriate. Cultural knowledge must not be forced into a numerical index or disclosed without authority.

For each selected measure, participants would agree its purpose, unit, baseline, source, frequency, numerator and denominator where relevant, uncertainty and meaning of improvement. Separate domain results would remain visible so progress in one area cannot conceal deterioration in another. Strengths and aspirations would inform interpretation without being used to cancel out unmet needs or public responsibilities.

4. Authority, evidence and safeguards

Community authority must precede indicator selection. Participating communities should determine representation and share decisions about purpose, measures, access, interpretation, publication and subsequent use. Paid participation and analytical support belong in the core budget. Government-held data governance should be considered alongside the Framework for Governance of Indigenous Data, whose stated aim includes greater Aboriginal and Torres Strait Islander agency over that data. [6]

The responsibility record would distinguish statutory functions, contracts, funding conditions and voluntary commitments. It would show coordinating and contributing organisations, decision-making powers and dependencies. Unresolved or disputed responsibility would stay visible. The record would not itself establish legal liability, and persistent disadvantage would not alone prove institutional failure.

The pilot should keep three questions separate: did the specified condition change, did organisations meet evidenced commitments, and how far did an intervention contribute to the change? Spending and completed activities are not interchangeable with experienced outcomes. Before-and-after observations alone cannot establish causation. Evaluation should be designed from the outset, consistent with the Commission's Indigenous Evaluation Strategy. [7]

An illustration from my manuscript is deliberately hypothetical: defects in functioning washing facilities fall from 30 to 15 among the same 100 observed occupied dwellings. That describes a 15-percentage-point reduction for that group. It does not prove that broader housing disadvantage halved or that one intervention caused the change. Occupancy, inspection consistency, other repairs and concurrent actions would need examination.

Small populations, missing records, changing boundaries and population composition can make trends unreliable. Counts, rates, coverage and uncertainty should be reported together where useful. Aggregate domain profiles cannot establish that the same people experience overlapping disadvantage. That requires suitable unit-level evidence and authorised linkage. Where credible measurement is not possible, the result should remain inconclusive.

Data access must be lawful and culturally appropriate, with ethics review where required, protection against re-identification and clear publication and dispute arrangements. Public reporting of methods and organisational commitments should not require release of individual records or restricted cultural knowledge. No community participation, data access, agency endorsement or funding is assumed.

5. A bounded assessment and pilot pathway

- Feasibility: map existing measures and local arrangements; identify a decision they do not adequately support; establish community authority; test repeat-data quality; specify costs, access, a data dictionary and evaluation questions.
- Limited pilot: select settings for learning, not presumed national representativeness. Record a small number of priorities, responsibilities, responses and reviews. Document whether the evidence changes a decision and whether action follows.
- Independent evaluation: assess statistical credibility, actual community decision-making power, decision usefulness, costs, burden and unintended effects against existing practice. Evaluate the measurement process separately from individual interventions.
- Decision: adapt, extend or stop. Do not proceed without legitimate authority, useful data and a route to action. Do not expand without demonstrated additional value and community support; improving an existing process may be the better result.

6. The response sought from the Commission

I ask the Commission to address this proposal in its review analysis and identify whether the method warrants a feasibility assessment. A useful response would state the assessment criteria, where existing arrangements already meet the need, the remaining methodological questions and the appropriate next decision-maker. If the approach is unsuitable, explain why. If it warrants assessment, identify who is accountable for progressing it so it does not fall between agencies.

If the Commission cannot undertake the detailed assessment within this review, I ask it to identify a concrete pathway through the Agreement's existing governance, including consideration of the Data Policy Partnership, relevant statistical and evaluation expertise, and participating community-controlled organisations. The pathway should identify a coordinating body, a defined assessment product and an agreed timetable, rather than leave responsibility unresolved.

A process-accountability example

My experience seeking assessment illustrates the need for that distinction. NIAA's response MC26-004218 explained its use of complementary indicators and evaluation, but did not set out a proposal-specific methodological assessment or criteria. Its complaint process later treated that response as final. On 23 October, NIAA referred my further concerns internally and advised an expected response within 20 business days, subject to complexity. [8]

IBA's 14 October response to a related measurement enquiry made a budget-priority decision: it cited additional costs, resource requirements and capital constraints in declining expanded baseline and barrier measurement, and prioritised delivery. It then finalised the enquiry. [9] That explanation does not settle the accountability question. Should measuring who benefits, from what starting circumstances, and who is left behind be treated as core accountability rather than an optional extra? A proportionate assessment should establish what evidence is necessary and its cost, rather than assume either that more measurement is always justified or that delivery spending removes the need for it.

The Commission's 23 October reply provided useful comparators, Data Policy Partnership contacts and this review pathway. It also confirmed that the merits of a nationally consistent disadvantage measure had not been formally investigated. I do not treat that as a rejection following assessment. [10]

Public policy framing also matters. Kate Russell's Industry Insight, labelled sponsored content produced in commercial partnership with Supply Nation, argues against a disadvantage-first framing while acknowledging that challenges remain real and urgent. [11] Darren Godwell's July analysis advocates moving from managing disadvantage towards capitalising opportunity. [12] These arguments deserve engagement, but neither establishes that measuring disadvantage is unnecessary. Sponsorship is a disclosure fact, not evidence of improper motive; I do not allege either article was intended to obstruct scrutiny.

Opportunity, business growth and community capability matter. They should sit alongside evidence about who benefits, their starting circumstances and remaining unmet need. Recognising strengths does not remove the need to test whether disadvantage is reducing, or whether people facing the greatest barriers are being reached.

The review should also consider a transparent route for community-originated proposals. A response should distinguish policy explanation, methodological assessment, referral and complaint handling; identify the responsible body; state whether assessment occurred and against what criteria; and explain the next step or reasons for closure. This would make the system more accountable without requiring every proposal to be adopted.

References

1. Productivity Commission (2026). Closing the Gap Review 2026: Terms of reference, received 28 August 2026. Source

2. Productivity Commission (2026). Call for submissions, September 2026, especially pp. 8–14 and 16–18. Source

3. ABS (2023). Socio-Economic Indexes for Areas (SEIFA), Australia methodology, 2021: Understanding SEIFA and Time series. Source

4. ABS (2023). SEIFA Technical Paper, 2021: Using and interpreting SEIFA. Source

5. Biddle, N. and Markham, F. (2023). Area-level socioeconomic outcomes for Aboriginal and Torres Strait Islander Australians in the 2016 and 2021 Censuses. CAEPR Working Paper 144/2023. DOI: 10.25911/DY8M-S345. Source

6. Commonwealth of Australia (2024). Framework for Governance of Indigenous Data. Source

7. Productivity Commission (2020). Indigenous Evaluation Strategy and accompanying evaluation guide. Source

8. NIAA, response MC26-004218 and complaint correspondence of 14 and 23 October 2026.

9. IBA, response received 14 October 2026.

10. Productivity Commission, response dated 23 October 2026.

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11. Kate Russell, Industry Insight, sponsored content produced in commercial partnership with Supply Nation. Australian Financial Review, 25 May 2026.

https://www.afr.com/policy/economy/australia-s-quiet-economic-powerhouse-deserves-the-spotlight-20260512-p5zvxw

12. Darren Godwell, Analysis on Indigenous economic opportunity, National Indigenous Times, 8 July 2026. https://nit.com.au/08-07-2026/25250/explainer

Proposal source: Kieran Shirey, Measuring Disadvantage to Strengthen Closing the Gap, unpublished (submitted to JAIIS 16 September 2026) conceptual manuscript circulated 15 October 2026. This submission summarises the proposal; it does not report pilot findings.