



Indigenous Data Network:

PUTTING INDIGENOUS DATA BACK IN
COMMUNITY HANDS

Indigenous Data Network - Indigenous Studies Unit
Melbourne School of Population & Global Health
The University of Melbourne VIC 3010



Indigenous Evaluation Strategy
Productivity Commission
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23 August 2019

Dear Commissioner,

RE: JUNE 2019 INDIGENOUS EVALUATION STRATEGY ISSUES PAPER: QUESTIONS ON DATA EVALUATION

This submission to the June 2019 Indigenous Evaluation Strategy (IES) Issues Paper is made on behalf of the Indigenous Data Network (IDN; <https://mspgh.unimelb.edu.au/centres-institutes/centre-for-health-equity/research-group/indigenous-data-network>).

The IDN is an initiative of the Indigenous Studies Unit, Melbourne School of Population and Global Health, University of Melbourne. The IDN is overseen by a steering committee of senior Indigenous and non-Indigenous academics, and is staffed by experts in Indigenous data governance.

The objective of the IDN is to establish a national framework for the coordination of Indigenous-led organisations and others engaged in the holding, controlling, and processing of data generated by and about Indigenous Australians. The IDN maintains partnerships with a number of peak and regional Commonwealth and state/territory government agencies, and Indigenous-led organisations, which are engaged in Indigenous data management. Further information about the IDN can be found on the IDN website¹.

Submission Points: Questions on Data Evaluation

Notwithstanding the broad ranging importance of multiple points in the June 2019 IES Issues Paper, this submission focuses exclusively on the Issues Paper's questions on data evaluation: *'To what extent are current data governance arrangements effective? What can be done to improve arrangements?'*

Due to the absence of a coherent national regulatory framework, current arrangements with regard to Indigenous data governance among Commonwealth agencies and Commonwealth-funded organisations are broadly ad hoc. Each agency and organisation is currently responsible for making its own data governance arrangements within the

¹ <https://mspgh.unimelb.edu.au/centres-institutes/centre-for-health-equity/research-group/indigenous-data-network>

parameters of discretely relevant existing legislation. While some agencies and organisations have developed sophisticated and effective governance arrangements, others have no arrangements in place at all.

This inconsistency in Indigenous data management practices significantly undermines the efficacy of any evaluation strategy with regard to data governance.

The view of the IDN is that the most important factor for developing a national Indigenous data governance framework, is the negotiation of a set of common national standards to which Commonwealth agencies, Commonwealth-funded organisations and Indigenous-led organisations more broadly, may commit. Such standards should include agreed terms and definitions, as well as agreed benchmarks for best practice in the holding, controlling, and processing of data generated by and about Indigenous Australians.

The IDN has already developed a preliminary framework of standard terms, definitions and best practice for Indigenous data governance. These standards have been developed with reference to leading Australian and international instruments and are documented in the IDN's May 2019 Draft Position Paper² and Draft Ethics and Protocols statement³.

In summary, these standards conform with the following Australian and international guidelines:

1. The Institute for Indigenous Knowledge's Charter to Recognise the Rights of Indigenous Knowledge Holders⁴
2. The United Nations' Declaration on the Rights of Indigenous Peoples⁵
3. FAIR Guiding Principles for Scientific Data Management and Stewardship⁶
4. The Five Safes framework⁷

The IDN recommends that a special working group be established by the Productivity Commission to advise on the development of a targeted evaluation framework with regard to Indigenous data governance practices among Commonwealth agencies and Commonwealth-funded organisations. The significant advances already made by the IDN in this domain mean that its inclusion in any such working group should be a priority.

Yours Sincerely,

Dr James Rose
National Coordinator
Indigenous Data Network

² https://mispgh.unimelb.edu.au/data/assets/pdf_file/0020/3072116/IDN-Position-Paper-DRAFT-190517.pdf

³ https://mispgh.unimelb.edu.au/data/assets/pdf_file/0016/3072121/IDN-Ethics-and-Protocols-DRAFT-190517.pdf

⁴ <https://about.unimelb.edu.au/newsroom/news/2019/august/university-of-melbourne-launches-global-indigenous-knowledge-institute>

⁵ <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>

⁶ <https://www.nature.com/articles/sdata201618>

⁷ <https://uwe-repository.worktribe.com/output/914745>