SNAICC
National Voice for our Children

SNAICC Submission to the Productivity Commission 3-Year Review on Closing the Gap

2026

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Acknowledgment

SNAICC acknowledges the Traditional Custodians of Country throughout Australia and their continuing connections to land, waters and communities. SNAICC's head office is located on the lands of the Wurundjeri People of the Kulin Nation, and SNAICC operates nationally.

SNAICC acknowledges Traditional Owners of all lands and waters across this continent and pays respects to Elders past and present. We acknowledge and respect their continued connection to Country, care for community and practice of culture for generations uncounted.

About SNAICC

SNAICC – National Voice for our Children (SNAICC) is the national peak body for Aboriginal and Torres Strait Islander children. We work for the fulfilment of the rights of our children, to ensure their safety, development, and wellbeing. We are a community-controlled peak leading systemic and structural reform to protect and advance the rights, safety and wellbeing of Aboriginal and Torres Strait Islander children, young people, and their families and communities.

At the heart of SNAICC's work are the principles of community control and self-determination. We advocate for Aboriginal and Torres Strait Islander leadership in the design, governance and delivery of policies, systems and services that affect children and families, recognising this as essential to achieving sustained and meaningful outcomes.

SNAICC has a diverse national membership made up of Aboriginal and Torres Strait Islander community-controlled organisations, services and individuals working across the child and family wellbeing and early childhood sectors. This includes organisations delivering early childhood education and care, child and family services, family support and reunification services, out-of-home care and kinship care, and services supporting children and young people at risk. As a national peak body, SNAICC works closely with its members, Aboriginal and Torres Strait Islander leaders and communities, and as a member of the Coalition of Peaks, to ensure that lived experience, cultural knowledge and community priorities are central to our advocacy, submissions and recommendations.

SNAICC works with Aboriginal and Torres Strait Islander communities, governments and non-Indigenous services to improve policy, service design and accountability, and to support culturally-led, evidence-informed approaches that deliver meaningful and lasting outcomes for children and young people.

Executive Summary

SNAICC – National Voice for our Children (SNAICC) welcomes the opportunity to contribute to the Productivity Commission's Second Review of the National Agreement on Closing the Gap (National Agreement). This submission focuses on the implementation of the National Agreement, including governance and accountability arrangements and the four Priority Reforms. It identifies key areas of progress, ongoing barriers to implementation, and opportunities for governments to strengthen their commitments under the National Agreement.

The National Agreement represents a commitment to advancing self-determination by shifting decision-making authority, strengthening Aboriginal and Torres Strait Islander leadership and supporting communities to have greater control over the policies, services and systems that affect their lives. The Priority Reforms are the mechanism through which this vision is intended to be realised and remain critical to achieving sustained improvements in outcomes for Aboriginal and Torres Strait Islander children, families and communities.

SNAICC's policy, advocacy and program delivery experience demonstrates that meaningful progress is possible when governments genuinely invest in and implement the Priority Reforms as intended. Across Australia there are examples of governments, Aboriginal Community Controlled Organisations (ACCOs) and communities working together to implement the Priority Reforms and resulting improvements in the lives of children, families and communities.

However, implementation remains inconsistent and does not yet reflect the scale of change required under the National Agreement. Shared decision-making does not always translate into implementation, investment in the community-controlled sector remains insufficient, transformation across government systems is inconsistent, and barriers to data sharing, access and Indigenous Data Sovereignty persist. Progress under the Priority Reforms is also often less visible than progress against the socio-economic targets.

The National Agreement and the Priority Reforms provide a strong pathway to achieving self-determination and improving outcomes for Aboriginal and Torres Strait Islander children, families and communities. This submission highlights opportunities for governments to improve accountability and shared decision-making, support sector strengthening and transformation, address data gaps and support Indigenous Data Sovereignty and deliver on the commitments they have made under the National Agreement.

Recommendations

National Agreement Governance and Accountability

1. Establish clearer connections between National Agreement governance and accountability mechanisms and government decision-making processes, such as Cabinet processes and budget decisions, to ensure policy reform priorities agreed through shared decision-making forums are carried through to implementation, funding and delivery.
2. Establish mechanisms to monitor and report on government compliance with National Agreement commitments, including greater transparency around how recommendations move through government, where authority sits, how recommendations are being progressed, where proposals are not implemented, and clear explanations for those decisions.
3. Strengthen accountability frameworks to measure implementation of the Priority Reforms and to conduct analysis of target performance across jurisdictions, sectors and local contexts to provide a more complete picture of progress under the National Agreement.

Priority Reform 1: Formal Partnerships and Shared Decision-Making

4. Apply Priority Reform 1 consistently across all new policies, reforms and initiatives by engaging relevant Aboriginal and Torres Strait Islander representative organisations from the outset of policy development, and ensuring shared decision-making arrangements are included during Cabinet, budget and policy design processes.
5. Utilise existing National Agreement governance structures wherever possible and avoid establishing new governance or engagement mechanisms without first working in partnership with Aboriginal and Torres Strait Islander stakeholders to determine whether they are necessary and how they should operate.
6. Establish transparent shared decision-making arrangements underpinned with respect and trust by creating clarity around expectations, responsibilities, and scope, including where decision-making authority sits, which decisions are genuinely shared, and which decisions remain with government.
7. Resource Aboriginal and Torres Strait Islander representative organisations to participate in shared decision-making processes and invest in shared decision-making through government capability-building, leveraging practical tools and resources such as the Shared Decision-Making Guidance Toolkit.

Priority Reform 2: Building the Community-Controlled Sector

8. Establish and appropriately fund peak bodies for Aboriginal and Torres Strait Islander children in each jurisdiction.
9. Strengthen accountability mechanisms to ensure that all new government funding, commissioning, and investment decisions are consistent with commitments under the National Agreement.
10. Invest in ACCO sector transition and transformation across child and family services and ECEC in partnership with ACCOs, underpinned by accountability mechanisms, dedicated implementation plans, and public targets for investment commensurate with community need and proportionate to over-representation.
11. Implement a dedicated, reliable and consistent funding model funding models for ACCO delivering child and family services and ECEC services as outlined in the *Doing Things Differently* (SNAICC, 2026a) and *Funding Model Options* (SNAICC, 2024a) reports respectively, including a fixed block component and needs-based loadings.
12. Implement existing Sector Strengthening Plans and initiatives, ensuring that future plans are developed with built-in funding commitments, implementation pathways, monitoring frameworks and accountability mechanisms to support delivery of agreed actions and outcomes.

Priority Reform 3: Transforming Government Organisations

13. Develop, publish and implement, in partnership with Aboriginal and Torres Strait Islander people, whole-of-government strategies outlining how systems, structures, processes and approaches will be transformed in line with the National Agreement.
14. Increase and sustain investment in evidence-based initiatives that support cultural capability, cultural safety and organisational transformation, such as Waterways and A Place for Culture.
15. Strengthen leadership accountability, cultural capability and organisational ownership of National Agreement commitments across government agencies, portfolios, and performance measurement processes to ensure transformation is embedded at an organisational level.
16. Adopt strengths-based approaches to communication, reporting and engagement under the National Agreement that recognise the leadership of Aboriginal and Torres Strait Islander communities, build community engagement, and increase the visibility of structural reforms and their contributions to long-term outcomes.

Priority Reform 4: Shared Access to Data and Information at a Regional Level

17. Establish data-sharing arrangements with Aboriginal and Torres Strait Islander representative organisations and ACCOs as the default approach across governments, including through formal partnership agreements.
18. Increase investment in Aboriginal and Torres Strait Islander-led data infrastructure, research and data capability, including support for ACCOs and Peaks to collect, analyse, govern and use data in accordance with Indigenous Data Sovereignty principles.
19. Embed Indigenous Data Sovereignty principles across government data collection, governance, access, interpretation and reporting, including through Aboriginal and Torres Strait Islander leadership of decisions regarding what data is collected, how it is used and how success is measured.
20. Address critical data gaps under the National Agreement and ensure reporting frameworks accurately reflect Aboriginal and Torres Strait Islander experiences, including reviewing data definitions, inclusion criteria and reporting methodologies in partnership with Aboriginal and Torres Strait Islander organisations.

National Agreement Governance and Accountability

Overview

The National Agreement established governance and accountability arrangements to strengthen partnership and shared decision-making between governments and Aboriginal and Torres Strait Islander people. While mechanisms such as the Joint Council on Closing the Gap (Joint Council) and the Policy Partnerships established under the National Agreement [1] have created important opportunities for shared decision-making, challenges remain in ensuring decisions made through these forums translate into implementation across government. Strengthening the links between shared decision-making, accountability and implementation will be critical to achieving the full intent of the National Agreement.

What's working well?

The Early Childhood Care and Development Policy Partnership (ECCDPP), Safe and Supported and Joint Council are examples of strong governance arrangements delivering under the National Agreement. Together, these structures demonstrate the potential of the National Agreement architecture to embed strong governance grounded in shared decision-making and accountability between governments and Aboriginal and Torres Strait Islander people. They have contributed to positive outcomes including major funding reform, investment in ACCOs and establishment of critical accountability mechanisms. They have also provided greater visibility of policy, funding and implementation barriers, including those that may otherwise remain hidden within government systems, creating opportunities to strengthen accountability. Joint Council is a critical governance mechanism ensuring that Aboriginal and Torres Strait Islander people are equal partners in decision-making and oversight of the National Agreement. As the highest governance body established under the National Agreement, Joint Council brings together Coalition of Peaks representatives and senior government ministers. It provides a direct mechanism for Aboriginal and Torres Strait Islander representatives to raise priorities, influence national decision-making and hold governments accountable for their commitments. It also provides an important pathway for recommendations developed through Policy Partnerships to be considered by ministers, creating a direct link between community priorities and national decision-making.

The ECCDPP is one of the National Agreement's five Policy Partnerships. These Partnerships bring together governments and Aboriginal and Torres Strait Islander representatives through a shared decision-making structure under Priority Reform 1. Through the ECCDPP, members identify shared priorities relating to early childhood education and care (ECEC) and child safety and wellbeing. This forum ensures that

[1] Justice, Social and Emotional Wellbeing, Early Childhood Care and Development, Aboriginal and Torres Strait Islander Languages, Housing and Data.

community voices are embedded in national policy reform discussions and supports governments across jurisdictions to align on shared priorities.

An independent Evaluation of the ECCDPP found that it had established strong foundations for shared decision-making, underpinned by robust governance arrangements. The ECCDPP has created a trusted forum for governments and Aboriginal and Torres Strait Islander representatives to work through complex policy issues, test ideas, navigate challenges and develop recommendations collaboratively (Yamagigu Consulting, 2026). The ECCDPP's Co-chair and Co-secretariat arrangements between SNAICC and the Australian Government Department of Education were found to support shared leadership and responsibility, contributing to a strong sense of trust, reciprocity and shared ownership among members (Yamagigu Consulting, 2026). A key success has been the establishment of governance arrangements that enable the First Nations Caucus to engage effectively in shared decision-making processes (Yamagigu Consulting, 2026). This includes the structured support from SNAICC for the First Nations Caucus to meet separately, discuss issues, and develop shared positions to inform ECCDPP meetings. These findings demonstrate that, when adequately resourced and supported through shared governance arrangements, Policy Partnerships can create trusted relationships between government and Aboriginal and Torres Strait Islander representatives and provide an effective mechanism for progressing reform.

Strong shared decision-making governance arrangements also exist beyond the Policy Partnerships, including under the National Framework for Protecting Australia's Children 2021–2031 (Safe & Supported). Under the Safe and Supported Partnership Agreement, decisions around the implementation of Safe and Supported are to be made in genuine partnership between the Commonwealth, state and territory governments and the Aboriginal and Torres Strait Islander Leadership Group. This includes the Aboriginal and Torres Strait Islander Leadership Group participating in decision-making at a Ministerial level, via the Shared Decision-Making Committee.

Where has progress been limited?

While the governance arrangements established under the National Agreement have demonstrated the positive impact of shared decision-making, structural weaknesses and limitations within broader government systems mean implementation remains inadequate and transparency and accountability remain limited. Authority over funding and implementation decisions often remain in other government structures including First Ministers, central agencies and portfolio ministers and as a result, recommendations from the ECCDPP and Joint Council must also pass through layers of departmental and ministerial processes before implementation can occur. This can reduce transparency about how decisions are progressed and implemented and limit visibility of where agreed priorities have stalled, creating challenges for holding governments accountable for delivery.

The Evaluation of the ECCDPP highlighted that, while governments and Aboriginal and Torres Strait Islander representatives can jointly develop recommendations and influence policy thinking, the responsibility and authority for budget decisions, Cabinet approvals and implementation remains outside of the ECCDPP (Yamagigu Consulting, 2026). Shared decision-making therefore operates as a form of shared influence rather than shared authority, with agreed priorities requiring approval through broader government processes before they can be actioned. In this context, holding governments accountable for delivery and implementation can be a challenge, particularly when commitments are delayed or not followed through.

One example of this challenge is how governments have progressed the implementation advice for the ECCDPP's research report on Funding Model Options for ACCOs Delivering Integrated Early Years Services (SNAICC, 2024a). Despite the ECCDPP endorsing this research in 2024, it took almost 2 years for the Education Ministers Meeting (EMM) to note the implementation advice developed by the ECCDPP. This work was even further delayed by the decision to review the definition for ACCOs delivering integrated early years services in order to proceed with consideration of the report. The ECCDPP had limited visibility on the progress of these discussions, impacting implementation and accountability.

Similar challenges can be seen beyond the National Agreement's formal partnership structures at a jurisdictional level. The current architecture is limited in how it can hold state and territory governments accountable for their commitments under the National Agreement. For example, the 10-Year Roadmap to reduce the over-representation of Aboriginal children in out-of-home care in Western Australia has seen limited progress towards implementation despite clear need. The Roadmap was developed by SNAICC and the Western Australian government with significant input from Aboriginal communities, ACCOs and sector expertise. It provided clear recommendations for government action to address over-representation. Despite being delivered in 2023, it was never publicly released and there has been no formal government response to this inaction. There has also been limited transparency from governments about how or why their decisions to not progress have been made.

Additionally, accountability under the National Agreement remains heavily centred on progress made against the socio-economic targets. While the targets are a critical measure of outcomes, they do not capture the structural change outlined in the Priority Reforms that is required to drive long-term progress. Nor do they always reflect the complexity of, and variations in, implementation across jurisdictions, sectors and local contexts. This is compounded by the fact that there is no nationally consistent method to measure progress against the four Priority Reforms, which makes it difficult to measure structural change and hold governments accountable.

As a result, important progress achieved through reform and implementation can be less visible, contributing to a perception that the National Agreement is failing, particularly when progress against the targets remains limited. This can create an incomplete picture of progress under the National Agreement and of whether governments are delivering the reforms necessary to achieve long-term improvements in outcomes.

How can governments strengthen implementation?

Recommendation 1: Establish clearer connections between National Agreement governance and accountability mechanisms and government decision-making processes, such as Cabinet processes and budget decisions, to ensure policy reform priorities agreed through shared decision-making forums are carried through to implementation, funding and delivery.

Recommendation 2: Establish mechanisms to monitor and report on government compliance with National Agreement commitments, including greater transparency around how recommendations move through government, where authority sits, how recommendations are being progressed, where proposals are not implemented, and clear explanations for those decisions.

Recommendation 3: Strengthen accountability frameworks to measure implementation of the Priority Reforms and to conduct analysis of target performance across jurisdictions, sectors and local contexts to provide a more complete picture of progress under the National Agreement.

Priority Reform 1: Formal Partnerships and Shared Decision-Making

Overview

Priority Reform 1 commits all governments to working in genuine partnership and shared decision-making with Aboriginal and Torres Strait Islander communities. The National Agreement is underpinned by evidence that shows that when Aboriginal and Torres Strait Islander people have a genuine say in the design and delivery of services, policies and programs that affect them, better life outcomes are achieved. This approach requires Aboriginal and Torres Strait Islander people to be actively involved in shaping solutions from the start, not just consulted at the end. Shared decision-making is also closely connected to Priority Reform 3, which commits governments to transform their own organisations and ways of working to enable these partnerships.

SNAICC has developed guidance for Aboriginal and Torres Strait Islander organisations and governments on shared decision-making to help build capability in this area.

What's working well?

SNAICC's work across Connected Beginnings, Safe and Supported, and the ECCDPP provide insights into how formal partnerships and shared decision-making can be effective in practice and lead to real outcomes.

These outcomes are evident in recent reforms. The establishment of the National Commissioner for Aboriginal and Torres Strait Islander Children and Young People has created an independent mechanism to advocate for and uphold the rights of Aboriginal and Torres Strait Islander children. The removal of the ECEC Activity Test, and the increase in subsidised ECEC to 100 hours per fortnight for Aboriginal and Torres Strait Islander children, have together increased access for children and families.

These reforms demonstrate how shared decision-making can translate community priorities into national policy change. In each case, Aboriginal and Torres Strait Islander organisations and communities had been advocating for these reforms over many years. The establishment of shared decision-making structures under the National Agreement created the conditions for long-standing sector advocacy to be translated into tangible policy outcomes. Through forums such as the ECCDPP and Safe and Supported, these longstanding sector priorities were elevated onto national policy agendas, with governments and community representatives working together to navigate policy, legislative and jurisdictional barriers and develop a shared approach to reform.

The Connected Beginnings program is a clear example of genuine partnership delivering practical outcomes under the National Agreement. Connected Beginnings is an Australian Government national early years program intended to support the school readiness of

Aboriginal and Torres Strait Islander children aged 0-5 with 50 sites across Australia. The Productivity Commission has previously identified Connected Beginnings as an example demonstrating the value of investing in strong partnerships between government and the community-controlled sector, in conjunction with governance arrangements that build trust and enable shared decision-making.

The program has strengthened access to culturally safe early childhood, health and family support services for Aboriginal and Torres Strait Islander children and families. A mid-term evaluation found that Connected Beginnings was returning between $2.12 to $4.24 in positive outcomes and impacts for every $1 invested, demonstrating the value generated through community-controlled and place-based delivery (Inside Policy, 2023).

SNAICC is working in partnership with the Australian Government Department of Education to transition the program leadership of Connected Beginnings to ACCOs under the Aboriginal Leadership Transition Framework. When SNAICC commenced as Community Partner in 2022, only 2 ACCOs were contracted as backbone organisations, compared to 38 today. All 47 Health Partners are Aboriginal Community-Controlled Health Organisations.

Connected Beginnings demonstrates the value of embedding the Priority Reforms into program governance and implementation, showing how community-led approaches can improve service access, quality and responsiveness while supporting better outcomes for children and families. It is a strong blueprint for what effective place-based partnerships can and should look like under the National Agreement, and governments should invest in its expansion or replication.

Where has progress been limited?

Despite positive progress made through shared decision-making, the ongoing imbalance of power and decision-making authority continues to limit what shared decision-making can achieve. The Priority Reforms are interconnected and interdependent. In order for Priority Reform 1 to be successful, governments must also transform the ways they work with Aboriginal and Torres Strait Islander people and communities under Priority Reform 3. Governments must also strengthen ACCOs so that they have the resources and opportunity to engage in meaningful shared decision-making through Priority Reform 2, while ensuring access to the data that informs decision-making through Priority Reform 4.

Governments continue to demonstrate an inconsistent understanding of what shared decision-making requires in practice. While the National Agreement commits governments to working in formal partnership with Aboriginal and Torres Strait Islander people, Aboriginal and Torres Strait Islander organisations are frequently asked to provide advice on policy reform when it is well progressed and in some cases difficult to change rather than being involved from the outset in shaping priorities, designing processes and determining how reform should occur. This occurs at both a local level, with ACCOs and communities

having limited opportunity to inform what services are funded and delivered, and when setting policy directions at a state, territory and national level. This limits opportunities for shared decision-making and reduces the extent to which community priorities are reflected in final decisions.

Governments do not always make use of existing National Agreement governance structures and relationships when developing new policies and reforms. In many cases, new advisory groups, engagement processes or governance arrangements are established despite existing representative organisations, partnerships and forums already being well placed to provide community expertise, relationships and authority. This duplication can contribute to engagement fatigue, reduce the influence of established shared decision-making structures, and limit opportunities to build on existing trust and relationships. For example, there has been ongoing concern from the Aboriginal and Torres Strait Islander members of the ECCDPP about how the forum is engaged on key policy reform. Often critical decisions about related reform are made separately at Education Ministers Meetings and related fora despite the ECCDPP being the established national shared decision-making forum for Aboriginal and Torres Strait Islander early childhood education policy and reform, and SNAICC being the national peak body representing Aboriginal and Torres Strait Islander children and the early childhood education sector. Engagement for certain policy reform often occurs after key elements of the reforms had already been determined, falling short of shared decision-making under the National Agreement. As a result, these reforms risk missing the opportunity to fully draw on existing community expertise, sector leadership and established representative relationships in ways that could strengthen outcomes for Aboriginal and Torres Strait Islander children and families.

In many cases, there is also limited clarity about the scope and operation of shared decision-making arrangements. Aboriginal and Torres Strait Islander organisations are not always provided with clear information about where decision-making authority sits, which decisions are genuinely shared, how recommendations will be considered, or how disagreements will be resolved. This can create uncertainty about the purpose of engagement processes and make it difficult for all parties to understand their respective roles, responsibilities and accountabilities. Greater transparency around decision-making authority and expectations is critical to building trust and strengthening mutual accountability.

These challenges are compounded by inconsistent capability across governments to implement shared decision-making in practice. While commitment to Priority Reform 1 has grown, many government systems, processes and ways of working remain grounded in consultation-based approaches. As a result, the quality and consistency of shared decision-making can vary significantly across departments, portfolios and jurisdictions. Building the capability of government officials to work in genuine partnership with Aboriginal and Torres

Strait Islander people will be essential to ensuring shared decision-making becomes a standard way of working, rather than occurring only in specific forums or initiatives.

How can governments strengthen implementation?

Recommendation 4: Apply Priority Reform 1 consistently across all new policies, reforms and initiatives by engaging relevant Aboriginal and Torres Strait Islander representative organisations from the outset of policy development, and ensuring shared decision-making arrangements are included during Cabinet, budget and policy design processes.

Recommendation 5: Utilise existing National Agreement governance structures wherever possible and avoid establishing new governance or engagement mechanisms without first working in partnership with Aboriginal and Torres Strait Islander stakeholders to determine whether they are necessary and how they should operate.

Recommendation 6: Establish transparent shared decision-making arrangements underpinned with respect and trust by creating clarity around expectations, responsibilities, and scope, including where decision-making authority sits, which decisions are genuinely shared, and which decisions remain with government.

Recommendation 7: Resource Aboriginal and Torres Strait Islander representative organisations to participate in shared decision-making processes and invest in shared decision-making through government capability-building, leveraging practical tools and resources such as the Shared Decision-Making Guidance Toolkit.

Priority Reform 2: Building the Community-Controlled Sector

Overview

Priority Reform 2 commits governments to building formal Aboriginal and Torres Strait Islander community-controlled sectors to deliver services that support the National Agreement. It recognises that ACCOs are best placed to deliver services to Aboriginal and Torres Strait Islander communities, and achieve better results compared to mainstream services.

SNAICC delivers a breadth of supports to strengthen the ACCO sectors delivering ECEC, and child and family services. This work provides examples of best practice and learnings for government to consider in implementing Priority Reform 2.

What's working well?

There are positive examples of governments investing in and strengthening the sector in line with the intent of Priority Reform 2. While progress remains uneven, these initiatives demonstrate the benefits of investing in ACCO capacity, capability and leadership to deliver culturally safe, community-led services.

The National Child and Family Investment Strategy is a key example of how governments can invest in early, targeted and culturally safe supports for children and families. The strategy, developed under Safe and Supported, provides a nationally agreed framework to guide investment in the children and family sector and strengthening the ACCO sector. It focuses on shifting investment to prevention and early supports, and transitioning proportionate funding to ACCOs for services delivered to Aboriginal and Torres Strait Islander people. It will be underpinned by jurisdictional implementation plans, developed in partnership with local ACCOs, that identify priorities and monitor progress. Importantly, the strategy provides a mechanism for governments to work towards a more sustainable and proportionate investment approach, recognising the role of ACCOs in delivering culturally safe supports and improving outcomes for Aboriginal and Torres Strait Islander children and families in line with Priority Reform 2.

The Improving Multidisciplinary Responses Program is an example of investment at a national level. The program is funded by the Department of Social Services and delivered with SNAICC as the Community Partner across 15 ACCOs delivering child and family services located across Australia. The program invests in locally designed initiatives that strengthen family support systems by improving coordination for families navigating multiple and complex systems and building long-term organisational capability in ACCOs. This has enabled ACCOs to support earlier intervention and more coordinated responses for

families, helping to keep children safely connected to family, community and culture and reducing the risk of entering the child protection system and out-of-home care.

There are also positive examples of state and territory governments investing in strengthening the ACCO sector at a jurisdictional level. The SA Aboriginal Early Childhood Strategy commits to targeted investment in ACCOs through tailored funding models, sector strengthening initiatives and dedicated infrastructure funding to support ACCO early childhood services. In NSW, the state government's Family Preservation funding reforms introduce a 40 per cent ACCO investment target for family preservation services, equating to more than $69.5 million annually, to support new and existing ACCOs to deliver culturally safe early intervention and prevention services. Increased investment in ACCO-led child and family services is particularly strong in Victoria, including the expansion of the Aboriginal Children in Aboriginal Care program which transfers responsibility for the care and case management of Aboriginal children to ACCOs. This strengthens self-determination in child protection decision-making by supporting children to remain connected to family, community and culture, while recognising the capacity and authority of the ACCO sector. Investing in initiatives like these can contribute to improved outcomes under the National Agreement, as seen with Victoria recording the highest reunification rate for Aboriginal children nationally (SNAICC, 2025b; 2025c).

In our role as peak body, SNAICC supports sector strengthening through our ACCO sector transition and transformation work, which demonstrates what can be achieved under Priority Reform 2 when ACCOs lead the way. SNAICC works in partnership with ACCOs, mainstream non-government organisations, governments and philanthropic organisations to support the transition of service delivery for Aboriginal and Torres Strait Islander children and families from mainstream organisations to ACCOs. Ultimately, this work aims to transform the mainstream-dominated service systems into Aboriginal and Torres Strait Islander-led systems of care.

Examples of success in ACCO transformation can be found in SNAICC's partnerships with two mainstream organisations. Life Without Barriers has committed to transitioning out-of-home care services for Aboriginal and Torres Strait Islander children to ACCOs over 10 years, in partnership with SNAICC and other ACCOs under their National Transition Roadmap. SNAICC has also partnered with the Brotherhood of St Laurence to transition Aboriginal and Torres Strait Islander-focused sites of the Home Interaction Program for Parents and Youngsters to delivery by ACCOs or ACCO-led partnerships. To support broader sector reform, SNAICC is also leading the development of a National Transition Framework with ACCOs, peak bodies and partner organisations, to be launched in early 2027.

SNAICC also supports sector strengthening at a policy and practice level. In our policy capacity, SNAICC works with governments and ACCOs to identify sector priorities, advocate

for community-controlled solutions, and share decision-making in the development of reform initiatives under the National Agreement, including Sector Strengthening Plans. SNAICC also provides direct support to ACCOs to strengthen services. For example, the SNAICC Early Years Support program, funded by the Commonwealth Department of Education, works alongside ACCOs who deliver early learning and care services to deliver tailored support that responds to local priorities and strengthens services. This includes providing support for service design, governance, operational readiness, quality improvement and compliance with national standards, workforce development, and funding. This work helps ensure Aboriginal and Torres Strait Islander children and families can access high-quality, culturally safe early learning services that are designed and delivered by community, for community.

Government investment in the core operations and infrastructure of peak bodies supports progress under Priority Reform 2. This investment recognises the important role peak bodies play in creating the conditions for a strong and sustainable community-controlled sector. Through core funding provided by the Australian Government Department of Education, SNAICC has strengthened its role as the national peak body for Aboriginal and Torres Strait Islander children and families. Progress has also been made through investment in peak bodies at a jurisdictional level, such as through the establishment of Wakwakurna Kanyini in South Australia. As the Aboriginal community-controlled peak body for children and families in South Australia, Wakwakurna Kanyini strengthens the opportunities for the sector to engage in shared decision-making, represents the interests of ACCOs, supports sector development and works with governments to improve outcomes for Aboriginal children and families.

Where has progress been limited?

Structural change within governments is not occurring at the scale or pace required to support commitments under Priority Reform 2. The National Agreement recognised the importance of strengthening the ACCO sector, shifting decision-making and investing in ACCOs as key priorities for improving outcomes. However, governments continue to invest disproportionately in mainstream services rather than ACCOs, and there is limited progress in implementing of Sector Strengthening Plans and transition work.

ACCOs delivering child and family and ECEC services continue to face insecure and inflexible funding that impacts service delivery, organisational sustainability and growth. These challenges are outlined in *Doing Things Differently* (SNAICC, 2026a) and *Funding Model Options for ACCO Integrated Early Years Services* (SNAICC, 2024a) which recommend improved funding models for child and family and integrated early years services. This research found that disparate, short-term and siloed funding sources creates administrative burden, limits investment in workforce and organisational development, and constrains ACCOs' ability to provide the holistic, wraparound supports that are their key strength

(SNAICC 2024a & 2026a). The *Stronger Families, Stronger ACCOs* report also found that inflexible funding restricts ACCOs' scope for self-determination in choosing the types of services that they provide and how, limiting their responsiveness to community needs (SNAICC, 2023). This funding environment impacts on ACCO's ability to recruit, retain and develop their staff (SNAICC, 2024a & 2026a). Short-term contracts and insufficient funding make it difficult to offer competitive salaries, provide secure employment, and invest in long-term workforce development (SNAICC, 2024a & 2026a). ACCOs are often underfunded in a system that favours larger mainstream organisations with established infrastructure, economies of scale, and decades of investment (SNAICC, 2026a), and are more likely to be funded for crisis responses while non-government and non-Indigenous organisations receive funding for preventative programs (SNAICC, 2026a). The recommended funding model options in *Doing Things Differently* (SNAICC, 2026a) and *Funding Model Options for ACCO Integrated Early Years Services* (SNAICC, 2024a) provide a clear path forward to addressing these issues.

These challenges can also be seen in initiatives designed to strengthen ACCOs and grow the broader sector. While governments have invested in the development of Sector Strengthening Plans and initiatives across several jurisdictions and sectors, implementation remains uneven. In many cases, plans have not been supported by dedicated funding, clear implementation pathways or accountability mechanisms to monitor progress against agreed actions. As a result, significant effort invested by ACCOs, Peaks and governments in developing sector strengthening initiatives does not always translate into meaningful structural change. For example, while the Improving Multidisciplinary Responses Program is intended to support ACCO capacity-building and strengthen child and family service delivery, its short-term funding arrangements that do not enable sustainable investment to support lasting community outcomes. Similarly, while reforms such as the proportional allocation of family preservation funding to ACCOs in NSW represent a significant increase in investment, questions remain about whether current investment levels are sufficient to meet community need and support long-term sector growth.

There are also missed opportunities for government investment in ACCO sector transition and transformation. The recent redesign of the Department of Social Services' (DSS) Child and Family Support Program (CaFS Program) presented an opportunity to embed meaningful requirements for transition of funding to ACCOs to deliver services to Aboriginal and Torres Strait Islander children. However, transition under the CaFS Program remains primarily discretionary. DSS has recommissioned existing mainstream providers to deliver the new CaFS Program, a decision that risks maintaining current inequities, where ACCOs make up around 4 per cent of providers. Despite a funding carve out to support transition under CaFS, there is no commitment to a specific percentage of funding being transferred to ACCOs, nor timeframes for transition. More broadly, decisions about the design, commissioning and funding of services continue to be largely controlled by governments.

This can limit opportunities for Aboriginal and Torres Strait Islander communities to determine what services are needed, who should deliver them, and how funding should be allocated to best meet local needs.

Investment in peak bodies as enabling infrastructure remains inconsistent across jurisdictions. Peak bodies play a critical role as a collective voice of the sector and communities they represent, ensuring that the priorities, expertise and experiences of ACCOs inform policy on a state, territory and national level. However, funding for these functions is often short-term, project-based or insufficient to support long-term sector development. For example, the SNAICC Early Years Support program demonstrates the value of investing in peak bodies to strengthen the sector but remains limited to delivery in only three jurisdictions and operates under insecure funding arrangements. This creates uncertainty for both the sector and the organisations delivering this support. In some jurisdictions and sectors, there has also been limited progress in establishing Peaks or strengthening representative structures identified by ACCOs as necessary to support sector engagement and leadership.

How can governments strengthen implementation?

Recommendation 8: Establish and appropriately fund peak bodies for Aboriginal and Torres Strait Islander children in each jurisdiction.

Recommendation 9: Strengthen accountability mechanisms to ensure that all new government funding, commissioning, and investment decisions are consistent with commitments under the National Agreement.

Recommendation 10: Invest in ACCO sector transition and transformation across child and family services and ECEC in partnership with ACCOs, underpinned by accountability mechanisms, dedicated implementation plans, and public targets for investment commensurate with community need and proportionate to over-representation.

Recommendation 11: Implement a dedicated, reliable and consistent funding model funding models for ACCO delivering child and family services and ECEC services as outlined in the *Doing Things Differently* (SNAICC, 2026a) and *Funding Model Options* (SNAICC, 2024a) reports respectively, including a fixed block component and needs-based loadings.

Recommendation 12: Implement existing Sector Strengthening Plans and initiatives, ensuring that future plans are developed with built-in funding commitments, implementation pathways, monitoring frameworks and accountability mechanisms to support delivery of agreed actions and outcomes.

Priority Reform 3: Transforming Government Organisations

Overview

Priority Reform 3 recognises that Closing the Gap cannot be achieved without governments fundamentally transforming the way they work with Aboriginal and Torres Strait Islander people. SNAICC has seen encouraging examples of progress over the past three years, however, progress remains inconsistent and does not reflect the scale of transformation required to achieve outcomes under the National Agreement. To achieve the full intent of Priority Reform 3, governments must continue to embed cultural safety, address institutional racism, share power with Aboriginal and Torres Strait Islander people (Priority Reform 1), and strengthen accountability across their systems, policies and ways of working.

SNAICC has seen progress under Priority Reform 3 when governments have adapted processes, reduced bureaucratic barriers and demonstrated genuine commitment to partnership.

What's working well?

The Waterways Training Package is a strong example of governments investing in the development of training initiatives that directly contribute to Priority Reform 3. Waterways is a training program for government and non-government organisations to strengthen culturally responsive and trauma-informed practice in the child and family sector. It was developed by SNAICC in partnership with other ACCOs as part of a DSS-funded pilot project. Feedback from participants has been overwhelmingly positive and demonstrates the value of initiatives that move beyond cultural awareness to support genuine reflection on Aboriginal and Torres Strait Islander worldviews, the impacts of colonisation, power imbalances and unconscious bias. The program helps participants to build the capability required to create more culturally safe, respectful and responsive practice when working with Aboriginal and Torres Strait Islander children, families and communities.

Similarly, A Place for Culture demonstrates the value of investing in culturally safe practice within mainstream ECEC services. Developed by SNAICC, the initiative supports non-Aboriginal and Torres Strait Islander services to strengthen cultural understanding, reflect on existing practices and create environments where Aboriginal and Torres Strait Islander children and families feel respected, valued and connected. Through supporting services to embed Aboriginal and Torres Strait Islander perspectives and strengthen relationships with communities, the initiative helps create more culturally safe and responsive environments for Aboriginal and Torres Strait Islander children and families while strengthening capability across the mainstream early childhood sector.

Together, Project Waterways and A Place for Culture are helping to embed the principles of the National Agreement across mainstream systems and services. Strong participant feedback and continued demand for both programs suggest that governments' investment in these approaches is contributing to meaningful shifts in individual practice, organisational culture and service delivery.

Governments are also beginning to strengthen leadership accountability and organisational ownership of National Agreement commitments across agencies and portfolios. For example, the ACT Government has introduced legislation requiring senior public servants to promote cultural safety, work to eliminate institutional racism and demonstrate how they are contributing to implementation of the National Agreement (Australian Capital Territory, 2025). This represents a significant step towards transforming government organisations by embedding accountability within the formal responsibilities of public servants.

The ECCDPP Probity Framework is another example of progress towards the intent of Priority Reform 3. The Framework was developed to support shared decision-making within the ECCDPP and to clarify how probity, transparency and accountability can operate within partnership approaches. Importantly, it confirmed that shared decision-making with Aboriginal and Torres Strait Islander people is legitimate, lawful and consistent with public-sector probity requirements. Together with the broader work of the ECCDPP to strengthen shared decision-making processes, the Framework demonstrates governments' willingness to adapt existing systems and governance arrangements to better support power-sharing under the National Agreement.

The development of the Shared Decision-Making Framework and forthcoming Evidence Guidance Framework provide practical mechanisms to support transforming government systems. The Shared Decision-Making Framework provides practical guidance to embed shared decision-making in government decision-making, while the Evidence Guidance Framework will support governments to shift evidence practices so that Aboriginal and Torres Strait Islander knowledges are recognised, valued and utilised in policy and program development. Together, these frameworks address longstanding gaps in government processes by providing practical guidance and tools ensuring consistent practice from the outset and moving away from business as usual. The ECCDPP Evaluation also found that progress was supported by public servants who actively championed partnership approaches, invested in relationships and worked to navigate institutional barriers within government systems. This highlights that achieving Priority Reform 3 requires not only changes to formal structures and processes, but also leadership and commitment from individuals across government to embed new ways of working.

Where has progress been limited?

Despite the success of initiatives such as Project Waterways and A Place for Culture, access remains uneven. Investment has largely focused on the mainstream non-government

services, with less investment in transforming government organisations. While awareness of cultural safety and self-determination has grown in government, progress in shifting underlying narratives has been inconsistent.

As highlighted in SNAICC's submission to the Parliamentary Inquiry into Racism, Hate and Violence, institutional racism remains embedded across many government systems, from political discourse through to policy development and service delivery. Because institutional racism is embedded within systems, structures and decision-making processes, rather than resulting solely from the views or prejudices of individual public servants, it can persist even where individual capability and cultural awareness improve. While individual leaders can play an important role in championing new ways of working and driving reform, meaningful transformation requires governments to redesign the systems, policies and institutional practices that shape decision-making and service delivery.

This is evident across a range of government systems. For example, the Yoorrook Justice Commission (2025) found that the design and decision-making practices embedded within Victoria's child protection system contributed to the compounding over-representation of Aboriginal and Torres Strait Islander children at every stage of the system. Similarly, ACCOs delivering ECEC and child and family services continue to face structural barriers within government funding and procurement systems. ACCOs often compete with large non-government organisations that have benefited from decades of investment in infrastructure, workforce development and organisational growth. Government funding and commissioning processes can privilege Western forms of evidence and measures of success, while failing to adequately recognise community control, cultural authority and culturally grounded approaches to service delivery. These structural settings continue to disadvantage ACCOs regardless of the commitment or capability of individual decision-makers.

Institutional racism also continues to manifest through deficit-based narratives about Aboriginal and Torres Strait Islander children, families and communities. Too often, poor outcomes are discussed in isolation from the historical and ongoing impacts of colonisation, including dispossession, discriminatory government policies and the exclusion of Aboriginal and Torres Strait Islander people from decisions that affect their lives. As a result, discussions frequently focus on disadvantage and failure without adequate recognition of the structural drivers of inequality or the strengths, leadership and evidence-based solutions that exist within communities.

These narratives have tangible impacts on policy and investment decisions. They are evident when governments respond to worsening outcomes, such as increasing youth justice involvement and child protection system contact, through increasingly punitive approaches despite evidence that community-led and early intervention responses are more effective in improving long-term outcomes. They can also be seen where governments continue to invest in mainstream service responses rather than transferring authority, funding and service

delivery to Aboriginal and Torres Strait Islander community-controlled organisations, or step away from shared decision-making arrangements when these do not align with broader political priorities.

These challenges are compounded by limited strategic communication about the National Agreement and the Priority Reforms. Governments have an important role in building understanding of the historical and structural factors that contribute to inequality, and in communicating why transformational reforms are necessary to achieve long-term change. Too often, public discussion of Closing the Gap focuses on worsening target outcomes in isolation from the Priority Reforms, meaning that the broader context of colonisation, institutional racism and government reform receives less attention. This can reinforce deficit-based narratives about Aboriginal and Torres Strait Islander people and communities. By contrast, the Priority Reforms highlight the systemic and structural changes governments have committed to implementing to improve outcomes. Separating the targets and Priority Reforms can weaken accountability for government action and reduce understanding of how the National Agreement is intended to drive change. Greater use of strength-based approaches to communication, underpinned by greater visibility of the Priority Reforms, would support accountability for government action and improve understanding of how long-term change is expected to occur.

How can governments strengthen implementation?

Recommendation 13: Develop, publish and implement, in partnership with Aboriginal and Torres Strait Islander people, whole-of-government strategies outlining how systems, structures, processes and approaches will be transformed in line with the National Agreement.

Recommendation 14: Increase and sustain investment in evidence-based initiatives that support cultural capability, cultural safety and organisational transformation, such as Waterways and A Place for Culture.

Recommendation 15: Strengthen leadership accountability, cultural capability and organisational ownership of National Agreement commitments across government agencies, portfolios, and performance measurement processes to ensure transformation is embedded at an organisational level.

Recommendation 16: Adopt strengths-based approaches to communication, reporting and engagement under the National Agreement that recognise the leadership of Aboriginal and Torres Strait Islander communities, build community engagement, and increase the visibility of structural reforms and their contributions to long-term outcomes.

Priority Reform 4: Shared Access to Data and Information at a Regional Level

Overview

Priority Reform 4 commits governments to share data and information with Aboriginal and Torres Strait Islander communities and organisations at a regional level and in ways that reflect community priorities. It recognises that data about Aboriginal and Torres Strait Islander people must be shaped and governed by Aboriginal and Torres Strait Islander people themselves, reflecting their right to define success, measure impact, and share the stories of their children, families and communities.

What's working well?

The ACCO sector is leading data and evidence practice. Under our Strategic Plan 2025-2028, SNAICC (2024b) has committed to providing leadership across knowledge, evidence and data to support transformative action founded in Aboriginal and Torres Strait Islander excellence, culture and data sovereignty.

One avenue through which SNAICC and the ACCO child and family sector provide this leadership is the Family Matters annual report. Family Matters is Australia's only annual report written from an Aboriginal and Torres Strait Islander perspective that monitors governments' removal of Aboriginal and Torres Islander children from their families. It examines government action to address the over-representation of Aboriginal and Torres Strait Islander children in child protection. The report aims to increase transparency around the child protection system, with data drawn from public sources, requests that SNAICC issues to state and territory governments, and input from Aboriginal and Torres Strait Islander organisations, representatives and Commissioners. This includes data on state and territory government funding to ACCOs, which is not published in any national collection. Family Matters has also improved national reporting through other institutions, with the Australian Institute of Health and Welfare now capturing transparent data on children on third-party parental responsibility orders as a result of consistent advocacy within Family Matters.

SNAICC is also building the SNAICC Data Lake to enable data-informed policy development, service design, sector building and advocacy. The Data Lake is a large data storage and analysis platform that draws from a breadth of existing data sets to support the accessibility, visibility and sovereignty of data related to Aboriginal and Torres Strait Islander child and family wellbeing. It can currently be used by SNAICC staff to analyse data and create interactive dashboards to access and use insights, with future phases planned to build access, use and ownership for the broader ACCO sector. The Data Lake is about owning, using, and demystifying data to ensure that SNAICC, our sector and communities can make evidence-based decisions and build a stronger understanding of what children and families are experiencing.

SNAICC has commissioned and led various research projects that have elevated community knowledge to inform policy reforms and support Priority Reform 4. This work supports Aboriginal and Torres Strait Islander evidence to inform government decision-making and holds governments accountable to community-led priorities and measures of success. For example, the Believe Inquire Respond to Disclosures (BIRD) project brought together Aboriginal and Torres Strait Islander researchers, experts and victim-survivors to inform the development of a national training package and practise framework for responding to disclosures of child sexual abuse. Project BIRD aims to ensure that the knowledge and solutions held within communities are recognised, valued and reflected in decision-making. The project was recently named as a finalist in the 2026 Australian Human Rights Awards.

The ECCDPP has also commissioned the Queensland Aboriginal and Torres Strait Islander Child Protection Peak (QATSICPP), in partnership with the Jumbunna Institute and Onemda, to develop an Evidence Guidance Framework to respond to longstanding limitations in how evidence is defined and used within the child and family sector. It positions Aboriginal and Torres Strait Islander communities and organisations as the authority on how evidence about their children and families should be understood, generated and applied, while supporting stronger accountability to community-defined priorities, Indigenous Data Sovereignty and community-controlled decision-making. The Framework provides a practical roadmap for governments, funders, researchers and service providers to embed Aboriginal and Torres Strait Islander-led evidence approaches across policy, funding and monitoring and evaluation. The Framework is currently under final review and due to be released publicly in late 2026.

SNAICC is leading another ECCDPP-commissioned project focused on strengthening the evidence base in relation to pre-birth notifications and infant removals. The project seeks to identify barriers to accessing nationally consistent data and improve understanding of data gaps relating to Aboriginal and Torres Strait Islander families' interactions with child protection systems. Guided by the priorities and expertise of Aboriginal and Torres Strait Islander leaders, this work takes a different approach to evidence generation by focusing on the information communities have identified as critical to driving reform. In doing so, it advances Priority Reform 4 by challenging business-as-usual approaches to data and evidence, strengthening accountability, and ensuring that monitoring and reporting respond to community priorities and concerns.

Formal partnerships play an important role in promoting shared access to data. SNAICC's partnership agreement with the Department of Education has a Data Sharing clause which states the responsibility of the Department to share data that it owns with SNAICC to support shared decision-making. These types of clauses reduce the administrative burden for Peaks, inform better policy development and promote trusting relationships between government and Peaks.

Where has progress been limited?

Government data has long been collected about Aboriginal and Torres Strait Islander children rather than with them and has been used to describe deficit rather than to support decisions by communities. Both the Productivity Commission and Independent Aboriginal and Torres Strait Islander-led Reviews of the National Agreement found that Priority Reform 4 is not yet being met.

Under-investment in Aboriginal and Torres Strait Islander-led research and the National Agreement data development plans remains a major constraint on the ACCO sector's ability to inform policy and hold governments accountable for implementing their commitments to the National Agreement.

Progress towards Priority Reform 4 also continues to be limited by governments not sharing access to data, reflecting a lack of government transformation despite their commitments under the National Agreement. For example, while SNAICC's *Family Matters Report* is a key mechanism for tracking progress towards Target 12, SNAICC cannot compel government departments to share data, and the data SNAICC does receive varies significantly in quality by jurisdiction.

A lack of shared decision-making means that governments often continue to decide what data is collected and reported, often in ways that do not reflect community priorities. For example, SNAICC's *Family Matters Report* has consistently called for governments to expand the definition and counting rules for out-of-home care to include children who have been permanently removed from their families. At present, these children are excluded from public reporting on Target 12, obscuring the complete picture of Aboriginal and Torres Strait Islander children in out-of-home care, undermining government accountability and transparency and masking progress.

Data gaps persist across multiple National Agreement measures, impacting our ability to accurately assess progress. The Closing the Gap Annual Data Compilation Report from July 2026 identified that there is no nationally consistent way of measuring the Priority Reforms, that progress cannot be assessed for 4 targets due to a lack of time series data, and that there is no available data for 86 supporting indicators. This is an improvement on previous years but remains a significant gap.

Data collection and quality remain inconsistent across jurisdictions. Aboriginal and Torres Strait Islander communities have been clear that gaps in data, compounded by a lack of reliable access to existing data, makes it difficult to track and monitor progress. SNAICC's 2025 Family Matters Report demonstrates how these data gaps across jurisdictions continue to be a key barrier. For example, the Report found that data collected and reported in relation to the number of children accessing intensive family support services is limited, with some jurisdictions not providing any data for the Report. Addressing these gaps in data

was a key recommendation to enable Aboriginal and Torres Strait Islander communities to access, use and interpret data for local decision-making.

Accessing transparent reporting on government investment in the ACCO sector can also be a challenge. While governments may report substantial expenditure against Aboriginal and Torres Strait Islander programs or outcomes, without transparent reporting on who receives and controls that funding, it is difficult to assess how much is reaching ACCOs.

There are also structural barriers to improving data governance and Indigenous Data Sovereignty, including the absence of a central Aboriginal and Torres Strait Islander-led data body. In 2024, the Productivity Commission's annual review of the National Agreement advocated for the establishment of a dedicated Indigenous Data Bureau to strengthen coordination and support implementation of Indigenous Data Sovereignty. The Australian Government has also committed to delivering a National Aboriginal and Torres Strait Islander Centre for Excellence in Child and Family Support. Under Action 3 of the Safe and Supported Aboriginal and Torres Strait Islander First Action Plan, SNAICC has worked as part of an Expert Advisory Panel to design the Centre for Excellence to increase research grounded in Aboriginal and Torres Strait Islander knowledge and provide opportunities for Aboriginal and Torres Strait Islander-led research. Once delivered, this will improve the Aboriginal and Torres Strait Islander evidence base to ensure culturally safe services and systems in child protection and family support services. While this commitment and the significant co-design which has followed are positive developments, continued delays to the establishment of the Centre highlight the ongoing implementation gaps between agreed reforms and tangible outcomes.

How can governments strengthen implementation?

Recommendation 17: Establish data-sharing arrangements with Aboriginal and Torres Strait Islander representative organisations and ACCOs as the default approach across governments, including through formal partnership agreements.

Recommendation 18: Increase investment in Aboriginal and Torres Strait Islander-led data infrastructure, research and data capability, including support for ACCOs and Peaks to collect, analyse, govern and use data in accordance with Indigenous Data Sovereignty principles.

Recommendation 19: Embed Indigenous Data Sovereignty principles across government data collection, governance, access, interpretation and reporting, including through Aboriginal and Torres Strait Islander leadership of decisions regarding what data is collected, how it is used and how success is measured.

Recommendation 20: Address critical data gaps under the National Agreement and ensure reporting frameworks accurately reflect Aboriginal and Torres Strait Islander experiences, including reviewing data definitions, inclusion criteria and reporting methodologies in partnership with Aboriginal and Torres Strait Islander organisations.

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T3 Building, Suite A, Level 8, 36 Wellington Street, Yálla-birr-ang/Collingwood VIC 3066

PO Box 1144, Yálla-birr-ang/Collingwood VIC 3066 | 1300 762 422 | www.snaicc.org.au