Indigenous Consumer
Assistance Network Ltd.

26 October 2026

Productivity Commission
Review of the National Agreement to Close the Gap

Via email: ctg.review.2026@pc.gov.au

SUBMISSION TO THE REVIEW OF THE NATIONAL AGREEMENT ON CLOSING THE GAP - INDIGENOUS CONSUMER ASSISTANCE NETWORK (ICAN)

The Indigenous Consumer Assistance Network (ICAN) welcomes the opportunity to input into the Review of the National Agreement on Closing the Gap 2026.

ABOUT THE INDIGENOUS CONSUMER ASSISTANCE NETWORK (ICAN)

ICAN delivers financial wellbeing services (financial counselling and financial capability) to First Nations peoples and the broader community across north and far north Queensland, including in regional and remote communities as well as weekly outreach to Palm Island, Yarrabah and Lotus Glen Correctional Centre (LGCC).

Our vision is: Empowered consumers. Strong communities. Fair economies.

The people we work alongside are strong, resilient, and deeply knowledgeable about their lives and communities. However, structural barriers and uncompetitive markets in remote and regional areas create conditions in which financial exclusion and exploitation can occur.

Communities across north Queensland experience:

- Unacceptably high costs of living, with food and basic necessities significantly more expensive than in metropolitan and large regional centres
- Limited employment opportunities and economic volatility, including vulnerability to pandemics, industry downturns and extreme weather events
- Severe housing shortages, overcrowding and high rates of homelessness
- Poor and unreliable digital and telecommunications infrastructure, contributing to digital and financial exclusion
- Heavy reliance on private vehicles as the only viable form of transport, creating substantial upfront and ongoing financial pressures.

Within this context, inclusive, supported and accessible essential services are critical.

This submission focuses on a practical but significant structural barrier that is getting in the way of people accessing essential services, with a specific focus on people within the criminal justice system. That is, **lack of access to accepted photo identification.**

We note that:

- Throughout this submission we have provided quotes from our prison financial wellbeing team and from participants in our Prison ID Project Research. For privacy reasons, participants have not been identified.
- The 2026 report by ICAN and Dr Heron Loban, *Prison ID Project Research Report: Strengthening Reintegration through Access to Identification* is referred to throughout this paper as the Prison ID Project Research Report.
- ICAN's broader Prison ID project which includes both the research and the provision of funding for ID in Lotus Glen is referred to as the "Prison ID Project".
- The terms "Identification" and "ID" are variously used to describe forms of state issued photo identification that is recognised by both government and private entities as primary identification for the purposes of identifying an individual.

OUR KEY RECOMMENDATION IS SIMPLE:

All people leaving prison who require it should be supported through funding and assistance to obtain accepted primary photo identification and their birth certificate before release.

For First Nations people, this is both a Target 10 issue and a Priority Reform 3 issue. Reducing imprisonment requires governments not only to fund programs, but to identify and remove the structural barriers within mainstream systems that undermine successful reintegration. Ensuring people can obtain recognised identification before release is a practical example of the transformation contemplated by Priority Reform 3.

ICAN submits that access to identification provides a practical example of the relationship between the Priority Reforms and socio-economic outcomes. Identification is administered through mainstream government systems, but lack of access can prevent First Nations people from participating in banking, employment, housing, telecommunications and government services. Removing these barriers therefore requires more than an individual service response. It requires government to prioritise the removal of structural barriers to people obtaining their birth certificates and ID; work effectively with First Nations organisations and communities to support ongoing needs for ID by people in communities; and ensure that their policies and processes operate in trauma informed, culturally safe and equitable ways in practice.

We note that the challenges in accessing ID that are described in this submission stem from structural barriers to obtaining ID that First Nations people face in communities. The impact of not having ID for people in prison is similar for people who are not within the criminal justice system. Without identification that is recognised across government and essential service industries, people face immediate barriers to accessing banking, telecommunications, superannuation, taxation, employment, housing and other services, many of which are

significantly increasing their identification requirements in response to heightened scam, fraud and financial abuse risks. Moreover, in some cases lack of ID can itself be the cause of people's entry or return to the criminal justice system.[1]

This has direct implications for:
Target 10 – reduction in adult incarceration.

It is also closely connected to:

Target 8: employment/economic participation
Target 9: housing
Target 17: access to information/digital inclusion

The identification barriers ICAN sees in prison often begin much earlier in life. Universal birth registration and access to birth certificates should be understood as an upstream measure that prevents identification exclusion from becoming entrenched. The recent report[2] by Unicef Australia clearly demonstrates the social and economic benefits for families, communities and governments in achieving universal birth registration in Australia. Access to education; greater fitness and improved health amongst children; improved mental health and wellbeing for carers and children as well as reduced pressure on health and welfare systems were all identified as key benefits through the social return on investment analysis that was undertaken. These benefits highlight that ID has broader implications for the other socio-economic outcomes sought through the Close the Gap priorities.

For this reason, we also recommend that universal birth registration is elevated as a national priority.

Recommendation: Governments should elevate universal birth registration and access to birth certificates as a national priority, recognising identification as foundational infrastructure for participation in essential services and progress across Closing the Gap outcomes.

IDENTIFICATION IS FOUNDATIONAL TO SUCCESSFUL REINTEGRATION AND REDUCED RECIDIVISM

> *"Supporting people to get identification is not just about accessing services. It's about giving back to community, and creating pathways for safe and positive reintegration, without people feeling excluded.*
>
> *I've seen people experience stress, frustration, shame, and a sense of being left out when trying to navigate systems. For people to be seen and heard in the*

[1] Queensland Productivity Commission, *Inquiry into Imprisonment and Recidivism: Final Report* (August 2019) p.367 citing Payne (2007) p.415
[2] UNICEF Australia and Social Ventures Australia, *Certify Hope: The Social Return on Birth Registration*, (UNICEF Australia 2026)

darkest times in their lives can be empowering." – ***Elise Deemal, ICAN Financial Counsellor, Gugu Yimithirr & Bandjin***

ID can seem like a small administrative issue. In practice however, it determines whether a person leaving prison can participate independently in many of the systems that support a stable life. A substantial body of Australian and Queensland-specific research demonstrates that successful reintegration following imprisonment is contingent on access to stable housing, income support, financial services and health care.

A critical yet often underestimated enabler of this access is **possession of accepted photo identification (and birth certificate where needed) at the point of release.**

Without identification when they leave prison, people face immediate barriers to employment, housing, banking, telecommunications and other essential services that support lawful participation in the community and reduce the likelihood of further offending. In practical terms, people are unable to open a bank account, obtain a phone, access a key card to pay for goods and services, secure accommodation, obtain a tax file number, start work, receive wages, or access government services at the very point they are attempting to rebuild their lives. The resulting instability increases the likelihood of financial stress, homelessness and disengagement from support systems. Marginalisation also heightens risk of reoffending.

It's important to highlight that lack of ID can itself be the reason for the offending behaviour. This is highlighted through the justice reinvestment work done in the Northern Peninsula Area (NPA) in far north Queensland which established the NPA Licence and ID Muster Initiative ("the Muster"). The Muster brought together Elders, government agencies and community services to provide holistic support to people in the five NPA communities to obtain relevant ID documentation, including birth certificates and photo ID.[3] The purpose of the Muster was to "reduce Aboriginal and Torres Strait Islander people's unnecessary contact with the criminal justice system due to driving and vehicle related offences" which were found to account for "18% of offences committed in the NPA."[4]

The Australian Institute of Criminology (AIC) highlights the paradox that while entry to prison does not require official identification, exit into the community does:

> "*The removal from society into prison does not require an offender to produce official identification, but in order to access housing, benefits and other entitlements, returning prisoners must be able to provide suitable documentation.*"[5]

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[3] A Craft, S Steffens and J Scott, *Justice Reinvestment in the Northern Peninsula Area: The NPA Licence and ID Muster Initiatives* (QUT Centre for Justice Briefing Paper No 16, January 2022)
[4] Craft, Steffens and Scott, *Justice Reinvestment in the Northern Peninsula Area,* pp.1 & 2
[5] M Borzycki, *Interventions for Prisoners Returning to the Community* (Australian Institute of Criminology, 2005) p.35

The AIC further notes that prisoners are frequently released without adequate identification, resulting in "delays in accessing welfare benefits and other services".[6]

Lack of identification is not an isolated or jurisdiction-specific issue. As early as 2000, the NSW Legislative Council Standing Committee on Law and Justice found inadequate identification upon release as a key obstacle to post-release integration, alongside difficulties accessing welfare and maintaining payments for families.[7] The AIC emphasised that such barriers are common across Australian jurisdictions and must be addressed if recidivism rates are to be reduced.[8]

Access to government services, particularly Centrelink, Medicare and state-based supports, is heavily dependent on proof of identity. The Queensland Productivity Commission (QPC) explicitly identifies "inadequate personal identification, resulting in delays in accessing welfare benefits and other services" as a contributing factor to return to custody in Queensland.[9]

Submissions to the QPC Inquiry emphasised that relatively simple interventions could substantially improve reintegration outcomes. One submission noted that ensuring people leave prison with a driver's licence, Medicare card and birth certificate would "go a long way toward reducing recidivism."[10] The Commission echoed this view in its recommendations, calling for a minimum standard of post-release support that includes "adequate documentation for proof of identity" to access banking, health services and other supports.[11]

While Queensland Corrective Services (QCS) has attempted to respond to these recommendations with the provision of a QCS identification document issued when a person leaves prison, this document is not viewed as primary ID and not accepted by many essential services such as telecommunication providers, and some critical banking services (such as access to ATM or keycards). Nor is it sufficient, on its own, to obtain traditional TMR photo ID once a person has been released from prison. Furthermore, depending on the service you are trying to access, there is a time limit on how long this form of ID will be accepted by government and industry institutions. This is often not enough time for people to re-establish themselves as we know that obtaining stable housing and connecting to essential services (often without support and with additional barriers such as a criminal record), takes time. Building sufficient identification to meet '100 points' can in itself take months.

Prisoners have also reported to ICAN the significant shame attached to producing Corrective Services ID when asked for ID.[12]

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[6] Borzycki, *Interventions for Prisoners Returning to the Community*, p.35
[7] NSW Legislative Council Standing Committee on Law and Justice, *Crime Prevention through Social Support: Second Report* (NSW Parliamentary Paper No 437, 2000) cited in Borzycki, *Interventions for Prisoners Returning to the Community*, p.13
[8] Borzycki, *Interventions for Prisoners Returning to the Community*, p.52
[9] Queensland Productivity Commission, *Inquiry into Imprisonment and Recidivism: Final Report*, (August 2019) p.367 citing Payne (2007)
[10] Pack Submission 24, quoted in Queensland Productivity Commission, *Inquiry into Imprisonment and Recidivism: Final Report* (August 2019) p.375.
[11] Queensland Productivity Commission, *Inquiry into Imprisonment and Recidivism*, Recommendation 25, p.xxxvii.
[12] Indigenous Consumer Assistance Network and H Loban, *Prison ID Project Research Report: Strengthening Reintegration through Access to Identification* (ICAN 2026)

"Without ID [I] will use corrections ID and it's shame but I have no choice. … Without ID I'm in the dark."

Inability to provide identity documents is specifically identified as a major barrier to opening and maintaining access to bank accounts.[13] Anti-money laundering and counter terrorism financing laws require financial institutions to have rigorous identification and verification processes (know your customer (KYC)).

> "*Such requirements typically entail the collection of mandatory documentation (to open an account) that certain applicants do not have and/or cannot easily obtain.*[14]
>
> *This may include customers… who have recently been in prison…*"[15]

For people leaving prison, banking exclusion intersects with debt, fines and disrupted payment arrangements, increasing financial stress and the risk of reoffending. The QPC recognised this dynamic in recommending that QCS assist prisoners to address financial barriers, including those linked to imprisonment, where this would help reduce reoffending.[16]

However, the recent Performance Audit Report into Rehabilitating and Reintegrating Prisoners by the Queensland Audit Office highlights that QCS has work to do in providing effective reintegration supports, specifically finding that:

> "*Less than half of all prisoners that left custody in 2024–25 received pre-release support, such as help setting up bank accounts and support accessing services and legal advice.*"[17]

Relevantly, recent research from the United States demonstrates that there is a direct and statistically significant reduction in recidivism because of receiving ID at the point of release from prison, with a reduction of 7.7% within 3 years and 8.6% within 5 years. [18] The Michigan Re-Entry ID Program also provides an example of an identification initiative operating at scale.[19]

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[13] Queensland Productivity Commission, *Inquiry into Imprisonment and Recidivism*, Recommendation 25.

[14] Academy of Excellence in Financial Crime Investigation and Compliance, *Inclusion and Diversity: Addressing Financial Exclusion in the Age of Enhanced Compliance* (White Paper Series No 1, 2024) p.6.

[15] Academy of Excellence in Financial Crime Investigation and Compliance, *Inclusion and Diversity*, pp.13 & 15

[16] Queensland Productivity Commission, *Inquiry into Imprisonment and Recidivism*, Recommendation 21

[17] Queensland Audit Office, *Rehabilitating and Reintegrating Prisoners* (Report 1: 2026–27, 2026) p.2

[18] E Steffensmeier, 'Can I See Some Identification? The Impact of Receiving Identification on Recidivism upon Release from Prison' (2025) 106(6) *Social Science Quarterly*

[19] Coinciding with the implementation of a collaboration between the Michigan Department of Corrections (MDOC)and the Michigan Department of State (MDOS) to ensure people leaving prison receive state-issued identification before release, the state's recidivism rate fell to 21%, the lowest in the state's history: A Philippsen, *Michigan Re-Entry ID Program: A Case Study - Institute for Responsive Government* (Institute for Responsive Government 2026)

ICAN'S RESEARCH AND THE EXPERIENCES OF MEN IN LGCC

ICAN has been providing financial wellbeing services in Lotus Glen Correctional Centre for the past 6 years. LGCC is the northernmost Correctional Centre in Queensland and more than 70% of people in the prison identify as Aboriginal and/or Torres Strait Islander men. Many of the people in LGCC come from regional and remote north Queensland communities.

"Over the years we've learned that conversations about money almost always lead to conversations about identity, opportunity and belonging. Men repeatedly told us they couldn't access banking, housing, employment or even a mobile phone because they didn't have identification. We knew these weren't isolated stories—they pointed to a much larger systemic issue." – ***Sharon Edwards, Prison Financial Counselling Lead***

Through our work in LGCC we have come to understand just how many people leaving prison do not have the necessary ID documents to re-establish their lives. Intake and referral data for more than **500 people entering LGCC** over a three-month period found that close to **70% did not have valid photo ID** on entry. This indicates the scale of identification barriers among people entering custody and the corresponding need for effective pre-release ID support. Critically, this has a disproportionate impact on First Nations peoples, with 70% of the 500 people who answered the intake survey identifying as Aboriginal and/or Torres Strait Islander men.

The LGCC ID Project: a practical model of system reform

This data prompted ICAN to use a one-off donation to fund men in LGCC to access Transport & Main Roads issued ID prior to their release. In late 2024, ICAN launched the Prison ID Project under which a donation was used to:

1. Provide direct funding for Qld Transport adult photo ID applications through a four-way partnership between ICAN, QCS, the Australian Community Services Organisation (ACSO) which delivers the Men's Re-Integration Support Service (MRS) and the Department of Transport and Main Roads (TMR).

   Under this process:

   a. MRS (ACSO) support men who are due to leave LGCC to complete the TMR ID application through its MRS programs;
   b. QCS issues the prisoner's QCS identification form to TMR to support the application;
   c. QCS and TMR support processing of applications through the streamlined QCS-TMR MOU process;
   d. ICAN funds the applications through a streamlined payment system with TMR – with payment made through ICAN's dedicated Prisoner ID account.

The partnership helps people leave prison with primary photo ID which they otherwise could not afford.

2. Engage Dr Heron Loban of Mura Lagh Pty Ltd to undertake First Nations led research to understand the barriers for First Nations men in custody when accessing ID. The research findings were then published in the report: ICAN and Dr Loban, H (2026), *Prison ID Project Research Report: Strengthening Reintegration through Access to Identification*.

The Prison ID Project demonstrates that the barriers described below are solvable. It brings together a First Nations community organisation, corrective services, community reintegration services and the government agency responsible for issuing identification. Importantly, the model does not require individuals in custody to independently navigate systems that were previously inaccessible to them. Instead, participating organisations coordinate their existing functions so that applications can be completed and funded before release.

A systemic barrier should not depend on philanthropic funding to be resolved.
The experience at LGCC demonstrates both what is possible and the limitations of relying on one-off funding. More than 750 applications have already been funded through the project, with funding available for approximately another 300 applications. The underlying need, however, is ongoing. Sustainable government funding is required if access to identification is to become part of routine pre-release support rather than depend on temporary philanthropic funding.

The Prison ID Project can be replicated nationally by ensuring:

- accepted photo ID is obtained before release
- direct, sustainable government funding of application costs
- coordination between corrections and ID-issuing authorities
- community sector support to navigate documentation barriers
- the provision of culturally safe and trauma informed assistance
- streamlined application and payment arrangements.

We encourage the Commission to view our prison team's short, 5-minute "Speakin' Out" video about the Prison ID Project here: https://ican.org.au/campaigns/

The Research findings

> *"Conducting the Prison ID Project research and hearing the stories shared, I have realised that once you're in the system, you have a hard time getting out and staying out.*
>
> *The lack of support around necessities like ID and banking in remote areas can create a cycle of frustration and a sense of failure. Men who are trapped in this cycle sometimes say it's just better to be in custody, I have a roof, bed, hot water and food, I don't have to worry about navigating the system outside. It's hard to hear but it is the reality for some, it's sad that there are people that feel the need*

to go to prison just to feel safe." – ***Frederick Savage, Financial Counsellor, Torres Strait and Aboriginal man from Kubin Moa Is.***

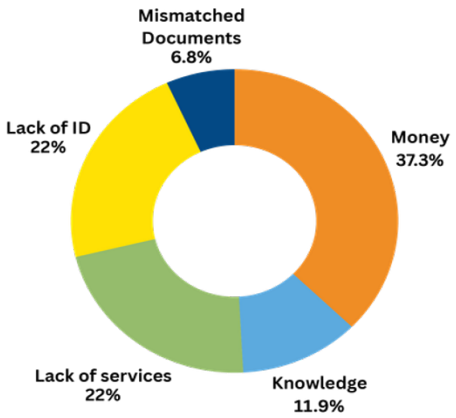
The Prison ID Project Research Report shines a light on much that ICAN and other community services already know about the barriers faced by First Nations people in remote communities when it comes to getting ID and the impact of not having ID. It found that:

- The overwhelming majority of survey participants entered custody without key forms of identification
- **81%** did not have a **current TMR-issued photo ID**
- **94%** did not have a **birth certificate**
- **78%** did not have a **Medicare card**
- More than half of participants came from remote or very remote communities where access to services is already limited

Barriers to getting ID

The barriers people face in getting ID are often systemic with cost being the primary barrier and the need to have ID to get ID, alongside lack of support services in remote communities, significantly impacting access. Literacy, language and digital barriers made application processes difficult to navigate without support and name discrepancies between different sets of ID, the colonial systems' failure to recognise cultural naming practices and documentation errors created additional challenges.

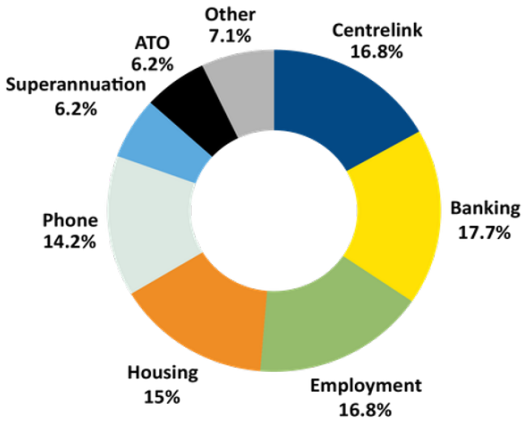
It is apparent from the people ICAN and MRS work with daily, as well as what was said by participants in the research, that support services are critical to people being able to navigate the ID application process. This is particularly the case for people with low literacy as well as people whose name appears differently on different sets of ID.



Leaving prison without ID

When it comes to leaving prison without ID, the research demonstrates that banking was the service most affected by lack of ID, followed by employment, Centrelink, housing and telecommunications. People struggled to access income, open bank accounts and receive payments. Lack of ID delayed access to housing and increased reliance on family members. Participants reported difficulty obtaining phones, which are essential for job searching, housing

applications and maintaining connections. They also reported that accessing employment was often impossible without recognised identification.



> *"Without ID I don't get my payments or housing. It's important. ID is everything."*

The hidden burden on families

The Prison ID Project Research Report also highlights that families become the primary safety net when people lack ID. Participants often relied on partners, aunties, cousins and extended family networks for the provision of bank accounts, phones, transport, housing and assistance navigating systems. While there is much strength and resilience in these supports, reliance on family can create stress and strain within already stretched households.

In addition, some workarounds, such as sharing ID or bank accounts, can create additional legal or compliance risks.

> *"I find it hard. I stay with family and its always overcrowded."*

> *"Aunties help me when I don't have any [ID] to activate phones"*

The challenges people are facing in accessing essential services without ID are becoming more acute as most government, financial and essential services move to online service provision and financial institutions strengthen identification requirements in response to increasing scam and fraud risks. The closure of bank branches across the country has also contributed to the inability of people to address ID and banking issues.

The human impact

> *"I have had the privilege to listen to the stories of hundreds of Aboriginal and Torres Strait Islander men*

In telling their identification story…conversations would at times shift to one about 'identity' or conversely, their invisibility. Painful stories emerged of the legacy of the Stolen Generation policies and the historical failure to recognise traditional Torres Strait Islander child rearing practices and other First Nations naming practices impacting ID." – ***Sharon Edwards, ICAN Prison Financial Counselling Lead***

Through this research, and through our prison team's daily conversations with men at Lotus Glen Correctional Centre, we have come to understand that ID is about much more than proving who you are to a government agency, bank or employer. For many people, it is bound up with identity itself: being recognised, being able to participate, and having greater control over your own life.

In supporting people to obtain ID and navigate systems that require it, our team has heard deeply painful stories about what can sit behind a missing document or a name that does not match: mothers seeking to protect their children during the Stolen Generations by recording alternative names on birth certificates; adults discovering their father's true name when seeing their birth certificate for the first time; and people repeatedly trying to meet identification requirements, only to walk away feeling that they had failed. These are not simple administrative inconsistencies. They reflect individual lives intersecting with the ongoing consequences of historical policies, family experiences and systems that can struggle to accommodate the realities of First Nations peoples' lives. When institutions treat ID only as a question of documentary compliance, they risk overlooking the human story that sits behind why those documents may be missing, inconsistent or difficult to obtain.

The experience of obtaining ID can therefore be profoundly different. Participants spoke about feeling **recognised, valued and more able to participate in everyday life** once they had identification:

"I first got my ID at [remote community] and it was a visiting service. I felt important now, people can identify me and it's a quicker process when I have ID."

"I've been telling my kids how important it is to get ID for their independence."

"Having ID will take you a long way and [you can] purchase the things you want in life."

"It was hard when I had no ID. When I got ID it felt like life got easier."

“ID is freedom to do what you want to do.”

“ID helps me get Centrelink and look for work.”

"It will change my life. Try to make me a better man."

These words capture something that administrative descriptions of identification barriers cannot. For the people we work with, ID can mean recognition, independence and the practical ability to participate in society. The painful experiences that can emerge through conversations about identification also mean that this work must be trauma-informed. Resolving discrepancies between names and records can require considerable time, trust and case management, particularly where different sources of identification do not align.

At other times, the practical intervention required from our team is relatively straightforward. Yet even a small amount of assistance can remove a barrier that a person has been unable to overcome alone. That contrast is important: the administrative task may sometimes be small, but its significance in a person’s life can be enormous.

MICHAEL’S STORY

Michael (not his real name) was remanded in custody. His father had passed away many years ago and he and his sibling were entitled to make a claim on their father’s Superannuation. However, due to significant hurdles that Michael faced, the claim remained unresolved when he entered custody. Once inside, these barriers were exacerbated as Michael had: no identification, difficulty completing the claim, unanswered questions about his father’s details which were required for the claim, uncertainty about whether his bank account remained open, and limited ability to communicate with the superannuation company. Overwhelmed by these requirements, he had stopped pursuing the claim.
After unsuccessful written correspondence and being unable to speak with Michael directly, the superannuation company contacted the prison outreach financial counselling service. Over eight weeks, ICAN met with Michael, confirmed his wish to proceed and worked collaboratively with the superannuation company, Queensland Corrective Services and re-entry support services to overcome the barriers.
Together with Michael, the financial counsellor coordinated the following actions across agencies:

- *Completed the superannuation claim form with Michael.*
- *Requested identification issued by Corrective Services.*
- *Applied for and funded Queensland photo identification through the memorandum of understanding between Queensland Corrective Services and the Department of Transport and Main Roads.*

- *Arranged for all documents to be signed by a Justice of the Peace.*
- *Mailed original documents to the superannuation company.*
- *Confirmed Michael's bank account details and account status.*

Approximately ten hours of coordinated case management resulted in Michael receiving $165,000 which he planned to use to establish his contract mustering business through the purchase of a vehicle, trailer and equipment. Michael, now released from custody, took up an immediate opportunity to gain further station work & business experience before venturing out on his own. It also meant his sibling was finally able to receive their share of the monies their dad had left them.

Access to identification was a critical step in progressing the claim. This case demonstrates how practical assistance, funded photo identification and sustained interagency collaboration can overcome significant barriers for a person in custody and enable access to substantial financial entitlements. Together, identification as a tool for accessing services and entitlements, and the money to establish a livelihood, provided a stronger foundation for life after release, giving Michael an opportunity to build an independent, sustainable future beyond custody.

The Prison ID Project Research Report highlights the above need for consistent and appropriately resourced support for people to access ID in both the prison and community settings. This recommendation aligns with the recommendation of the UNICEF Australia report which highlights the importance of well-resourced, targeted and culturally safe and sensitive community outreach and support.[20]

ICAN's experience also demonstrates the important role of First Nations organisations in identifying barriers that may be largely invisible to mainstream systems and in supporting people to navigate those systems safely. Sustainable investment in community-controlled organisations should therefore form part of government responses to identification exclusion.

Recommendation: Governments should invest in coordinated, sustained partnerships with First Nations organisations and relevant government agencies to support people to obtain identification and birth certificates in culturally safe and trauma-informed ways, including in regional and remote communities.

WHY PRISONS ARE UNIQUELY PLACED TO HELP

People should not have to go to prison to obtain the support they require to live on the outside. However, Corrective Services departments have a responsibility to rehabilitate people in their custody and ensure that they can integrate safely back into the community.[21] For this reason, Corrective Services departments have a number of programs and supports in place that people

[20] Indigenous Consumer Assistance Network and Loban, *Prison ID Project Research Report*, 21; UNICEF Australia and Social Ventures Australia, *Certify Hope: The Social Return on Birth Registration* (2026) pp.12, 25.

[21] Queensland Audit Office, *Rehabilitating and Reintegrating Prisoners*, p.2

may not otherwise access outside of the prison setting. As a result, prisons offer a 'unique opportunity' to address identification barriers before a person is released.[22] People are in an environment where support can be coordinated and pre-existing systems streamline the process. It also ensures early intervention before release, reducing post-release barriers and supporting continuity of services. As demonstrated through ICAN's Prison ID Project, there is an opportunity for partnerships between QCS, government agencies and community organisations to offer a practical pathway to improve outcomes.

The prison environment accommodates some of the most vulnerable and marginalised in our community. Without support, many are unable to overcome the significant barriers required to access ID prior to, and post release. The need and desire, however, is evidenced through the significant waitlist for ID support at LGCC. Providing this assistance in prison offers an opportunity to address that need before release.

Recommendation: All people leaving prison who require it should be supported through funding and assistance to obtain accepted primary photo identification and their birth certificate before release.

CONCLUSION

Access to identification may appear to be a small administrative issue, but ICAN's experience demonstrates how seemingly routine government systems can create profound barriers to participation when they are not designed around the circumstances of the people who need to use them. For First Nations people leaving prison, those barriers can affect access to banking, housing, income, employment and essential services at precisely the time when stability and support are most important.

The experience at Lotus Glen also demonstrates that these barriers are solvable. Governments, First Nations organisations and service providers can work together to ensure people leave custody with identification that is recognised by the institutions they need to engage with. This is the kind of practical system transformation contemplated by Priority Reform 3. Closing the Gap will ultimately depend not only on new programs, but on whether governments identify and change the everyday systems and processes that continue to produce unequal outcomes.

Recommendation 1: Identification before release
All people leaving prison who need recognised identification should be supported, through funding and practical assistance, to obtain accepted primary photo identification and their birth certificate before release.

Recommendation 2: Sustainable community-based identification support
Governments should invest in coordinated, sustained partnerships with First Nations organisations and relevant government agencies to support people to obtain identification and

[22] Indigenous Consumer Assistance Network and Loban, *Prison ID Project Research Report*, p.21

birth certificates in culturally safe and trauma-informed ways, including in regional and remote communities.

Recommendation 3: Universal birth registration
Governments should elevate universal birth registration and access to birth certificates as a national priority, recognising identification as foundational infrastructure for participation in essential services and progress across Closing the Gap outcomes.

Together, these measures would provide a practical demonstration of **Priority Reform 3** by removing structural barriers within mainstream systems, while supporting progress towards **Target 10** and other socio-economic outcomes.

We hope the above is of assistance and appreciate the opportunity to contribute to this important review.

Please contact Jillian Williams if further information would assist.

Kind regards

Aaron Davis
CEO
Indigenous Consumer
Assistance Network Ltd