Closing the Gap Review 2026
Productivity Commission
GPO Box 1428
Canberra City ACT 2601

2 November 2026

Dear Productivity Commission,

The Healing Foundation welcomes the opportunity to provide this submission on the **National Agreement on Closing the Gap Review 2026**.

The Healing Foundation is the national Aboriginal and Torres Strait Islander organisation that elevates the voices and lived experiences of Stolen Generations survivors, their families and communities. We work closely with Stolen Generations Organisations (SGOs) that tirelessly support survivors and descendants. Founded in 2009 following national consultation and the landmark *Bringing Them Home* report, The Healing Foundation was established to implement the key report recommendation: that healing must be integrated into services for survivors.[1]

We provide expert advice on the needs of ageing survivors, support survivor-led healing projects, and help educate about the continuing impacts of Australia's Stolen Generations history. We are governed by an Aboriginal and Torres Strait Islander Board and Executive, guided in our work by Stolen Generations Organisations to support survivors to tell their stories and drive their healing. We work cross-sector with governments, policy makers, diverse organisations and workforces to understand and take accountability for their role in meeting the needs of Stolen Generations survivors and intergenerational healing.

Since the *Bringing Them Home* report was handed down nearly 30 years ago, there has been no nationally coordinated response to monitor the implementation of the report's recommendations. Our February 2025 report, *'Are you waiting for us to die?' The unfinished business of Bringing Them Home*, analysed implementation of the recommendations and found that only **six percent** have been entirely fulfilled.

Our recent research collaboration with the Australian Institute of Health and Welfare (AIHW) reaffirmed that survivors and descendants have higher needs across health and wellbeing, and face poorer economic and social outcomes compared to Aboriginal and Torres Strait

[1] Human Rights and Equal Opportunity Commission. (1997). *Bringing Them Home: National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children from Their Families.* https://humanrights.gov.au/?a=51037

Islander adults who were not forcibly removed.[2] The report found that survivors were 2.7 times as likely as other Aboriginal and Torres Strait Islander people aged 50 and over to experience severe or profound disability, reinforcing the urgency of appropriate care and support. Considering these ongoing gaps and drawing on the priorities in our recent action plan, *From Sorry to Action,* The Healing Foundation makes the following recommendations to strengthen implementation, accountability and reporting under the National Agreement.

Recommendations

1. **Make Stolen Generations survivors and descendants visible in Closing the Gap implementation**. Explicitly recognise Stolen Generations survivors and descendants in Closing the Gap implementation and align relevant actions in *From Sorry to Action* with Closing the Gap implementation plans, responsibilities, timeframes and funding.

2. **Implement the independent mechanisms committed to under clause 67 in each jurisdiction.** Include survivors, descendants and SGOs in their design and operation and make government responses to survivors' needs an explicit part of monitoring and public reporting on progress, delays and gaps.

3. **Increase survivor and SGO participation in governance and funding decisions.** SGOs, including Link-Up organisations, should be involved early in policy and program design, with the information and resources needed to participate. Governance decisions and progress should be communicated back to communities.

4. **Publish a clear map of relevant funding and review progress regularly.** Governments should report on funding, implementation and outcomes, using regular continuous improvement reviews and clear indicators developed with Aboriginal and Torres Strait Islander organisations. Funding arrangements must support the long-term capacity of SGOs.

5. **Strengthen Indigenous Data Governance and survivor-related reporting.** Work with survivors, descendants and SGOs to set data priorities and govern how data is collected, interpreted, accessed and used. Governments should address reporting gaps, fund SGO-led research and data capacity, and develop survivor-informed measures of healing, cultural connection, social and emotional wellbeing, and access to culturally safe support alongside the headline suicide-reduction target.

[2] AIHW. (2026). *Aboriginal and Torres Strait Islander Stolen Generations survivors and descendants: updated analyses for 2022-23.* https://www.aihw.gov.au/reports/indigenous-australians/first-nations-stolen-generations-2022-23/contents/stolen-generations-survivors/introduction

From Sorry to Action: A plan to act on Bringing Them Home

The Healing Foundation released a new Action Plan[3] that builds on the findings of *Are you waiting for us to die? The unfinished business of Bringing Them Home.*[4] The Plan sets out practical, survivor-informed actions to address long-standing gaps across five priority areas:

1. Health, social and emotional wellbeing, and ageing.
2. Records, redress, and acknowledgements.
3. Education, research, and data.
4. Sector support and workforce development.
5. Governance and accountability.

Importantly, the actions and outcomes in *From Sorry to Action* align with all four priority reforms to ensure the ongoing impacts of forced removal on survivors and descendants are properly recognised and addressed across policy, systems, service delivery, data and research.

From Sorry to Action: Alignment with Closing the Gap

Survivors must be visible in Closing the Gap governance and reporting, with strengthened accountability for progress through the Joint Council on Closing the Gap.[5]

Priority Reform 1: Formal partnerships and shared decision making

- Ensure Stolen Generations Organisations (SGOs) and survivors are represented in policy partnerships and decision-making in relation to access to records and redress, health, social and emotional wellbeing (SEWB), and aged care, along with monitoring and accountability on implementation of the National Agreement and the *Bringing Them Home* report recommendations.

Priority Reform 2: Building the community-controlled sector

- Implement urgent sustained, long-term capacity building and increased investment in SGOs and workforces to deliver community-led healing services and other supports for survivors and descendants, including reunions, records access, and SEWB support.

Priority Reform 3: Transforming government organisations

- Establish and ensure truth-telling, recognition, awareness, and culturally safe, trauma-informed support for survivors across government organisations and systems, including records, redress, education, health care and aged care.

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[3] The Healing Foundation. (2026). *From Sorry to Action: A plan to act on Bringing them home (2026-2028).* https://healingfoundation.org.au/media/xmqdwbve/from_sorry_to_action.pdf

[4] The Healing Foundation. (2025). *Are you waiting for us to die? The unfinished business of Bringing them home.* https://healingfoundation.org.au/resources/are-you-waiting-for-us-to-die/

[5] The Healing Foundation. (2026). *From Sorry to Action: A plan to act on Bringing them home (2026-2028).* https://healingfoundation.org.au/media/xmqdwbve/from_sorry_to_action.pdf

Priority Reform 4: Shared access to data and decision-making

- Strengthen Indigenous Data Governance by giving survivors, descendants and SGOs authority over data priorities, interpretation, access and use, alongside improved records access and information sharing between governments and communities.

Implementation of the *From Sorry to Action* Plan will support progress towards Closing the Gap targets by improving healing, social and emotional wellbeing, and health of survivors and descendants. Our recently published analyses indicated survivors and descendants comprise up to half the adult Aboriginal and Torres Strait Islander population, meaning targeted action could make a tangible difference for whole communities.[6] Further strategy and action will be needed beyond the scope and timeframe of the Plan to ensure full implementation of the Bringing Them Home recommendations, and healing and reparations for survivors and descendants.

How are governance bodies accountable to Aboriginal and Torres Strait Islander people and communities?

- The Healing Foundation, as a member of the Coalition of Peaks, works across several policy areas relevant to the National Agreement. However, survivors are not visible as a distinct group in the National Agreement. Accountability requires survivors, descendants and Stolen Generations Organisations, including Link-Ups, to influence decisions and assess whether implementation reflects their priorities.
- Like many organisations, we have found that power sharing between governments and Aboriginal and Torres Strait Islander organisations is not yet embedded in practice. It is often inconsistent, depends on individual officials, and can be disconnected from national and state or territory policy and funding discussions involving SGOs.
- The 2025 Independent Aboriginal and Torres Strait Islander-led Review calls for stronger relationships, community feedback and accessible two-way communication.[7] It specifically recommended strengthening the visibility and recognition of Stolen Generations survivors across the implementation of the National Agreement (Recommendation 9a).
- Further, the review called for consideration of explicit recognition of survivors' cultural repair and intergenerational healing needs under clause 21, and prioritisation of disaggregated survivor data under clause 93.[8]
- The Healing Foundation strongly supports this, and recommends formal, ongoing roles for survivors and SGOs in relevant governance and funding decisions, supported by sufficient information, time and resources to participate fully.

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[6] AIHW. (2026). *Aboriginal and Torres Strait Islander Stolen Generations survivors and descendants: updated analyses for 2022-23.* https://www.aihw.gov.au/reports/indigenous-australians/first-nations-stolen-generations-2022-23/contents/stolen-generations-survivors/introduction

[7] Jumbunna Institute for Indigenous Education and Research. (2025). *Closing the Gap: The Independent Aboriginal and Torres Strait Islander-led Review.* (p.14-16, 19). https://www.coalitionofpeaks.org.au/independent-review-of-closing-the-gap

[8] Closing the Gap. (2020). *National Agreement on Closing the Gap.* (p. 4, 44) https://www.closingthegap.gov.au/sites/default/files/2021-05/ctg-national-agreement_apr-21.pdf

- *From Sorry to Action* provides practical accountability measures: incorporating relevant actions into jurisdictional implementation plans, annual Joint Council consideration of The Healing Foundation's progress report, and a standing Stolen Generations agenda item.[9]
- Effective accountability relies on transparent communication about decisions, funding commitments, and progress, supported by clear pathways for communities to provide feedback, raise concerns and receive responses. It further relies on Stolen Generations Organisations, survivors and descendants having meaningful opportunities to inform and influence the policy decisions that affect them.

What is affecting progress towards establishing independent mechanisms to support and monitor transformation?

- The Healing Foundation supports implementation of the independent mechanisms committed to under clause 67. Survivors, descendants and SGOs should be included in mechanism design and operation, with government responses to survivors' needs explicitly included in scrutiny of the mechanisms. For survivors, effective oversight must connect commitments to delivery. As outlined in *From Sorry to Action*, we propose regular public reporting identifying responsible agencies, committed funding, timeframes, progress, delays and corrective action.[10]
- A consolidated picture of funding across relevant actions in *From Sorry to Action* would help survivors and SGOs assess whether commitments are adequately resourced and sustained. Reporting on allocations, duration and coverage would make funding gaps evident. Regular reviews with survivors and SGOs would establish whether investment is translating into improved services and outcomes, and where changes are needed.
- The 2025 Independent Review identifies the overdue implementation of clause 67 as a priority, and calls for independent mechanisms to support, monitor and report on the transformation of mainstream agencies and institutions (Recommendation 4). This delay leaves a gap in independent scrutiny of government transformation, which limits opportunities for survivors and SGOs to challenge government assessments of progress and seek accountability for gaps in implementation.
- Recommendation 9(a) also calls for greater recognition of Stolen Generations survivors across the implementation of the National Agreement.[11] Applying this recommendation to independent oversight would enable scrutiny of how government implementation responds to survivors' needs and the priorities identified in *From Sorry to Action.*

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[9] The Healing Foundation. (2026). *From Sorry to Action: A plan to act on Bringing them home (2026-2028).* (p.33.) https://healingfoundation.org.au/media/xmqdwbve/from_sorry_to_action.pdf

[10] The Healing Foundation. (2026). *From Sorry to Action: A plan to act on Bringing them home (2026-2028).* (p.33.) https://healingfoundation.org.au/media/xmqdwbve/from_sorry_to_action.pdf

[11] Jumbunna Institute for Indigenous Education and Research. (2025). *Closing the Gap: The Independent Aboriginal and Torres Strait Islander-led Review.* (p. 19). https://www.coalitionofpeaks.org.au/independent-review-of-closing-the-gap

How are parties working to incorporate Indigenous Data Governance into government data collection and management? How might these approaches be strengthened?

- The Healing Foundation's collaboration with AIHW contributes to the growing evidence-base on survivor and descendant outcomes and data limitations.[12] Drawing on this evidence and the priorities in From Sorry to Action, the following proposals identify how Indigenous Data Governance in government data collection and management should be strengthened for survivors, descendants and SGOs.
- *From Sorry to Action* identifies three priorities under actions 5.2.1-5.2.3: reviewing existing survivor, descendant and SGO data; including survivor and, where possible, descendant data in the Closing the Gap dashboard; and prioritising regular reporting through the Data Policy Partnership.[13]
- The Healing Foundation proposes implementing these actions through Indigenous Data Governance arrangements that give survivors, descendants and SGOs authority over data priorities, interpretation, access, and use of data about their experiences, needs, histories, outcomes and service delivery.
- As outlined in our report *Are you waiting for us to die?,* a systematic response with sustained investment in SGO research, workforce capability and secure infrastructure is needed to effectively support participation in Indigenous data governance. [14]
- A more coordinated approach to collecting and sharing data is also necessary, as outlined in our Action Plan, to coincide with existing commitments to Indigenous Data Sovereignty. Reporting needs to capture the diversity and complexity of survivor and descendant experiences, recognising that people may belong to both groups. A more nuanced understanding of these experiences, needs and outcomes would support more targeted policy responses.
- The 2026 AIHW report highlights limitations in existing survey data, including the exclusion of people living in residential aged care and other non-private dwellings. As survivors age, survey data alone will be insufficient to adequately capture their circumstances, needs and outcomes.
- Action is needed now to establish new data collection processes embedded in service delivery and enable appropriate linkage across services, supported by Indigenous Data Governance. SGOs have reported to the Healing Foundation that government and other funder reporting requirements impose administrative burdens and do not always meet the information needs of organisations and their communities.

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[12] AIHW. (2026). *Aboriginal and Torres Strait Islander Stolen Generations survivors and descendants: updated analyses for 2022-23.* https://www.aihw.gov.au/reports/indigenous-australians/first-nations-stolen-generations-2022-23/contents/stolen-generations-survivors/introduction

[13] The Healing Foundation. (2026). *From Sorry to Action: A plan to act on Bringing them home (2026-2028).* (p.33.) https://healingfoundation.org.au/media/xmqdwbve/from_sorry_to_action.pdf

[14] The Healing Foundation. (2025). *'Are you waiting for us to die?' The unfinished business of Bringing Them Home.* (p.9). https://healingfoundation.org.au/media/ak5niup3/bth_report_are-you-waiting-for-us-to-die-final-2025-1.pdf

- Indigenous Data Governance would enable survivors and SGOs to shape data collection and reporting around these needs. Longer-term funding would support sustained investment in the staff, skills and systems required to collect, manage and use this data.
- The Independent Review reinforces this approach through recommendations 7 and 9(a), including prioritising the existing clause 93 commitment to disaggregated survivor data reporting.[15]

Are the socio-economic outcomes and targets appropriately defined and measured?

- *From Sorry to Action* centres health, social and emotional wellbeing (SEWB), ageing and healing. Assessing progress towards these outcome priorities requires measures and reporting that make survivor and descendant experiences visible.
- Outcome 14 sets a broad ambition for Aboriginal and Torres Strait Islander people's social and emotional wellbeing. The headline target, however, measures suicide reduction and captures mortality at the most severe end of distress. This is an important measure, but it does not capture the full scope of SEWB. Measures of psychological distress, wellbeing and access to support can identify unmet needs earlier and inform preventative action.
- Broader outcome capture and measurement could help assess progress towards the Action Plan's priorities, including healing, cultural connection and access to culturally safe support.
- AIHW's adjusted analysis found survivors were 1.9 times as likely as other Aboriginal and Torres Strait Islander people aged 50 and over to report high psychological distress. Adult descendants were 1.3 times as likely to report high psychological distress and 1.5 times as likely to experience problems accessing government services compared to other Aboriginal and Torres Strait Islander adults.[16] These findings reinforce the value of reporting on wellbeing, service access and community connections under the SEWB outcome.
- Gaps in existing survey data limit how comprehensively survivor needs and outcomes can be measured. The 2026 AIHW report identifies unanswered removal questions and the exclusion of people living in residential aged care and other non-private dwellings as limitations.[17]
- As survivors age, addressing these gaps through improved service data collection and appropriate data linkage is increasingly urgent to assess progress against the Action Plan's ageing, health and healing priorities.

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[15] Jumbunna Institute for Indigenous Education and Research. (2025). *Closing the Gap: The Independent Aboriginal and Torres Strait Islander-led Review.* (p. 19). https://www.coalitionofpeaks.org.au/independent-review-of-closing-the-gap

[16] AIHW. (2026). *Aboriginal and Torres Strait Islander Stolen Generations survivors and descendants: updated analyses for 2022-23.* https://www.aihw.gov.au/reports/indigenous-australians/first-nations-stolen-generations-2022-23/contents/stolen-generations-survivors/introduction

[17] AIHW. (2026). *Aboriginal and Torres Strait Islander Stolen Generations survivors and descendants: updated analyses for 2022-23.* https://www.aihw.gov.au/reports/indigenous-australians/first-nations-stolen-generations-2022-23/contents/stolen-generations-survivors/introduction

Stolen Generations survivors and descendants continue to experience the impacts of past and present disconnection from culture, community and identity. These impacts are compounded by the failure to fully implement the recommendations of *Bringing Them Home* and the continued absence of survivors and descendants from national policy frameworks and reporting. Governments must translate recognition into resourced action: embed relevant *From Sorry to Action* commitments in implementation plans, implement independent oversight with survivor participation, and report on measures of healing and wellbeing that reflect survivors' and descendants' priorities. The needs of ageing survivors make timely implementation urgent.

The Healing Foundation welcomes the opportunity to discuss our submission further. For additional information, please contact Sarah Davidson

Yours sincerely,

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Acting Chief Executive Officer