

Appendix 1 – What we heard

Methodology

VACCA led consultations with ACCOs across each of the EIFF portfolios to inform the EIFF Cultural Safety Framework. This collaborative approach ensured meaningful community input and guaranteed that the framework would be practical and guided by community experiences and needs, which was seen as essential to achieving the outcomes of the EIFF Cultural Safety Framework.

Given this emphasis, consideration was given to:

- ensuring a range of ACCOs were contacted
- checking ACCOs had the capacity to contribute
- minimising the burden on ACCOs, by leveraging existing information and resources, respecting previous and current commitments of self-determination, and conducting a review of sector documents
- undertaking a second round of consultations which refined and validated initial findings with new information.

These yarns revolved around several critical questions:

- *Where are we now?*
- *How can we shape the future of cultural safety?*
- *What specific supports are needed and from whom?*
- *What has and has not worked in previous EIFF initiatives?*
- *How do we ensure accountability now, and throughout the implementation and review process?*

The below consultation list includes ACCOs that responded to the request and had the capacity to engage. Consultation invites covered a range of ACCOs in education, health, child and family welfare, early childhood, justice, and family violence.

Table 2: List of ACCOs consulted

ACCO	Description
Aboriginal Housing Victoria	Aboriginal community controlled housing organisation
Bendigo and District Aboriginal Co-Operative	Aboriginal community controlled organisation providing various services
Djirra	Aboriginal community controlled family violence organisation
VACCA	Aboriginal community controlled organisation providing various services
Victorian Aboriginal Children and Young People's Alliance	Peak body representing Aboriginal community controlled organisations providing family, child and care services
Victorian Aboriginal Community Controlled Health Organisation	Peak body representing Aboriginal community controlled health services
Yappera Children's Service Co-Operative Ltd	Aboriginal community controlled early childhood organisation

'ACCOs' refer to organisations across a diverse range of sectors that are governed and operated by Aboriginal people, including peak bodies, place-based organisations, and may also be represented by alliances comprising a number of ACCOs.

The development process role models how essential the expertise of ACCOs are as pivotal decision makers. This ensures that this Framework enables and strengthens a culturally informed approach to service delivery, which inherently includes trauma-informed practices. Culturally informed and trauma-informed services are interconnected and cannot be separated.

Amplifying ACCO Voices

The following section outlines the themes that emerged from the ACCO consultations on the EIIF and broader government engagement and processes.

It's important to note, that to ensure we are listening to the voice of ACCOs we have used the language from the consultations. While there may be complex reasons underpinning examples below, this section is intended to provide visibility on the experiences of ACCOs as expressed by ACCOs, to support departments and government in addressing the impacts.

This section outlines the barriers identified during consultation, explains broadly their corresponding **in practice** implications, and sets out proposed **solutions** that were highlighted by ACCOs.

It's also important to recognise that not all government departments face the same barriers, and some departments may already be on the journey to enacting the solutions below, alongside other approaches to advancing self-determination. However, variations of these common themes span all sectors, with some departments advancing self-determination more than others. We suggest exploring these themes in the context of specific departments and sectors, and the relationships departments have with the specific ACCOs that they work alongside.

Some of the below barriers for reform include an example of 'good practice' as identified the ACCOs. These are illustrative and aim to highlight one example of progress towards overcoming some of the below barriers, recognising many other good practice examples exist.

Lack of Aboriginal-led decision-making within budget processes

ACCOs expressed that there is a dire need to enhance Aboriginal led decision-making systematically across government departments, at every stage of the budget process from submission, to program design, to outcomes. This is to ensure that there is a clear understanding of the needs of Aboriginal people and culturally appropriate service delivery. When Aboriginal decision-making is less integrated or valued in budgetary decisions, ACCOs felt the ability for Aboriginal communities to be self determining in how resources are allocated, is undermined

Consultations also advocated for the importance of Aboriginal decision-making in funding allocation, emphasising the necessity for a distinct governance process for when projects impacting Aboriginal communities arise. For ACCOs, this recognition called for integrating Aboriginal perspectives more effectively into government decision-making frameworks.

Quotes from ACCO consultations:

"There is a need to understand the true needs [of community], but also nobody's equipped in Treasury to my knowledge, to actually truly understand the needs and how that can be addressed through these [budget] processes. And so how can somebody truly make a decision about value for money? Because you're not comparing apples with apples, so to speak..."

"Aboriginal decision-making in funding allocation is imperative. There needs to be a trigger point for a different governance decision-making process when projects impacting Aboriginal communities arise."

GOOD PRACTICE EXAMPLE:

The Aboriginal Children's Forum (ACF) in the Department of Families, Fairness and Housing (DFFH) exemplifies strong Aboriginal-led collaborative governance. The ACF Secretariat sits within DFFH - a forum that is not independent of government. However, ACCOs lead these conversations and decision-making processes.

As raised by ACCOs, lack of Aboriginal-led decision-making *in practice* this means:

Neglect of specific Community needs: Budget allocations may overlook the local needs of Aboriginal communities, leading to funding gaps in essential services.

Absence of Aboriginal perspectives in funding allocation decisions due to inadequate understanding of community needs within Treasury and departments.

Limited ability to assess the value for money in funding proposals without accurate knowledge of needs, context and work happening on the ground.

Solutions raised:

ACCOs proposed several solutions to address these challenges and enhance support for securing adequate funding, meeting community needs and advancing Aboriginal self-determination through Aboriginal decision making.

Establish governance structures with ACCOs within Treasury and line departments that have specific decision-making authority to ensure meaningful participation and representation of Aboriginal communities in decision making.

Where a separate departmental government process does not exist, establish this specifically for funding allocation related to projects impacting Aboriginal communities that recognise the expertise and leadership of ACCOs and reduce the bureaucratic burden associated with justifying funding requests.

Implement a standardised template or decision-making matrix that accounts for the diversity of Aboriginal community needs, enabling more accurate comparisons and evaluations of funding proposals.

Systemic failure to implement existing government commitments to self-determination

Consultations highlighted that departments often struggle to fully implement their commitments to self-determination for Aboriginal communities. This includes efforts outlined in key Victorian Government Frameworks like the VAAF, the Self-Determination Reform Framework, and commitments to transfer funds to Aboriginal organisations. ACCOs felt the lack of progress by departments towards securing adequate funding for ACCOs posed significant barriers.

As a result, ACCOs feel they are forced to repeatedly explain the historical context and principles of self-determination and community control when submitting budget bids and advocating for appropriate funding. This process consumes valuable time and resources that could be better spent on service delivery. ACCOs felt that it reflected a lack of full acknowledgment and implementation from departments, which results in increased cultural load and an undermining of ACCOs efforts.

Quotes from ACCO consultations:

“But when you do a budget bid, you've gotta go back and explain things as if [Government commitment to self-determination] isn't there, like you've gotta go back and start from the beginning and explain why Aboriginal people are facing more disadvantage.”

“So instead of starting back at explaining, you could just take that as a commitment that's already there and therefore has to be met with appropriate funding bucket that assumes that the things that will be funded under that bucket are both self-determined and from a community-controlled perspective.”

“So much time is spent having to repeat back to departments constantly their own policies on Aboriginal self-determination that they don't implement.”

As raised by ACCOs, systemic failure to implement existing government commitments to self-determination *in practice* this means:

Resource drain: Constantly having to justify the principles of self-determination and community control consumes valuable time and resources that could be better spent on service delivery.

Inadequate financial support: Limited financial resources hinder the ability of ACCOs to meet all of their community needs. The lack of consideration for Aboriginal self-determination in service target allocations impacts community outcomes.

Lack of advocacy for funding: ACCOs often engage in essential but unfunded activities like advocacy, community engagement, and cultural awareness, which receive no financial support, further straining their resources.

Solutions raised:

Align the Victorian state budget process with the range of other key policy frameworks and processes that recognise and uphold the right to self-determination, such as the VAAF.

Implement policies that promote and demand equitable management resource distribution, such as funding quotas specifically allocated to ACCOs to level the playing field.

Facilitate two-way capacity building between government departments and ACCOs.

Unequal power and resources to mainstream organisations

The consultations raised the concern that unequal distribution of power and resources results in mainstream organisations being prioritised over ACCOs, perpetuating existing disparities in service provision in Victoria. In addition, government funding processes where there were not specific Aboriginal targets and funding, could put emphasis on partnerships with mainstream organisations, which ACCOs felt impacted unequal power and resources for them.

ACCOs felt that these disparities are influenced by biases, institutional racism, and a limited understanding of the crucial role of ACCOs. Existence of this bias can lead decision-makers to prioritise mainstream organisations due to familiarity and established norms, perpetuating systemic racism. This bias can also overshadow the expertise of ACCOs in delivering culturally appropriate services and strong community connections, which are essential for supporting Aboriginal communities.

Additionally, we heard that ACCOs, particularly smaller ACCOs, can face challenges due to their lack of resources in comparison to larger community service organisations. ACCOs felt the lack of progress by departments towards securing adequate funding for ACCOs posed significant barriers, along with the lack of non-competitive funding streams. ACCOs felt that well resourced organisations with strong policy and submission capabilities often secure funding currently, while smaller organisations with fewer resources may miss out. In particular, opportunities frequently come with tight application deadlines, and if an organisation lacks experienced submission writers and have less resources, they often miss out.

GOOD PRACTICE EXAMPLE OF TRANSFERRING FUNDS TO ABORIGINAL ORGANISATIONS:

At least 10 per cent of all family violence and sexual assault funding provided to Family Safety Victoria in the 2023-24 Budget was allocated to ACCOs, to ensure Aboriginal victim survivors and people using violence have access to culturally safe and appropriate support services.

ACCOs considered that this imbalance reinforces the necessity for departments to directly engage with ACCOs in partnerships and generally preferred this to consortia approaches.

During competitive grants processes, consultations heard that ACCOs often find themselves treated similarly to mainstream organisations without considerations for their more limited resources, cultural safety and power dynamics. This approach fails to address the inherent power imbalances where mainstream organisations retain greater control over resources and decision-making, undermining the autonomy and cultural competence of ACCOs.

As raised by ACCOs, unequal power and resources to mainstream organisations in practice this means:

ACCOs lack influence, funding, and resources compared to mainstream:

This means they often receive less funding and have less say in decision-making.

Power imbalances in partnerships:

When mainstream organisations partner with ACCOs, they hold more power and resources and there is no accountability when good partnering principles are not upheld or developed.

Insufficient clarity and transparency in the negotiation and implementation of partnership agreements,

leading to misunderstandings and potential exploitation of ACCOs by mainstream organisations.

Solutions raised:

Create independent assessment panels or mechanisms to ensure impartiality and accountability in decision making, while ensuring probity requirements are upheld.

Implement anti-racism policies and procedures within funding bodies and government departments to address biases in resource allocation and decision making processes.

ACCOs should have first rights to funding and targets relating to Aboriginal communities, any funding not to ACCOs should be short term and provide opportunities for ACCOs to provide services in the future.

Quotes from ACCO consultations:

“Say the ratio was one FTE to five cases. They gave an ACCO .5 of a position and expected 4 targets. So that was a blatant, blatant misuse of an Aboriginal agency by a mainstream provider.” – raised in the context of a sub-contracting agreement between an ACCO and a mainstream organisation

“We’re going through this (bid) process and then we just get into the mix with everybody else. That resolves nothing around this power and control and balance, which is a cultural safety issue.”

Inflexible government structures, systems and funding often misaligning with Aboriginal needs

ACCOs raised the issue of government structures and budget frameworks often not aligning with the cultural perspectives, needs, and Aboriginal ways of working with local communities. This disparity forces ACCOs to bridge the gap through 'translation' efforts. Departments are typically organised to separate services and funding streams, creating a bureaucratic setup that challenges ACCOs in navigating processes and accessing necessary resources. ACCOs reported that they frequently contend with short funding cycles (such as three years) and non recurrent funding disproportionately to mainstream organisations, which stakeholders argue are too brief and don't provide security and ability to plan long term to achieve meaningful change. These cycles also impose stringent reporting requirements and outcomes that are unrealistic to meet.

Quotes from ACCO consultations:

"Three years is too short and maintains the status quo. Five years allows for potential attrition and is more manageable."

"We deliver services on an individual basis, not an issue basis. Justice outcomes are linked to health, housing, and other outcomes."

GOOD PRACTICE EXAMPLE:

The Aboriginal Justice Caucus effectively navigated government inflexibility through resilient community partnerships and adaptive strategies.

In practical terms, we heard that ACCOs often act as intermediaries, interpreting community needs and expectations for government. They deliver culturally informed care that extends beyond specific funding agreements to comprehensively address community needs covering physical, emotional, and cultural needs. However, their ability to provide a full spectrum of services is constrained by limited resources.

ACCOs noted that longer funding periods are crucial as this offers the stability and flexibility to plan and sustain initiatives, and is essential for addressing complex community issues effectively.

As raised by ACCOs, inflexible government structures *in practice* this means:

Conflict with Aboriginal Knowledge and Practices:

Departmental structures rigidly adhere to Western frameworks, often disregarding cultural considerations and unique needs of local Aboriginal communities. This conflict limits ACCOs ability to provide culturally appropriate services that truly meet community needs.

Compartmentalisation within government departments:

Siloed functions within government departments pose significant challenges for ACCOs. This leads to departments channelling resources and managing processes in ways that do not support the holistic and integrated approaches that ACCOs employ. This compartmentalisation can lead to inefficiencies and gaps in service delivery.

Short-term funding commitments cause

uncertainty about future funding, exacerbate financial instability, and hinder long-term planning and stable workforce that are crucial for community development and wellbeing.

Solutions raised:

Implement integrated funding models that allow for flexible allocation of resources across government departments, aligning with Aboriginal community-led approaches. This could include multi-year grants or flexible funding pools for minimum of 5 years.

Facilitate cross-departmental collaboration and coordination to streamline funding and reporting processes and improve alignment with ACCOs that offer holistic services that don't fit within government silos.

Establish clear policy directives mandating the allocation of Aboriginal targets to ACCOs and proportionate funding to Aboriginal targets and agencies.

Lack of investment in evidence building within ACCO

We heard that ACCOs struggle due to inadequate funding for the essential infrastructure and support needed to demonstrate their organisations effectiveness. This lack of financial support makes it difficult for ACCOs to show how culturally informed practice benefits their communities. Consultations also highlighted a misconception that programs proven effective in general, will also benefit Aboriginal people. The effectiveness of self-determination in improving outcomes for Aboriginal people means that programs should be designed by Aboriginal people for Aboriginal people. This includes outcome measures that reflect what is important to Aboriginal people and address cultural determinants of health and wellbeing, which ACCOs said would ensure an Aboriginal evidence base is built through Aboriginal led evaluations. Additionally, limited resources and insufficient support hinders the ability of ACCOs to collect, manage, and analyse data effectively. This impacts their ability to make a timely, well supported submission for funding program evaluations.

Quotes from ACCO consultations:

"The thing is, we don't have a lot because nobody's ever resourced the collection management, analysis, storage of data for our sector."

"Current government policies like Wungurilwill Gapgapduir outline government commitment to building an aboriginal evidence base but government has not demonstrated this commitment in funding an Aboriginal Knowledge and practice Centre to build the capacity of ACCOs to generate, share, translate and application of Aboriginal evidence."

"What you're talking about is data sovereignty, ensuring that the measures are culturally safe and owned by the ACCOs."

GOOD PRACTICE EXAMPLE:

DFFH funding for the development of the **Cultural Practice Elements** led by VACCA in partnership with the Centre for Evidence and Implementation, which was funded through EIIIF. Further, DFFH amended the service agreement for VACCA to own intellectual property of the Cultural Practice Elements developed.

ACCOs further highlighted that they often face challenges with data sovereignty, as they lack control over their own data and must rely on government data systems, across various sectors, that are not designed for ACCOs or do not include culturally relevant information. This dependence complicates access to the timely and relevant information needed for decision-making processes. Aboriginal knowledge, including cultural knowledge, requires protocols to protect Indigenous Cultural and Intellectual Property that is often collected, used and then owned by government, rather than Aboriginal people and ACCOs who hold the knowledge.

As raised by ACCOs, lack of investment in evidence building *in practice* this means:

<p>Prioritisation of Western definitions of evidence standards impedes access to funding and exacerbates resource disparities and lack of Aboriginal evidence.</p>	<p>Lack of direct access: difficulty in obtaining and utilising essential data due to resource constraints and a lack of immediate access to government data management systems.</p>	<p>Hinders data sovereignty, i.e. ACCOs capacity to develop their own evidence base, collect, manage and analyse data effectively and ensure cultural safety in the process. ACCOs to have IP and ICIP in programs where they contribute to cultural and community knowledge.</p>	<p>Hinders the development of an Aboriginal-specific evidence base due to a lack of support and funding for evaluating existing programs and practice.</p>
---	---	--	---

Solutions raised:

<p>Provide targeted seed funding and technical assistance to build capacity within ACCOs for data management infrastructure, data collection, analysis, and reporting to meet evidence standards and build the Aboriginal evidence base.</p>	<p>Recognising Aboriginal expertise and ways of working with community and building in funding to be able to do effectively do that. This includes consideration of associated costs for cultural supervision, training, and additional time and resources often required, beyond 9-5.</p>	<p>Advocate for partnerships between ACCOs and departments, to improve data sovereignty, data access, analysis and reporting of data that is meaningful to the Aboriginal community.</p>
--	--	--

Rigorous requirements to access funding and reporting burden

ACCOs noted that the stringent requirements for funding and reporting arrangements impose significant challenges on ACCOs. For example, when ACCOs engage in budget bids for initiatives such as EIIIF, they often face demands from departments for detailed cost analysis. This analysis requires ACCOs to provide comprehensive breakdowns of project costs, including financial projections and return-on-investment assessments. This level of detail is crucial for government decision-making but can be resource-intensive for ACCOs, who may lack the financial expertise or capacity to compile such extensive documentation.

Comments from consultations highlight frustrations where ACCOs feel they provide substantial cultural knowledge in bids yet have little insight into how it is utilised internally by departments. ACCOs often find themselves working closely with government but feel there is limited transparency about when and how the information is used. ACCOs also highlighted the frustration of being asked for cultural input but seeing that the final products omit references to their cultural and community knowledge. This lack of visibility of how their cultural knowledge is utilised during budget processes leaves ACCOs uncertain

about the impact of their input. ACCOs further reported facing instances where they are involved in bid discussions but do not receive comprehensive feedback or clarity on the final bid outcome. They felt that the lack of transparency hinders good partnering. ACCOs felt that it was often the case that appropriate support or funding was not provided to allow them to meaningfully engage in these processes.

Another key barrier identified was that reporting is largely concerned with departmental outcomes rather than outcomes that are meaningful to ACCOs or their communities. ACCOs commented that much time is wasted without adding to the knowledge of what meaningful outcomes should be considered in program design.

In addition, ACCOs highlighted that managing reporting obligations during implementation not only consumes valuable time and effort but also detracts from ACCOs core mission of delivering holistic care that meets diverse community needs. Furthermore, the complexity of these requirements can create barriers for smaller ACCOs, limiting their ability to compete effectively in bid processes and secure necessary funding for community projects.

Quotes from ACCO consultations:

"We've only really engaged with [EIIIF] through working with government who won't show us much."

"Mainstream organisations often have fewer reporting requirements in comparison to ACCOs to access the same funding streams. ACCOs are required to submit comprehensive data with the added culturally relevant information and unrealistic KPI's in comparison to mainstream who are often not held accountable for lack of access or no access."

"Whether it's social, return on investment or a cost benefit analysis, you need to engage an economist."

As raised by ACCOs, rigorous requirements to access funding and reporting burden in practice this means:

<p>Lack of visibility and transparency into how cultural knowledge is utilised in budget and decision-making processes. Despite providing substantial cultural insights, ACCOs are excluded from understanding how their input is incorporated into proposals.</p>	<p>Skill requirements for cost analysis: EIFF bids can automatically exclude ACCOs given their inability to comply with stringent documentation and evidence requirements.</p>	<p>Detailed Reporting: Government departments often require ACCOs to provide extensive and detailed reports, including complex financial analyses and projections, which can be resource-intensive for ACCOs. These often don't capture outcomes meaningful to Aboriginal communities.</p>
---	---	---

Solutions raised:

<p>Establish a separate governance process specifically for funding allocation related to projects impacting Aboriginal communities that recognise the expertise and leadership of ACCOs and reducing the bureaucratic burden associated with justifying funding requests.</p>	<p>Revise processes to enable Aboriginal led identification of outcomes and measures that include cultural determinants of health and wellbeing.</p>	<p>Provide information to ACCOs on development of financial costings and simplify these requirements.</p>
--	--	---

“One of (bid) which was an eve on the day it was going in, we were allowed to talk through it, but we weren't able to have it, and then sometimes it's been described back to us as our bid, but we still don't have it.”

“...feel like I just gave you 75 per cent of my Cultural knowledge sitting in that document and what he's gonna do with it now because we don't get to see and I think that that is really important how they use our information to brief up and to go through that bidding process internally and what that looks like.”

Lack of education around cultural safety and the role of ACCOs

Another key theme from consultations was that departments often lack awareness and recognition of cultural safety principles and the pivotal role of ACCOs. The consultation revealed that ACCOs invest significant effort in educating departments about these issues, and re-voice and re-share how to implement self-determination in program designs. This reflected frustrations about the resources used which are usually not funded. There was a clear sentiment in consultations that government should prioritise policies that support ACCOs roles and contributions, particularly in fulfilling commitments to Reconciliation Action Plans or departments' own cultural safety frameworks or initiatives.

Quotes from ACCO consultations:

"Imagine if we didn't have to do all of this, and we could just do our jobs."

"There should be a policy platform that kind of speaks to that. If there's a commitment to the [Reconciliation Action Plan] then it is a responsibility of government."

"It's like 80% of my time and energy is bringing people along this journey of understanding and awareness."

As raised by ACCOs, lack of education around cultural safety and the role of ACCOs in practice this means:

<p>A systemic failure to embed Aboriginal perspectives and priorities within government processes, leading to a continued reliance on outdated and inefficient approaches to funding allocation.</p>	<p>Perpetuation of systemic racism and inadequate culturally appropriate service delivery.</p>	<p>Limited collaboration and partnership: Insufficient understanding of ACCOs roles and cultural safety can hinder effective collaboration and partnership between departments and ACCOs. This lack of collaboration can lead to missed opportunities for leveraging ACCOs expertise in policy development and service delivery.</p>	<p>Impact on policy effectiveness: Without adequate education on cultural safety, government policies may not effectively address the local needs and priorities of Aboriginal communities. This can result in policies that are less impactful or fail to achieve desired outcomes.</p>
---	---	---	---

Solutions raised:

<p>Implement mandatory cultural competency and cultural safety training programs to enhance understanding of Aboriginal perspectives and needs within departments and mainstream organisations in how to work with Aboriginal people and ACCOs.</p>	<p>Encourage two-way capacity building between departments and ACCOs.</p>	<p>Development of comprehensive guidance and principles for collaboration, outlining expectations and responsibilities for both mainstream organisations and ACCOs in service delivery.</p>
---	---	---

Lack of accountability from department to follow intent of policies and initiatives

ACCOs highlighted that where there is a lack of accountability within departments, the use of cultural determinants to measure culturally appropriate outcomes can be often neglected, and the implementation of self-determination initiatives fail to be effectively monitored and evaluated.

Examples shared in the consultations suggested that this could result in funding that is intended for the Aboriginal community bypassing ACCOs and being awarded to mainstream services, therefore also bypassing Aboriginal community members. In some instances, ACCOs reported that funding ended up with mainstream organisations for capacity building and infrastructure. As a result, ACCOs suggested that departments not being held accountable for funding decisions leads to mismanagement and inefficiency and contradicts government and department self-determination policies.

Quotes from ACCO consultations:

"There are a lot of really good policies in Government, but it falls down in implementation"

[For an EIIIF funded program] "the funding document stated ACCOs could decide on measurement tools, however in implementation we had to advocate strongly for this as there was a lot of pressure to use tools being used by mainstream providers... and what [department] wanted used consistently for the evaluation even though we had assessed some of these were not culturally appropriate".

As raised by ACCOs, lack of accountability from the department *in practice* this means:

Inadequate monitoring and evaluation: Insufficient frameworks and oversight mechanisms within departments lead to a lack of accountability in tracking the implementation and effectiveness of self-determination frameworks and initiatives.

Absence of explicit cultural determinants: Departments frequently lack clear directives or frameworks that incorporate cultural determinants in measuring outcomes, resulting in funding decisions that may not align with Aboriginal community priorities.

Disconnect between policy and implementation: While there was a push for outcomes-based reporting and evidence-informed practices, there was a disconnect between the policy intent set by the department and the operational realities faced by frontline agencies.

Solutions raised:

Establish mechanisms for monitoring and evaluation to track the implementation of cultural safety practices and outcomes, as well as departments' adherence to commitments to self-determination and community control. This could include feedback loops involving local ACCOs to ensure accountability and effectiveness, as well as regular audits and evaluations of funding processes to identify and address instances of systemic bias or discrimination against ACCOs.

Using cultural determinants to measure outcomes and ensure that reporting requirements align with community needs.