Embedding cultural safety through the Early Intervention Investment Framework (EIIF)

The EIIF Cultural Safety Framework

VICTORIA State Government | Treasury and Finance

Acknowledgement of Country

The Victorian Department of Treasury and Finance acknowledges that Aboriginal and Torres Strait Islander peoples are the First Peoples and Traditional Custodians of Australia, and the oldest continuing culture in human history. We proudly acknowledge the Aboriginal communities within Victoria and recognise the value and ongoing contribution of Aboriginal people and communities to Victorian life. We pay our respect to Elders past and present and emerging.

The Government acknowledges the invaluable contributions of generations that have come before us, who have fought tirelessly for the rights of their people and communities towards self-determination. We reflect on the continuing impact of government policies and practices and recognise our responsibility to work alongside Aboriginal and Torres Strait Islander peoples towards improved cultural, social and economic outcomes through the Early Intervention and Investment Framework.

We also acknowledge the work and contributions of the Victorian Aboriginal Child and Community Agency (VACCA), as well as other Aboriginal Community Controlled Organisations (ACCOs) and First Peoples in developing this Framework.

Artwork Acknowledgement

Dixon Patten Jnr
Yorta Yorta, Gunnai, Gunditjmara
and Dhudhuroa of Bayila Creative

Art narrative

The artwork represents the Department of Treasury and Finance's commitment to Cultural Safety, Accountability, Respect and Collaboration.

The various pathways depict our connection to one another and represents the Department of Treasury and Finance's commitment to ensuring it promotes cultural safety and is an inclusive environment that is respectful and considerate of First Peoples.

The central circle represents the Department of Treasury and Finance and the outer circles represent the diverse communities across the State of Victoria. The hands depict accountability and the feet represent being guided by Aboriginal cultural principles.

Language statement and Glossary

We acknowledge that language is powerful and have sought to be respectful in the way we use it. Language is important and can change over time, and words can have different meanings for different people.

We acknowledge the diversity among Aboriginal and Torres Strait Islander peoples and communities, including the varied histories, political dynamics, social contexts, and cultural practices. We recognise that some individuals will prefer to use specific terms to reflect their tribe or clan group, for example, some Aboriginal people from Victoria may prefer 'Koorie' or 'Koori'. Unless otherwise stated, we have used the term 'Aboriginal' or 'First Peoples' throughout this document to include all people of Aboriginal and/or Torres Strait Islander descent who live in Victoria.

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Message from the Secretary, DTF

I am proud to present the *Embedding cultural safety through the Early Intervention Investment Framework (EIIF) – The EIIF Cultural Safety Framework.*

In doing so, I recognise the genuine partnership between the Department of Treasury and Finance (DTF) and the Victorian Aboriginal Child and Community Agency (VACCA) in developing this Framework, which aims to improve outcomes for First Peoples.

I also recognise the many Aboriginal Community Controlled Organisations (ACCOs) and government departments who provided invaluable feedback and input. Those conversations will continue as the EIIF Cultural Safety Framework is implemented and embedded.

In creating this Framework, staff at DTF have listened and sought to meaningfully reflect the insights and experiences of ACCOs, and have learned a great deal about how to remove barriers and improve engagement through the EIIF budget cycle.

While the EIIF Cultural Safety Framework outlines actions for line departments to consider in developing and implementing new EIIF initiatives, it also has broader lessons about how DTF can work more effectively with First Peoples to better enable self-determination.

DTF has fewer direct service delivery and regulatory responsibilities than most other government departments, which means that we don't have the same level of direct relationships with Aboriginal communities or organisations that line departments do. Yet we play a role in shaping many of the underlying policies that affect the lives of First Peoples' including through initiating and providing advice through the budget as well as in providing advice on whole of government resource allocation, funding and policy decisions, which means it's critical that we do more to incorporate First Peoples' perspectives in our work.

The process of developing the EIIF Cultural Safety Framework has been a critical step in establishing relationships between DTF and the ACCO sector, and we will nurture those relationships and continue to build on them.

I am confident that the EIIF Cultural Safety Framework will also inform broader service design and the way we approach other budget matters in relation to First Peoples.

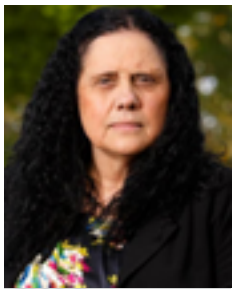
We recognise that this is just the beginning of the process. We commit to continuing to work with department stakeholders, Aboriginal community members and ACCOs as we grow our understanding about embedding cultural safety into EIIF.

If you wish to speak about opportunities through the EIIF Cultural Safety Framework, please contact us at earlyintervention@dtf.vic.gov.au.

I am excited to see how our collective actions can better support self-determination in Victoria.

Chris Barrett
Secretary, Department of Treasury and Finance

Message from the CEO, VACCA



As one of many Aboriginal Community Controlled Organisations (ACCOs) in Victoria, we are deeply committed to the well-being of Aboriginal communities.

As First Peoples, we understand the intrinsic value of culture and the impacts it has on health, wellbeing and safety, which are holistic and encompass cultural, emotional, spiritual, and physical environments. It has long been recognised that initiatives which embed First Peoples and cultures into their design and delivery achieve better outcomes for Aboriginal and Torres Strait Islander communities.

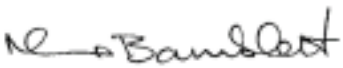
The EIIF Cultural Safety Framework recognises the relationship between cultural practice and outcomes for First Peoples, emphasising the vital role of Aboriginal organisations which were established to work in this integrated way. Aboriginal organisations are integral at every stage of the process, from identifying needs to program design, implementation, and evaluation. The active involvement of the Department of Treasury and Finance (DTF) and other relevant departments ensures the Framework aligns with Priority Reform Three of the National Agreement on Closing the Gap through the process of shared decision making whereby all levels of governments demonstrated their capacity to work collaboratively with the Aboriginal sector to create a system that is both equitable and responsive to our needs. This is us working together in a genuine process of self-determination.

As we collaborate to expand these efforts, it is crucial to embed cultural safety within the Early Intervention Investment Framework, ensuring that the voices and perspectives of Aboriginal communities are central to this process to drive meaningful, impactful change. This approach addresses past practices that have devalued First Peoples cultures and overlooked cultural safety in economic evidence. Initiatives focused on improving outcomes for First Peoples and communities have rarely been assessed for their cost/benefit or return on investment from an Aboriginal perspective. This gap is particularly significant given the decades of intergenerational trauma experienced within our Communities.

This Framework offers a valuable opportunity to improve current practice by establishing genuine partnerships, developing additional guidance, and learning from what has worked. There is a growing base of evidence on the contribution of First Peoples cultures to the achievement of broader outcomes and this Framework adds to that evidence base.

To deepen our understanding of the true value of cultural practice and outcomes, it is essential to maintain a focus on research and evaluating of this Framework's impact. Continuous learning from both successes and challenges will be crucial for guiding the development of future initiatives and informing decision making.

We are grateful to DTF's Early Intervention and Reform team for their genuine partnership on this Framework. Their commitment to lift the capability of DTF, government departments, mainstream organisations and ACCOs to consider and incorporate the value of First Peoples cultures into funding decisions is a critical step towards better outcomes for our Aboriginal communities.



Aunty Muriel Bamblett
CEO, Victorian Aboriginal Child and Community Agency

EIIF Cultural Safety Framework – 'Framework on a page'

The Early Intervention Investment Framework (EIIF) Cultural Safety Framework aims to improve outcomes for First Peoples by listening and learning from the experiences of First Peoples and implementing actions to better support cultural safety and self-determination when developing EIIF budget proposals.

The Department of Treasury and Finance (DTF) partnered with the Victorian Aboriginal Child and Community Agency to develop the EIIF Cultural Safety Framework, consulting with a range of Aboriginal Community Controlled Organisations (ACCOs) and Victorian Government departments engaged in EIIF.

Consultation with ACCOs raised eight key barriers for reform:

- Lack of Aboriginal-led decision-making within budget processes
- Systemic failure to implement existing government commitments to self-determination
- Unequal power and resources to mainstream organisations
- Inflexible government structures, systems and funding often misaligning with Aboriginal needs
- Lack of investment in evidence building within ACCOs
- Rigorous requirements to access funding and reporting burden
- Lack of education around cultural safety and the role of ACCOs
- Lack of accountability from departments to follow intent of policies and initiatives

This consultation informed the EIIF Cultural Safety Framework domains and actions. These are important for departments when developing EIIF budget proposals, as DTF will look for evidence of these domains in its consideration of EIIF business cases.

Domain 1: Working in partnership

Departments should consider:

- Fostering engagement through facilitating and allowing sufficient time for capacity building
- Sharing information and encouraging transparency by being clear on how information is being used, managing expectations throughout the budget process, and ensuring feedback loops
- Being respectful of time commitments and ensuring requests of ACCOs are appropriate by attending cultural safety training and/or engaging with vast pre-existing resource
- Undertaking due-diligence on business cases where ACCOs are included as part of a consortia.

When assessing EIIF business cases, DTF will look for evidence that, or the extent to which, relevant proposals have been designed through genuine partnering with First Peoples. DTF may request additional information to understand the extent of consultation.

Domain 2: Recognising the Aboriginal evidence base

Departments should consider:

- Negotiating and co-designing meaningful EIIF outcome measures with First Peoples
- Planning enough time for community-led consultation and co-design
- Considering how cultural determinants of health and wellbeing can be incorporated and measured
- Providing any additional information in the business case that speak to a holistic view of a program's benefits
- Discussing early with the EIIF team about options for evidencing a program's benefits that supplement the EIIF's quantification requirements.

When assessing EIIF business cases, DTF will look for evidence that outcome measures have been co-designed with First Peoples, or a clear consultation plan that sets out how community will be engaged in developing outcome measures.

Domain 3: Supporting effective implementation

Departments should consider:

- Seeking to provide ACCOs with longer term funding agreements, if budget funding allows for it
- Exploring funding models such as flexible funding or outcomes-based contracts as alternatives to standard service agreements
- Ensuring resourcing requests for ACCOs recognise the scope of their work, including cultural load and consultation government seeks their engagement in
- Requesting resources as part of budget bids to enable evaluation and/or data collection
- Investing in Aboriginal-led approaches to data, monitoring and evaluation.

When assessing EIIF business cases, DTF will look for proposals that identify service provider needs, particularly ACCOs, for collecting data during implementation and propose adequate resourcing to do this, as well as any commitments to building Aboriginal-led data and evaluation.

How DTF can help with EIIF proposals

- ✔ Facilitate collaboration across departments and with the social services and ACCO sectors
- ✔ Provide advice on evaluations to help better inform an evidence base
- ✔ Work with departments and ACCOs to develop outcome measures and avoided cost estimates
- ✔ Support linked data analysis
- ✔ Provide advice on outcomes-based funding arrangements
- ✔ Explore resource and skill sharing between departments and the social services and ACCO sectors
- ✔ With departments support, continue to volunteer economic expertise as part of development of individual budget bids.

For further information, please contact earlyintervention@dtf.vic.gov.au

Next steps

DTF will develop additional resources and undertake enabling activities to support implementation of the EIIF Cultural Safety Framework.

To measure progress, DTF will monitor activities, including through review of EIIF business cases submitted by departments, to annually measure and trial public reporting of high-level progress against key indicators.

DTF is also considering the findings and insights from the consultations that have application beyond EIIF and will explore how they can help inform work around advancing self-determination:

- in budget processes and decision-making
- by improving cultural safety and Aboriginal employment and inclusion in DTF
- through greater partnerships and engagement with First Peoples
- by improving economic outcomes for First Peoples.

Introduction

Purpose

In the *2023-24 Budget* the Government announced that the Department of Treasury and Finance (DTF) would develop a Cultural Safety Framework to underpin the Early Intervention Investment Framework (EIIF).

Stakeholder consultation identified the need for cultural safety to be considered and recognised within the EIIF as fundamental to delivering effective and inclusive services.

The two key objectives of the *Embedding cultural safety through the Early Intervention Investment Framework (EIIF) – The EIIF Cultural Safety Framework* (herein, the 'EIIF Cultural Safety Framework') are to:

1. **Listen and learn** from the experiences of First Peoples on how to embed cultural safety in the EIIF
2. **Identify and implement** actions that can better support cultural safety and self-determination within the EIIF, noting key roles:
   - DTF, who is responsible for administering the EIIF and providing advice to the Government on EIIF budget proposals
   - Line departments, who bring forward budget proposals through the EIIF

By doing this, the EIIF Cultural Safety Framework is aiming to help improve outcomes for First Peoples, including through supporting culturally safe partnerships, improving the design and implementation of EIIF programs, and contributing to advancing self-determination.

Alongside improving culturally safe processes, the EIIF Cultural Safety Framework also emphasises the need to build the capacity of individuals involved. This is vital for ensuring that those developing and delivering EIIF initiatives are culturally informed and capable, helping to achieve positive outcomes with Aboriginal communities in Victoria.

It is worth noting that the EIIF Cultural Safety Framework aims to support the development of EIIF budget proposals, as well as the implementation of initiatives funded through the EIIF. **It does not determine funding decisions made through Budget which is a responsibility for the elected Government as decision makers, rather than DTF or other public service departments.**

Developing the EIIF Cultural Safety Framework has been, and will continue to be, a learning journey. Although we have focused on actions for the EIIF specifically, many of the learnings and what we heard from Aboriginal Community Controlled Organisations (ACCOs) and departments engaged in this process, are not exclusive to the EIIF. DTF are committed to continuing to work with department stakeholders, Aboriginal community members and ACCOs to share learnings and discuss how we can further embed the intentions of this work.

Background

DTF and the Victorian Aboriginal Child and Community Agency (VACCA) worked in partnership for over 14 months to scope and develop the EIIF Cultural Safety Framework, consulting a range of ACCOs and Victorian Government departments engaged in EIIF.

Recognising the expertise and skills VACCA and DTF each brought to the table helped to build trust through this partnership. Utilisation of these combined perspectives has contributed to the integrity of the EIIF Cultural Safety Framework through genuine collaboration built on equally shared resources, workload, and two-way learning.

As the EIIF approaches its fifth year of implementation in the Victorian budget process, it is critical to consider how DTF and departments can better reflect Aboriginal ways of knowing, being and doing in relevant EIIF proposals and programs. If successful, this will encourage meaningful outcomes for First Peoples, with cultural safety and self-determination being reflected in increasingly more budget proposals.

Our intention is that the learnings and information captured in this process can support the broader government approaches, actions and frameworks designed to support First Peoples'.

What is cultural safety?

Cultural safety is the positive recognition and celebration of cultures. It is more than the absence of racism or discrimination, and more than cultural awareness and sensitivity. A culturally safe environment does not ignore, challenge, or deny cultural identity. A culturally safe environment is about shared respect, knowledge and understanding. It creates spaces where people feel safe to be themselves. In a culturally safe environment, Aboriginal children, families and communities define what is comfortable and safe. In such environments, government, departments, and mainstream organisations should seek guidance across policy development, program design, implementation, and other facets, to ensure they consider the impact of their own culture on all aspects of work.

To achieve cultural safety, government bodies, departments, and mainstream organisations must incorporate continual learning through building cultural capacity and competency into their policies, program design, and implementation. This means considering how their own culture and practices affect their work and seeking guidance from Aboriginal communities to ensure their services and interactions are genuinely inclusive and respectful.

When cultural safety is prioritised, the rights of Aboriginal people are upheld to:

- identify as Aboriginal without fear of retribution or questioning
- have an education that strengthens culture and identity
- maintain connection to land and Country
- maintain strong kinship ties and social obligations
- be taught culture by their Elders
- receive information in a culturally sensitive, relevant and accessible manner
- have Aboriginal organisations provide services to their community
- be involved in services that are culturally respectful.

The Early Intervention Investment Framework (EIIF)

Early intervention can improve outcomes for service users and reduce pressure on more intensive (acute) downstream service systems.

The Victorian Government introduced the EIIF in the *2021-22 Budget*, seeking to grow investment in evidence based early intervention initiatives by providing a dedicated funding pathway within Victoria's annual state budget process.

For a proposed initiative to be considered under the EIIF, new budget business cases are required to provide evidence of an initiative's anticipated impact through:

- Outcome measures: The quantified impacts on the lives of service users and their families, the broader community, and the service system.
- Avoided costs: The monetised value that an early intervention initiative creates through reducing the future need for Victorian Government acute services.

In addition, DTF also seeks to estimate economic benefits for each initiative i.e. direct monetisable impacts outside of Victorian government service use reduction, such as higher workforce participation and lower welfare payments.

The EIIF provides a basis for trialling innovative early intervention initiatives, ensuring that evidence on the effectiveness of an initiative is collected and reported. This is done through the EIIF Annual Outcomes Report, which enables the Government to monitor the impact of their investment in individual EIIF initiatives. This reporting is central to building the evidence base and informing future government decision making.

The EIIF has worked to encourage continuous improvement of both the EIIF itself and the way that government and organisations can work together to improve the evidence base for potential EIIF initiatives. Examples of this include:

- **The Empowerment Fund:** A $5 million fund provided to social services organisations to help support data and evaluation capability and processes, and sharing of evaluation insights.
- **Co-design and the Early Intervention Investment Framework**: This guidance paper details how greater collaboration between parties can better inform policy ideas and future EIIF business cases.
- **Client pathways reports:** Reports inform EIIF proposals by providing public data insights on the use of government services by people who are at risk of or experiencing social disadvantage.

For more information on the EIIF, please visit the EIIF website.

Structure of the EIIF Cultural Safety Framework

The EIIF Cultural Safety Framework covers the following sections:

- **Current context:** Provides a high-level overview of Victoria's current commitments to self-determination and other priority reforms, outlining where the EIIF Cultural Safety Framework fits within this broader work.
- **What we heard:** Summarises feedback from VACCA's consultations with ACCOs, highlighting eight key barriers for reform. While these findings underpin the EIIF Cultural Safety Framework, they are also applicable to a much broader audience. Further details on the process and findings from these consultations are detailed in 'Appendix 1 – What we heard'.
- **Implementing the EIIF Cultural Safety Framework:** Outlines the actions for departments to consider when designing and delivering EIIF budget proposals that primarily impact First Peoples. These are presented under three overarching domains that align with key components of the EIIF budget process. The three domains are:
  - Working in partnership
  - Recognising the Aboriginal evidence base
  - Supporting effective implementation
- **Next steps:** Outlines the measures of success for the EIIF Cultural Safety Framework, changes DTF will be making, and other enabling initiatives that will be explored as a result of this process.
- **Appendix 1 – What we heard:** Provides further information on the consultations between VACCA and ACCOs that informed the earlier 'What we heard' section, including the consultation process and more detail on the barriers and solutions raised by ACCOs.
- **Appendix 2 – Summary of actions for departments to consider across the budget cycle:** Provides a summary of actions for departments to consider to support the implementation of the EIIF Cultural Safety Framework at different phases of the budget cycle.

Current Context

Current commitments

DTF recognises the importance of Aboriginal self-determination as a key approach that has produced effective and sustainable improvement in outcomes for First Peoples.[1]

We acknowledge that First Peoples have always maintained strong community governance through lore, cultural practices and decision-making structures. This has driven Aboriginal communities and ACCOs to fight for the right to make decisions on matters that affect their lives and communities.

The Victorian Government is on the path to Truth and Treaty, and has a commitment to advancing Aboriginal self-determination, including under the Victorian Aboriginal Affairs Framework (VAAF) which has been extended until June 2025, as well as a departmental commitment to embedding self-determination across all portfolios and functions of government through the Self-Determination Reform Framework (SDRF).

In response to these commitments, DTF developed the Advancing Self-Determination in DTF plan which sets out initial proposed actions including self-determination reforms.

As part of his witness statement, the Treasurer recently reiterated his commitment to progressing initiatives for self-determination and acknowledged more can be done to incorporate First Peoples' views and priorities.

"... my department and I are committed to progressing initiatives to bring self-determination principles into the budget decision-making process. I acknowledge that more can be done to incorporate First Peoples' views and priorities and that budget decision making is about more than just funding new initiatives. One of the opportunities to do this is through DTF's Early Intervention Investment Framework (EIIF)."

Tim Pallas, Treasurer, Yoorrook second witness statement

The EIIF Cultural Safety Framework leverages the VAAF and supports the above commitments to self-determination, including by promoting cultural safety and aiming to reflect Aboriginal perspectives and priorities through the EIIF.

We recognise cultural safety as being foundational to self-determination because it ensures that First Peoples can exercise their rights and make decisions in environments that respect and validate their cultural identities and practices.

We also acknowledge the many agreements, strategies, policies, and frameworks that exist within departments, and between departments and Aboriginal community members and organisations. Departments should consider how the EIIF Cultural Safety Framework fits within the context and objectives of other work and existing commitments within the relevant portfolio/s.

[1] Department of Treasury and Finance, (2020). *Advancing self-determination in DTF*, p.4.

The importance of self-determination

The VAAF recognises that to achieve positive outcomes, the way governments work with Aboriginal people must fundamentally change.

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) expresses the right to self-determination as the right of Indigenous peoples to freely determine their political status and pursue their economic, social, and cultural development.

The UNDRIP was drafted by Indigenous peoples around the world including Aboriginal and Torres Strait Islander peoples and seeks that governments uphold Indigenous peoples' right to self-determination. It also sets out a universal framework of minimum standards for the survival, dignity and well-being of Indigenous peoples globally, and elaborates on how existing human rights standards apply to Indigenous peoples.

The Victorian Government is committed to advancing and enabling self-determination, which underpins the SDRF and VAAF[2] because:

- **It works.** Aboriginal people hold the knowledge and expertise about what is best for themselves, their families, and their local communities. Local and international evidence shows us that self-determination is the key approach that has produced effective and sustainable outcomes for Indigenous people.
- **It is what community wants.** Aboriginal people have long and consistently called for self-determination as the key enabler for Aboriginal people, families and communities to thrive.
- **It is a human right.** Australia is a signatory to international law instruments, including the UNDRIP, that affirm the right to self-determination for Indigenous peoples.

The EIIF has a strong focus on 'what works' and has recognised from the beginning that involving those delivering services in the design of proposals can help to maximise the quality of EIIF proposals through their understanding of the needs of the community and service user.

As such, a core part of the EIIF has been to encourage genuine partnerships between DTF, departments and the sector, and the expertise each brings.

We recognise advancing self-determination aligns with and helps to achieve the objectives of the EIIF.

Self-determination guiding principles

The VAAF sets out 11 guiding principles to underpin all government action to progress self-determination. They set the minimum standard for all existing and future work with First Peoples, providing a 'common language' of what self-determination looks like in practice. These guiding principles are:

- Human rights
- Cultural integrity
- Commitment
- Aboriginal expertise
- Partnership
- Investment
- Decision-making
- Empowerment
- Cultural safety
- Equity
- Accountability

[2] State of Victoria, (2018). *Victorian Aboriginal Affairs Framework 2018-2023*, p. 22.

Progressing implementation of Closing the Gap

The EIIF Cultural Safety Framework will assist with progressing Victoria's commitments under the National Agreement on Closing the Gap (National Agreement) and Victoria's Closing the Gap Implementation Plan 2021-2025 (Implementation Plan). The Implementation Plan sets out a whole of government strategy of how new and existing actions and programs align with commitments against the National Agreement, including four Priority Reforms and 19 targets, set across 17 socio-economic outcomes. The four Priority Reforms include:

- Priority Reform One: Formal partnerships and shared decision-making
- Priority Reform Two: Building the community-controlled sector
- Priority Reform Three: Transforming government organisations
- Priority Reform Four: Shared access to data and information at a regional level.

The EIIF Cultural Safety Framework aligns with Priority Reform Three by guiding government departments to:

- be culturally safe and responsive to the needs of First Peoples
- transform the way they engage with First Peoples organisations to develop service design and delivery and provide contracts and funding.

The EIIF Cultural Safety Framework supports this commitment and DTF's work to improve outcomes for First Peoples. It also supports the other Priority Reforms through its aim to improve budget processes for ACCOs', and by highlighting the need for proposals to be co-designed or developed in partnership with ACCOs and the importance of First Peoples' knowledge or data as an evidence base.

The EIIF Cultural Safety Framework progresses recommendations in the Productivity Commission's Review of the National Agreement (Review) which advocates for embedding greater self-determination when engaging with First Peoples in budget processes regarding the design and delivery of services that affect them. Recommended action 3.2 *Review and update funding and contracting rules so that they explicitly incorporate accountability for funders to abide by the Priority Reforms in commissioning processes* calls for better recognition that community control is an act of self-determination and that the relevant ACCOs should be engaged in funding decisions and budget processes.

The Victorian Government is in the process of developing a new Implementation Plan in collaboration with First Peoples to be in place by June 2025. The new plan will include an update on ongoing actions, challenges and opportunities for improvement and detail the next stages of Victorian Government action to progress commitments under the National Agreement. The new Implementation Plan presents an opportunity to embed the EIIF Cultural Safety Framework as a whole-of-government priority action to promote self-determination and cultural safety practices when engaging with First Peoples organisations and funding services that impact First Peoples.

How does the EIIF Cultural Safety Framework relate to Treaty?

The Victorian Government is committed to working in partnership with the First Peoples' Assembly of Victoria to progress a well-supported, well-planned and transparent Treaty process. The Treaty process is about embedding the Government's commitment to self-determination and delivering better outcomes for First Peoples. As the State prepares for the formal commencement of Treaty negotiations in Victoria, it is not the role of the State to pre-suppose outcomes of the Treaty process. The EIIF Cultural Safety Framework does not limit or anticipate the impact and role that future Treaty or Treaties may have on the Victorian Government's efforts to enable self-determination.

It is important that key policy reform initiatives continue alongside Treaty preparations. DTF is committed to progressing the significant and important work of ensuring cultural safety in our systems and processes, and enabling self-determination in partnership with First Peoples. This work is being prioritised alongside the Treaty process with the First Peoples' Assembly of Victoria. The priorities and actions in the EIIF Cultural Safety Framework will be reviewed regularly and will respond to the actions and changes required in the future to facilitate outcomes of Treaty or Treaties.

What we heard

The EIIF Cultural Safety Framework was shaped through consultations led by VACCA, with ACCOs across key service areas that have been previously funded through and aligned to the EIIF.

The findings that emerged from the consultation highlighted eight key barriers that form the basis for reform. These barriers underpin all of the domains and actions detailed in the following sections and are foundational to the EIIF Cultural Safety Framework.

While the EIIF was the focus of the consultations, many of the learnings and findings had broader applicability. As such, DTF will also use these to support broader approaches and frameworks and promote the voice and experiences of these ACCOs and First Peoples. We also encourage others to review, digest, and engage in conversations about which of these barriers are relevant within their own contexts and prioritise how they may address these.

Table 1 summarises each of the barriers and highlights how they have informed the domains in the EIIF Cultural Safety Framework. '**Appendix 1 – What we heard**' provides further detail on the eight barriers for reform, as well as outlining the consultation process, presenting proposed solutions from ACCOs, and includes some examples of good practice that currently exist in the Victorian context.

Table 1: Summary of barriers for reform and how they map to EIIF Cultural Safety Framework domains

Barrier for reform	Short description	Relevant domain in EIIF Cultural Safety Framework	Broader relevance beyond EIIF
Lack of Aboriginal-led decision-making within budget processes	ACCOs noted that excluding Aboriginal input in budget decisions limits culturally appropriate service delivery and self-determination.	• Working in partnership	✔
Systemic failure to implement existing government commitments to self-determination	ACCOs raised that departments often fall short in fully executing their commitments to Aboriginal self-determination, resulting in ACCOs having to repeatedly explain the historical context and principles of self-determination, and advocate for appropriate funding.	• Working in partnership	✔
Unequal power and resources to mainstream organisations	ACCOs raised that mainstream organisations are often prioritised over ACCOs, leading to disparities in service provision and funding, which is influenced by biases and a lack of understanding of ACCOs' roles. This imbalance highlights the need for more meaningful engagement and support for ACCOs.	• Working in partnership	✔
Inflexible government structures, systems and funding often misaligning with Aboriginal needs	ACCOs raised that government systems and funding often misalign with Aboriginal needs, forcing ACCOs to bridge gaps through unfunded translation efforts, while managing burdensome processes, short-term funding, and heavy reporting that limit their effectiveness.	• Supporting effective implementation	✔
Lack of investment in evidence building within ACCOs	ACCOs raised that government funding inadequately supports ACCOs in building evidence and managing data, which is crucial for effective decision-making and protecting cultural knowledge.	• Working in partnership • Recognising the Aboriginal evidence base • Supporting effective implementation	✔
Rigorous requirements to access funding and reporting burden	ACCOs raised that departments impose demanding funding and reporting requirements on ACCOs, whose limited resources make it challenging to meet these demands. This strain is compounded by frustration over lack of transparency in how cultural input is utilised and a lack of outcomes that are meaningful for ACCOs or their communities.	• Recognising the Aboriginal evidence base • Supporting effective implementation	✔
Lack of education around cultural safety and the role of ACCOs	ACCOs raised that departments frequently overlook cultural safety and the crucial role of ACCOs, requiring significant, often unfunded, effort from ACCOs to educate and advocate.	• Working in partnership	✔
Lack of accountability from departments to follow intent of policies and initiatives	ACCOs noted that when departments lack accountability for delivering in line with stated policies, it can lead to ineffective program delivery and misallocation of funds meant for ACCOs.	• Recognising the Aboriginal evidence base • Supporting effective implementation	✔

Implementing the EIIF Cultural Safety Framework

Based on what we heard from ACCOs (summarised in the earlier section and detailed in Appendix 1), and feedback from departments, DTF has considered and suggested improvements that can be made to support cultural safety, and better enable self-determination through the EIIF budget process.

These fall within three domains that align to the key components of the EIIF:

Under each domain, we've provided a high-level summary as well as details on the below:

- What it is and why it's important, and how it relates to what we heard from ACCOs
- What actions departments should consider implementing
- Examples and/or case studies of how this can be done
- What DTF will be looking for during budget deliberations.

The identified actions for departments to consider aim to help improve outcomes for First Peoples through EIIF initiatives. However, this is not an exhaustive list. Departments should consider the EIIF Cultural Safety Framework alongside what they may be hearing from community and ACCOs directly, and department specific cultural safety frameworks, policies, and guidance documents.

Successfully implementing these actions also relies on and encourages the capability uplift of staff across government departments. DTF acknowledges that staff capability varies across and within departments, and that for some departments, actions in the EIIF Cultural Safety Framework may take longer to implement than others.

By embracing and making strides towards these actions, departments can play a pivotal role in promoting cultural safety and advancing self-determination through the budget process. A summary of practical actions and examples for departments to consider across each of the domains can be found in '**Appendix 2 – Summary of actions for departments to consider across the budget cycle**'.

How DTF can help

DTF is available to help departments by answering questions, clarifying information, and providing assistance, where appropriate, with implementing the actions outlined under each of the domains.

Please contact DTF if you would like to discuss ways DTF may be able to assist departments with:

- facilitating cross-departmental collaboration, and with the social services and ACCO sectors
- providing advice on evaluations to help better inform an evidence base
- working with departments and ACCOs to develop outcome measures and avoided cost estimates during the business case development phase
- supporting linked data analysis
- providing advice on outcomes-based funding arrangements
- exploring resource and skill sharing between departments, the social services and ACCO sectors
- with departments support, continuing to volunteer economic expertise as part of development of individual budget bids.

In the 'Next steps' section, we also detail the enabling actions that DTF will undertake to support the implementation of the EIIF Cultural Safety Framework.

Domain 1: Working in partnership

Genuine partnerships with First Peoples are imperative to cultural safety and the ability to meaningfully engage in the design and implementation of EIIF programs. Genuine partnering with First Peoples is considered foundational in all actions outlined below, and should be seen as an integral part of each stage of the EIIF budget process. Equity in funding is crucial, as what may support meaningful participation in a larger mainstream organisation might not be sufficient to achieve the same outcome in a smaller ACCO.

We heard from consultations that good partnering was often hindered by ACCOs having to spend considerable time and resources reminding departments of their commitments to self-determination and the need for cultural safety, and/or being asked for cultural insights but being left without visibility on how the information has been used. We also heard that without capacity building or investment in evidence building enablers, many ACCOs can't meaningfully participate in budget submissions or are hindered by power imbalances and a lack of accountability in partnerships.

In aiming to uphold key principles of genuine partnering and help ACCOs to meaningfully participate in these partnerships, **departments are asked to consider** the following actions:

- Fostering engagement through facilitating and allowing sufficient time for capacity building
- Sharing information and encouraging transparency by providing clarity on how information is being used, managing expectations throughout the budget process, and ensuring feedback loops
- Being respectful of time commitments and ensuring requests of ACCOs are appropriate by attending cultural safety training and/or engaging with vast pre-existing resources
- Undertaking appropriate due-diligence on business cases where ACCOs are included as part of a consortia.

In general, DTF has found that the strongest EIIF proposals are those that are evidence based and have been developed with the social services sector or relevant entities.

These proposals often have more considered outcome measures, provide better data that is closer to the service delivery and service user experience, and are better able to pre-empt implementation risks. In addition, and importantly, working with the sector to develop proposals can help identify ways to reduce administrative burden on providers and test alternative delivery models that give providers more flexibility to deliver on desired outcomes.

As such, one of the things DTF considers in forming advice for Government is whether proposals have been co designed or developed in partnership with Aboriginal communities or organisations.

Although the Government is the ultimate decision-maker, the strength of the proposal's evidence and influence can be enhanced by DTF, departments, and the community working together.

"Trust doesn't come because you want it to be there, trust is about developing a relationship."

Quote from the consultation with ACCOs

Building and maintaining genuine partnerships is imperative to cultural safety and First Peoples ability to meaningfully inform the design and implementation of EIIF programs.

Aboriginal-specific programs should be designed and developed with, not for, Aboriginal people. As such, engagement with ACCOs should be considered the minimum standard when developing a business case that impacts First Peoples. Furthermore, DTF notes that engagement should begin early and continue throughout the development of the business case and the budget cycle.

Genuine partnering with ACCOs transcends mere documentation or organisational values; it embodies a genuine commitment to social justice, truth telling, mutual respect, and meaningful collaboration, and requires dedicated leadership at all levels. It is foundational in all the actions outlined below and is an integral part of each stage of the EIIF budget process.

The value of ACCOs

Research consistently backs up what Aboriginal communities have been saying, that ACCOs are more effective in achieving positive outcomes for Aboriginal communities compared to mainstream organisations. ACCOs excel in delivering holistic culturally centred care, and this approach is essential for addressing the complex, interrelated and generational barriers that are faced by Aboriginal communities.

Culturally informed service delivery is vital for Aboriginal communities as it leads to tangible improvements in health, social, and economic outcomes. Studies have demonstrated that when Indigenous people are involved in the planning and delivery of health services, there is increased community trust, higher service uptake, and better health indicators such as reduced rates of chronic diseases and improved mental health outcomes.[3] Furthermore, Culture acts as a protective factor, and extends to having broad social, physical, emotional, and economic benefits. For instance, culturally centred educational programs tailored to specific community contexts have led to higher student engagement and success rates.[4] These examples highlight that Aboriginal ways of knowing, being and doing are integral to meaningful improvements in the health and wellbeing of Aboriginal communities.

[3] Studies such as: Improving the health and well-being of Indigenous Australians through culturally appropriate health services, (2015); Improving Indigenous mental health through culturally competent health care services, (2018); 'Healing through culture': Aboriginal young people's experiences of social and emotional wellbeing impacts of cultural strengthening programs, (2024).

[4] The impact of culturally responsive educational programs on Indigenous student outcomes, (2019).

While each partnership or engagement may look different, genuine partnering tends to uphold the following key principles, including:

- Focus on collaborating rather than 'doing for', and instead aim to 'work with'
- Collaborate with ACCOs when developing programs that will support Aboriginal peoples
- Engage early with ACCOs when planning for the development of business cases, to ensure that the direction of business cases is self-determining and reflects community aspirations
- Fund ACCOs to grow and develop their evidence base
- Recognise and incorporate the value of learning from ACCOs – capacity building goes both ways
- Pay ACCOs for their knowledge and time given in consultations on cultural advice, respecting their community insights
- Trust Aboriginal advice and ensure it is given the same weight as non-Aboriginal advice
- Ensure ACCOs are part of the partnership governance structure and decision making
- As part of service agreements, provide direct funding to ACCOs that covers workforce, corporate and other associated costs in delivering the service, including evidence building.

In addition to the above, we heard from the sector that the following actions will help to enable ACCOs to fully participate in these partnerships throughout the EIIF budget cycle.

Fostering engagement

ACCOs should be supported to meaningfully engage with departments, recognising that some ACCOs may not have previously had exposure to government processes, and may require additional resources and/or opportunities to meaningfully participate.

By building in as much time as possible, departments can foster meaningful engagement with ACCOs, including providing time to answer questions, talk about process and plan engagements.

The window for engagement with the sector when developing a business case within the annual budget cycle is limited, but it is important to think beyond the annual cycle, to build proposals over time. DTF is available to support departments' planning and impact analysis for future budget proposals.

To help reduce barriers and promote the ACCO sector to engage on more equal footing, departments could consider how to support opportunities to build workforce and capacity building within ACCOs.

Some methods could be to support government staff placements within ACCOs, or having staff from ACCOs undertake placements within departments, to build capability and support mutual understanding as part of business case development. It is important to ensure that this is done in a way that is culturally safe and planned, for example, by ensuring that there is Aboriginal mentorship available as part of any placements.

A skillset that would benefit from two-way capacity building and knowledge sharing between government departments and ACCOs, is around data collection and evidence building.

DTF's Empowerment Fund is one practical example for how departments can facilitate capability uplift and foster engagement. The Empowerment Fund is a pilot grants program that seeks to address barriers the sector faces relating to data and evaluation capability, and enable greater sharing of useful evaluation findings and improved data collection and management processes.

Transparency and information sharing

"...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."

Quote from the consultation with ACCOs

A key theme of the consultations was the feeling that ACCOs were providing their valuable time, resources, and cultural knowledge in a one-way transaction.

While still adhering to the confidentiality requirements of some parts of budget, there are actions departments can take to bring Aboriginal community members and organisations along the budget journey. For example, departments can outline what information they can provide and when; provide updates on what is happening at each stage of the budget process; and be more transparent about how information provided by ACCOs is being used. Providing clear information on when an ACCO can expect to hear back from a department on budget outcomes or feedback can help to ease uncertainty during periods when Government is considering budget bids.

As good practice, and to build trust, departments should consider how best to test and share how input from ACCOs is being represented. For example, this could include sharing drafts or extracts of business cases where ACCOs have been involved in sharing their information and knowledge. Example extracts may include the description of the program design, desired outcome measures, and the consultation undertaken with ACCOs. This is a vital part of the feedback loop for ACCOs to be given visibility about how their information is being interpreted by departments and used to inform the department's proposal.

DTF recognises the constrained fiscal environment that departments are operating in and recognises that talking with providers ahead of decisions can raise expectations. This should not preclude departments working together with Aboriginal community members and organisations, but it does require greater expectations management and clear communication.

Communication is imperative to maintaining good relationships. While designing and developing a proposal in partnership with ACCOs can strengthen a proposal, it does not guarantee funding as Government remains the ultimate decision-maker. In these instances, time should still be taken to share and discuss the budget outcomes once they have been published to preserve transparency, accountability and trust, and help maintain an ongoing relationship with ACCOs in future budget processes.

Being respectful of the time commitment

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

Quote from the consultation with ACCOs

Aboriginal leaders and organisations are often sitting at many different tables.

Consideration needs to be given to what is the most efficient use of people's time. This can include providing papers in a timely manner before meetings, giving ACCOs sufficient capacity to prepare, streamlining processes where possible, and focusing meetings to reflect key decision points. It can also include reducing the information request burden on ACCOs by proactively seeking out information that is readily available or can be obtained by the department elsewhere.

Departments should consider how training or other resources can support staff to enhance their understanding of Aboriginal perspectives, needs and experiences, as well as existing departmental commitments and policies so that there is less burden and reliance on ACCOs to provide and reinforce this information.

There is a vast array of pre-existing resources that departments can draw on to reduce consultation fatigue of Aboriginal community members and ACCOs, and continue to demonstrate the Government's commitment to listening. This includes evidence coming out of the Yoorrook Justice Commission's lines of inquiry, the Royal Commission into Aboriginal Deaths in Custody and other coronial inquests into First Peoples deaths in custody, existing data collected by ACCOs, and ACCO policy positions.

Where ACCO participation is sought, they should be reimbursed or appropriately resourced for their participation in sharing or providing information to departments.

Consortia bids

In some cases, a department may work with an organisation, or a group of organisations on a business case or budget bid as a consortia including both ACCOs and mainstream organisations. In these situations, it is often the case that a 'lead' organisation may be the key contact for departmental engagement and advocacy.

During consultations, ACCOs expressed preference for direct engagement with departments. In consortia bids, departments are encouraged to engage with the ACCO/s involved to understand their involvement, even if they are not the 'lead' agency.

In considering these proposals and engagement with consortia, departments should undertake due diligence to understand how ACCOs are being engaged/involved, and the extent to which proposals adopt Aboriginal ways of knowing, being and doing. The responsibility for ensuring there is appropriate incorporation of First Peoples expertise and views for services delivered to First Peoples, rests with the department, who should take steps to assure itself of this. One example of this could be to request that an organisation who states their intention to partner with or is in a consortium with an ACCO, includes a reference or letter of support with contact details from the ACCO, e.g. CEO or senior executive.

Key questions to consider when assessing proposals from consortia include:

- To what extent has the partnering ACCO/s or Aboriginal community informed the design of the model, business case, and delivery of services and outcomes?
- What proportion of funding and resources will be going to ACCOs compared to other organisations in the consortium? Is that split of funding and resources resemblant to the proportion of expected Aboriginal services users?
- Has equity of funding been considered, i.e. need for additional resourcing, operational costs, governance and infrastructure particularly for smaller ACCOs?
- Does the business case show evidence of genuine partnering between mainstream organisations and ACCO/s in the consortium?
- Does departmental engagement with the consortia (e.g. through meetings, email correspondence) include representatives from the ACCO/s?
- Does the consortia ensure that in its governance structure, ACCOs are driving decisions about the initiative within their communities?

When assessing EIIF business cases, DTF will look for evidence that, or the extent to which, relevant proposals have been designed through genuine partnering with First Peoples. We may request additional information during budget deliberations to unpack what consultation process has been undertaken or is planned.

Domain 2: Recognising the Aboriginal evidence base

For a proposed initiative to be considered under the EIIF, departments are required to provide evidence of the initiatives anticipated impact through:

- Outcome measures: The quantified impacts on the lives of service users and their families, the broader community, and the service system
- Avoided costs: The monetised value that an early intervention initiative creates through reducing the future need for Victorian Government acute services.

We heard from the consultation that some ACCOs may be excluded from EIIF due to these high evidentiary requirements and a need to recognise and build the Aboriginal evidence base.

As such, to better align the EIIF with building the Aboriginal evidence base, **departments are asked to consider** the following actions to the two core evidentiary requirements of EIIF:

- EIIF outcome measures
  - Negotiating and co-designing meaningful EIIF outcome measures with First Peoples
  - Planning enough time for community-led consultation and co-design (information below on how EIIF can help to accommodate this)
  - Considering how cultural determinants of health and wellbeing can be incorporated and measured.
- Quantification of avoided costs and economic benefits
  - To supplement information on avoided costs, providing any additional information and evidence in the business case that speak to a holistic view of a programs benefits to the community
  - Early discussions with the EIIF team about options for evidencing program benefits that supplement EIIF's quantification requirements.

The EIIF seeks to grow investment in evidence based early intervention initiatives.

DTF has previously advised that there is varying quality of evidence and that Randomised Control Trials (RCTs) are one of the stronger types of analysis to inform EIIF initiatives.

Through this process, it's been made clear that some of these evidentiary requirements do not align or are not fit for purpose for Aboriginal-specific programs.

For example, consultations with ACCOs highlighted that evidence based overseas models (including RCTs) are not always fit for the Australian context and have not worked for Aboriginal communities.

Greater focus is needed on outcomes that are important and meaningful to Aboriginal peoples, and to recognise and build the body of knowledge and data derived from Indigenous experiences, perspectives, and research methodologies that inform culturally appropriate practices and policies.

This is not to say that the evidentiary standards for budget bids involving First Peoples should be lower. The rigour of EIIF provides government with confidence about investing in early intervention initiatives, and is a critical feature in the success of EIIF. Rather, departments, including DTF, need to work on how to better recognise the Aboriginal evidence base, and to think about how we can better incorporate this into the EIIF evidentiary requirements.

In this context, we have outlined below how both DTF and departments can begin to better align the EIIF with building the Aboriginal evidence base, including through EIIF outcome measures and quantification of benefits.

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

Quote from the consultation with ACCOs

EIIF Outcome Measures

Measuring outcomes, rather than inputs and outputs, are a core part of the EIIF.

They are designed and selected to measure the impact of an initiative, and to help provide government with a clear understanding of how an initiative is improving outcomes for individuals, the broader community and/or the service system.

All EIIF budget initiatives must include up to six outcome measures attributable to an initiative's impact, together with a baseline and annual targets, which departments report against annually.

A core part of doing this well is having outcome measures that are negotiated and co-designed with Aboriginal communities and ACCOs.

EIIF outcome measures should be meaningful for both the department and the organisation delivering them. They should align with what the department and ACCO both want to know, and with what success looks like for both parties. We want them to be able to show government that an initiative is working and achieving its intended goal, rather than simply measuring inputs and outputs. Co-design is essential to facilitating this.

Without co-design, there is a risk of creating outcome measures that:

- do not reflect the types of outcomes that the Aboriginal community is seeking to achieve, and therefore can limit progress and accountability on outcomes that truly matter to community
- can't be captured by ACCOs
- are culturally unsafe to ask or put Aboriginal community members at risk of re-traumatisation
- overlap with other measures/reporting requirements and add to the reporting burden
- aren't meaningful and therefore become a compliance activity.

The EIIF can accommodate flexibility in determining outcome measures to allow for greater community consultation during implementation, rather than business case development phase. This is to reflect that some outcome measures may need to be worked out through a community-led process post budget delivery, and the benefits that this process provides to ensuring that programs are effective and purposeful.

DTF considers that the cultural determinants of health and wellbeing can be incorporated into specific EIIF outcomes measures, including to capture improvements in connections to family or community, and Country and place.

Cultural determinants are crucial for understanding health, wellbeing, community resilience, and delivering meaningful outcomes. They support cultural connecting, strengthening, maintaining, and can reduce systemic inequalities. Understanding the cultural determinants of health and wellbeing is paramount when working with Aboriginal communities, because they are deeply intertwined with cultural practices.[5] The below case study references one example of an outcomes framework, developed by VACCA, that integrates cultural determinants of health and wellbeing into the measurement of outcomes.

Wellbeing

In Aboriginal communities, health and wellbeing is viewed holistically, incorporating cultural, spiritual, physical, and emotional dimensions. This perspective extends beyond a purely biomedical definition of health, emphasising wellness as strongly related to connection to culture.

[5] Resources such as Lowitja Institute's Culture is Key: Towards cultural determinants-driven health policy (2020), provide information on implementing cultural determinants of health in policy.

Case Study – VACCA's Culturally Therapeutic Ways (CTW) Outcomes Framework

VACCA has been on a journey to develop and implement their own CTW Outcomes Framework. It is integral to how VACCA are contributing to building an Aboriginal evidence base of practice. It was developed by staff and for staff, over several years. Throughout this process, the goal has been to build relationships with staff and listen to what they know works for the Aboriginal children, young people, families, and adults that VACCA work alongside. This has meant working from the ground up and capturing the collective experience to guide the work.

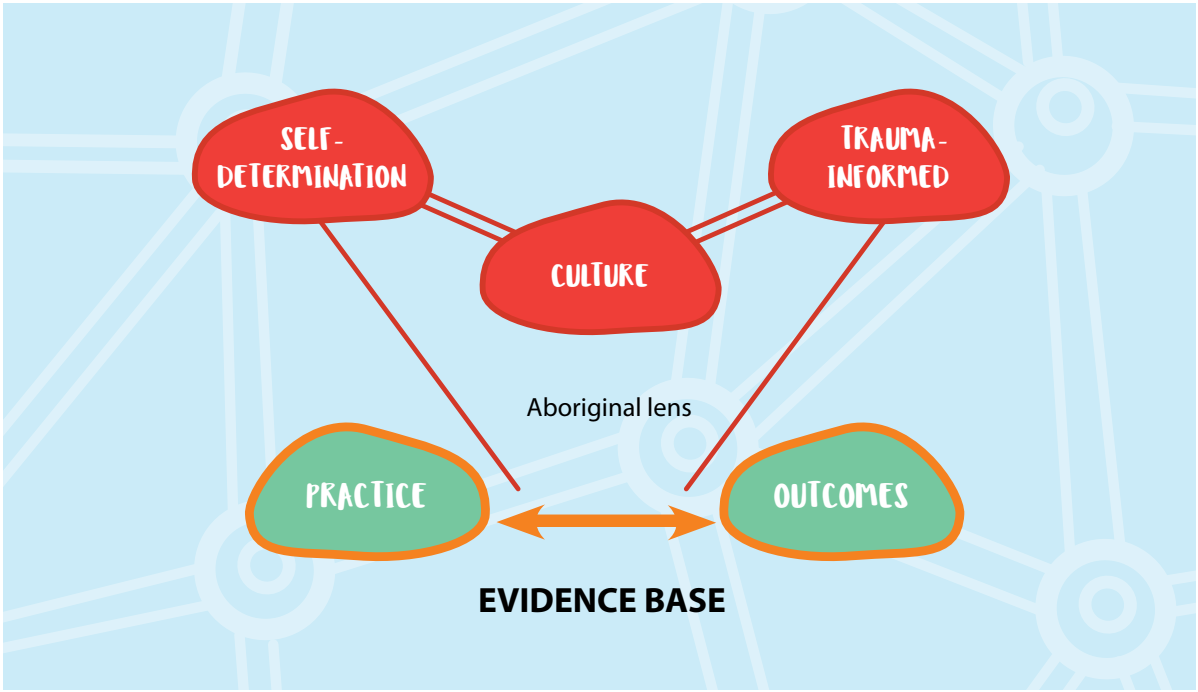
The CTW Outcomes Framework represents deep reflection on the meaning of the work that VACCA does and is based on the cultural determinants of health and wellbeing for Aboriginal peoples. It outlines outcomes that resonate with VACCA's history, culture and values, and shows what is important about their story as an ACCO.

The CTW Outcomes Framework has two parts:

- **CTW Organisation Outcomes:** The outcomes that leadership are responsible for, to prioritise Aboriginal Knowledge, Aboriginal Leadership, and ensure staff health and wellbeing.
- **CTW Community Outcomes:** The outcomes for the Aboriginal community VACCA services are working towards for children, young people, families, and adults to Heal, Connect and Protect.

The CTW Outcomes Framework is one of a suite of resources that sits within CTW – VACCA's guide to practice. CTW brings together culture with trauma informed and self-determination theories. These pillars of practice are integrated in VACCA's day-to-day work as they prioritise Aboriginal ways of working and formalising practice. In doing this, we are establishing an Aboriginal lens that links practice and outcomes.

Figure 1: An Aboriginal lens to practice and outcomes



Quantification of avoided costs and economic benefits

Quantifying benefits through avoided costs to the Victorian Government and economic benefits, are the other core components of EIIF which inform DTF's advice to the Government through budget deliberations.

Through this process, we heard that many ACCOs may not currently have access to the data, resources or skillsets to meet these evidence standards.

DTF also recognises the difficulty in quantifying the full range of benefits that exist in ACCO service delivery.

As such, we encourage departments to also provide any additional information that supports an EIIF business case, including program evaluations, case studies, or other research that informs a holistic view of the benefits to the community.

Narrative and stories should also not be overlooked as evidence to support business cases. As noted by the Productivity Commission, yarning is a qualitative research method that draws on First Peoples cultural practice of storytelling as a way of conveying information and for relationship building.[6] It involves in-depth discussions and offers a culturally safe place for First Peoples to freely talk about their experiences. In additional to it being a valid evidence source, the process of yarning also enforces the role of an evaluator to listen and learn in the data collection process and respects First Peoples as the authority of their knowledge. It involves reciprocal relationships and is a two-way process of learning and knowledge exchange.

The Culture and Kinship case study, provides an example of where Aboriginal ways of knowing, being and doing were incorporated extensively in the Culture and Kinship pilot, which informed a successful EIIF proposal through the *2024-25 Budget*.

Upon request, DTF can help departments to explore ways to quantify and/or better capture more holistic benefits, in addition to or including as part of avoided costs or economic benefits. DTF is also considering ways to improve how these broader benefits can be captured and incorporated, which is outlined in the 'Next Steps' section.

When assessing EIIF business cases, DTF will look for evidence of meaningful outcome measures that have been negotiated and co-designed with Aboriginal community members and ACCOs. Where a department has requested to work through outcome measures with ACCOs during implementation, DTF will look for a clear consultation plan that sets out how community will be engaged in co-designing outcome measures, recognising that this may require ACCOs to develop measurement tools to collect data and report on the achievement of outcomes. If funded, DTF may seek verification of this co-design during implementation, including based on feedback provided by both departments and service providers, particularly ACCOs.

[6] Productivity Commission, (2020). *A Guide to Evaluation under the Indigenous Evaluation Strategy*, p. 27.

Case Study – Culture and Kinship pilot program

In 2020, the Victorian Aboriginal Community Controlled Health Organisation (VACCHO) was commissioned by the Victorian Department of Health to develop an updated suite of health promotion resources focusing on primary prevention of Type 2 Diabetes. Following an initial round of consultations, VACCHO advised the Department of Health that there was low enthusiasm among ACCOs for the continued development of disease-specific, deficit-based interventions. VACCHO proposed repurposing the funds to explore how the health and wellbeing of Aboriginal and Torres Strait Islander people can be enhanced through focusing on the cultural determinants of health. The Department of Health agreed to a pilot, and a strength-based model was developed called 'Culture and Kinship'.

Four ACCOs were funded to develop self-determined, locally led initiatives that would increase connections with culture, country, kinship and community. Each ACCO identified community members who would benefit from participation in the pilot. Initiatives were developed through semi-structured yarning, through which each ACCO identified ways to increase connectedness within community, and to strengthen each participant's identity and sense of belonging within places and practices that have ancestral and cultural significance, meaning, and purpose. Initiatives included older Aboriginal women teaching young Aboriginal women to make possum skin cloaks, children and youth spending time on country, learning dances and making art, and Elders being engaged to steward a new community garden.

In each initiative, participants reported that they experienced improved mental health and were more likely to engage with preventive health activities facilitated by their ACCOs, including attending community gatherings, having regular health checks, and engaging proactively with cancer screening, antenatal care, and maternal and child healthcare. VACCHO partnered with an Aboriginal-led evaluation consultancy, Kowa Collaboration, to evaluate the pilot using *Impact Yarns*. This was a qualitative and participatory evaluation approach that produced a co-designed Theory of Change, through which participants could determine how their health and wellbeing had been influenced by the pilot. Insights from the evaluation report indicated that enhanced relationships, including between community members and their ACCOs, was a critical factor in chronic disease prevention across the life course. VACCHO also engaged Think Impact to evaluate and undertake a Social Return on Investment (SROI) analysis on the pilot. This was a mixed-methods evaluation approach that quantified an SROI of $8.29 for every $1 invested (assured by Social Value International).

The Culture and Kinship model is uniquely Community led, demonstrating that it is possible to synthesise Western and First Nations methodologies to produce an evaluation that meets the requirements of all stakeholders.

You can read more about the Culture and Kinship pilot and the evaluation findings/ methodology on the VACCHO website.

Domain 3: Supporting effective implementation

We heard from the consultations that First Peoples' ability to effectively address the needs of their community is often hindered by minimal planning time and funding for implementation.

Enabling activities that support service delivery as well as monitoring and evaluation also play a role in ensuring effective implementation and sustainability. The EIIF has ability to fund both service delivery and enablers, acknowledging that the latter can help support the former.

We also heard that the holistic nature of many of the service offerings of ACCOs does not align with the siloed structures of government, which also creates additional and overlapping reporting requirements.

In developing business cases for EIIF initiatives that are providing funding to ACCOs, **departments are asked to consider**:

- Planning for implementation
  - Seeking to provide ACCOs or other service providers with longer term funding agreements, if budget funding allows for it
  - Exploring other funding models such as flexible or pooled funding, or outcomes-based contracts as alternatives to standard service agreements
  - Ensuring resourcing requests for ACCOs recognise the scope of their work, including cultural load and consultation government seeks their engagement in.
- Monitoring and evaluation
  - Resourcing/funding for data collection and evaluation – consider requesting resources as part of budget bids to enable organisations to evaluate and/or collect data that is being asked of them
  - Prioritising Aboriginal-led data and evaluation – consider how to strengthen future evidence bases including by investing in Aboriginal-led approaches to data, monitoring and evaluation.

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

Quote from the consultation with ACCOs

The overarching ambition of EIIF is to enable a more balanced service system that moves towards early intervention and away from acute services. It seeks to do this by scaling up initiatives that have proven to be effective.

Departments are therefore asked to consider how best to minimise implementation risks and ensure that meaningful evidence can be collected to understand an initiative's effectiveness. This includes by addressing elements raised in the consultations with ACCOs, such as the length and nature of funding sought in a business case, and allowance for enabling activities that can help support implementation, such as monitoring and evaluation.

Departments are able to seek funding for enabling activities through the EIIF. For example, a number of enabling activities have been funded as part of EIIF packages in the past, including:

- evaluations
- linked data
- engagement reports with clients
- information technology systems improvements
- data governance improvements
- workforce enablers.

While it is ultimately the Government's decision on what is funded, departments should consider what funding they seek through the budget process to help with implementation and monitoring and evaluation of funded programs, as set out below.

Planning for implementation

When considering business cases, DTF assess the ability of an initiative to be delivered and any implementation risks, including implementation readiness, timelines, and required workforce.

Departments should consider how their business cases support suitable funding arrangements and service agreements during implementation.

Proposals that seek a minimum of three years of funding can provide more sufficient time to measure effectiveness and avoid year-on-year contracts, which can be challenging for workforce attraction and retention. Where business cases are funded for more than one financial year, departments should consider aligning service agreements to this period rather than providing annual service agreements that require providers to re-apply each year.

In addition, flexible or outcomes-based funding could also be considered as an alternative to standard service agreements. These types of arrangements can provide First Peoples with the flexibility to respond to the needs of their community and provide holistic care. For many in the sector, a move to outcomes reporting is a positive change, however we recognise that it does require additional capacity building within ACCOs and departments, and for reporting and systems to be updated to reflect these agreements.

We heard from the consultations that a workforce strategy is needed to meet the current sector needs and demand for services. ACCOs can face high turnover due to competitive employment options. There are also other factors for First Peoples staff who are more likely to have caring responsibilities and cultural and/or community obligations outside of the workplace than non-Aboriginal staff. This is known as 'cultural load'.

The Victorian Public Sector Commission notes that cultural load can include:

- caring for family members
- sitting on local advisory councils and boards
- being held accountable within the community for decisions made by your organisation
- racism
- intergenerational trauma
- lateral violence
- living and working off Country.

Departments are asked to consider how cultural load can impact the workforce required to deliver an initiative, both within the department as well as in service providers. As such, resourcing requests for ACCOs should recognise the scope of their work and additional supports needed for the First Peoples workforce to better support Aboriginal staff and enhance workforce retention.

Monitoring and evaluation

While the EIIF requires up to six outcome measures to be reported annually, we acknowledge that departments may request additional reporting requirements on service providers, particularly ACCOs, to track implementation.

ACCOs may feel the burden of reporting requirements, especially when they operate from many different funding agreements which each have their own reporting needs. Department should explore the degree to which they can automate data reporting from existing data sets and/or tailor data collection methods to reduce additional impost on providers.

When developing business cases, departments should consider:

- Resourcing/funding for data collection and evaluation: Request resources as part of budget bids to enable organisations to evaluate and/or collect data that is being asked of them
- Prioritising Aboriginal-led data and evaluation: Consider how to strengthen future evidence bases including by investing in Aboriginal-led approaches to data, monitoring and evaluation.

We've also heard from a range of stakeholders about the importance of data sovereignty in the collection of data relating to First Peoples. The definition of data sovereignty is continually evolving, DTF notes that departments have been working through data sovereignty considerations in their delivery and evaluation of programs, and that in practice, these can manifest in different ways.

Data Sovereignty and Indigenous Cultural and Intellectual Property (ICIP)

Aboriginal peoples have the right to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions (collectively ICIP), and any intellectual property (including copyright) incorporating their ICIP pursuant to Article 31 of UNDRIP.

In accordance with ICIP rights as identified in UNDRIP, Aboriginal peoples have the right to:

- manage and control their ICIP
- ensure that any means of protecting ICIP is based on the principle of self-determination
- be recognised as the primary guardians and interpreters of their cultures
- require free, prior and informed consent for the collection, access and use of ICIP
- authorise or refuse to authorise the commercial use of ICIP according to Aboriginal customary laws
- maintain the secrecy of Aboriginal knowledge and cultural practices
- guard the cultural integrity of their ICIP
- be given full and proper attribution for sharing their cultural heritage
- preserve, protect and manage Aboriginal cultural objects
- respectfully care for, and manage, Aboriginal ancestral remains
- control the recording of cultural customs and expressions and the particular language which may be intrinsic to cultural identity, knowledge, skill and teaching of culture.

Upholding and implementing these ICIP rights can ensure best-practice engagement, recognition and protection of the ICIP rights of Aboriginal peoples when developing and delivering EIIF initiatives.

Departments can support this by acknowledging and considering ways in which they can protect and ensure ownership of ICIP remains with First Peoples. This aligns closely with data sovereignty ensuring that ACCOs have control and ownership of their data. Examples could include ensuring the protection and ownership of Intellectual Property (IP) to ACCOs who provided cultural knowledge or joint IP of material, such as evaluations, produced in collaboration with an ACCO.

DTF acknowledges that more could be done to understand how data sovereignty can be better embedded and implemented in EIIF initiatives, and that it is an area that would benefit from further work and exploration.

When assessing EIIF business cases, DTF will look for proposals that identify what the needs from service providers, particularly ACCOs, are in terms of collecting data during implementation and proposing adequate resourcing to do this, as well as any commitments to building Aboriginal-led data and evaluation.

Next Steps

The development of the EIIF Cultural Safety Framework has been a learning process, but its establishment is just the beginning of the journey.

We are committed to continuing to listen to and work with departmental stakeholders, Aboriginal community members and ACCOs to continuously improve the EIIF Cultural Safety Framework to achieve positive outcomes and embed the intentions of this work.

People are at the core of successfully delivering and implementing this work. Recognising this, the EIIF Cultural Safety Framework seeks to encourage capability uplift while acknowledging that across government, different initiatives are at different stages of the continuum towards Aboriginal self-determination, as per the VAAF.

VAAF continuum towards Aboriginal self-determination

The continuum recognises that transforming government is a process of continual improvement which requires active building of capability, and that different policies, initiatives and strategies across government are at different stages of advancing self-determination.

DTF actions to improve the EIIF

The insights we heard from ACCOs and departments highlighted other activities that DTF could undertake to better support cultural safety in the EIIF and more broadly.

DTF is committed to supporting implementation of the EIIF Cultural Safety Framework by developing additional resources and undertaking other enabling actions, which may include:

- Showcasing examples of 'how to' and good practice that are occurring across portfolios, and sharing these learnings publicly.
- Updating the EIIF assessment criteria for Outcome Measures to include evidence of co-design and genuine partnerships.
- Improving understanding and awareness of EIIF across First Peoples' organisations and forums, in partnership with departments.
- Developing a menu/matrix of EIIF outcome measures, in partnership with First Peoples.
- Building the evidence base to inform future EIIF bids, for example through a Client Pathways report or quantification and/or formal attribution of economic value to cultural knowledge in government contracts to ACCOs.
- Exploring ways to improve transparency and information sharing, as well as verification of expected outcomes, through the EIIF Annual Outcomes Report.

Application of broader learnings

The consultations with ACCOs and departments that informed the EIIF Cultural Safety Framework raised insights which go beyond the remit of EIIF, and therefore the domains and actions within the EIIF Cultural Safety Framework. While DTF notes that the EIIF Cultural Safety Framework seeks to respond to the barriers identified from the ACCO consultations, the ability for each barrier to be addressed through EIIF varies. For example, we note that 'Lack of Aboriginal-led decision-making within budget processes' was identified as a key barrier which requires broader system change from government, and that levers within EIIF may be limited.

However, the re-established DTF Self-Determination and Treaty Taskforce is undertaking a number of priority and longer-term projects where it will consider the findings and insights from the consultations that have application beyond EIIF, and explore how they can help inform work around advancing self-determination:

- in budget processes and decision making
- by improving cultural safety and Aboriginal employment and inclusion in DTF
- through greater partnerships and engagement with First Peoples
- by improving economic outcomes for First Peoples.

The EIIF Cultural Safety Framework does not limit or anticipate the impact and role that future Treaty or Treaties may have on the Victorian Government's efforts to enable self-determination.

It is important that key policy reform initiatives continue alongside Treaty preparations. DTF is committed to progressing the significant and important work of ensuring cultural safety in our systems and processes, and enabling self-determination in partnership with First Peoples.

How will we be measuring success?

To measure the progress of the EIIF Cultural Safety Framework, DTF will monitor activities, including through review of EIIF business cases submitted by departments. DTF will prepare and trial annual high-level public reporting that demonstrates improvement (or otherwise) across the below indicative indicators over time.

Domain	Indicative indicator	Example of how an indicator could be met
Working in partnerships	Number or proportion of relevant EIIF business cases developed in partnership with ACCOs or community	An EIIF business case proposes a service delivery model endorsed by community
	Number of stakeholder engagements between DTF and ACCOs or community to discuss EIIF	An event hosted by DTF to bring together departments and ACCOs to raise awareness of and discuss EIIF
	Number or proportion of relevant EIIF business cases that propose funding to ACCOs for First Peoples service delivery	An EIIF business case proposes direct funding to ACCOs for First Peoples service delivery
Recognising the Aboriginal evidence base	Number or proportion of relevant EIIF business cases that include outcome measures developed with ACCOs or community	An EIIF business case proposes outcome measures that have been developed with ACCOs previously engaged with the initiative
	Number or proportion of EIIF business cases that include additional information and evidence that speaks to broader benefits to community	An EIIF business case that includes evidence collected through Aboriginal ways of knowing, such as yarning (storytelling)
	Number or proportion of EIIF outcome measures that incorporate the cultural determinants of health and wellbeing	An EIIF business case that proposes cultural connection as an outcome measure
Supporting effective implementation	Number or proportion of EIIF business cases that propose funding to ACCOs that is, at a minimum, proportionate to the number of expected clients	An EIIF business case that proposes funding to ACCOs that is more than proportionate to the number of expected clients
	Number or proportion of EIIF business cases that seek additional funding for ACCOs for their contribution to monitoring and evaluation	An EIIF business case that seeks funding for ACCOs to support reporting and evaluation processes
	Number or proportion of EIIF business cases that seek other enabler funding for ACCOs	An EIIF business case that seeks funding to support data and information systems in ACCOs

Although not a specific EIIF Cultural Safety Framework domain, DTF will also monitor progress related to capacity and capability uplift, which is a pre-requisite to successful implementation. This includes information relating to:

- how departments are engaging with the EIIF Cultural Safety Framework
- the extent to which departments have changed practices as a result of the EIIF Cultural Safety Framework
- the key opportunities and challenges for departments in implementing changes
- the extent to which it has changed ACCOs' experience with and/or awareness of EIIF
- feedback on how DTF could improve implementation of the EIIF Cultural Safety Framework.

DTF will consider how to update its reporting against the above indicators based on feedback provided by both departments and service providers, particularly ACCOs.

Contact us

We're keen to understand how we, as DTF, can work with departments, ACCOs and First Peoples to develop and support the EIIF Cultural Safety Framework. If you're interested in being involved or are seeking more information, please contact earlyintervention@dtf.vic.gov.au.

Appendix 1 – What we heard

Methodology

VACCA led consultations with ACCOs across each of the EIIF portfolios to inform the EIIF 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 EIIF 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 EIIF 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.

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.

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."

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 polices 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.

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.

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."

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.

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 EIIF. 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.

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 polices 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."

As raised by ACCOs, lack of investment in evidence building *in practice* this means:			
Prioritisation of Western definitions of evidence standards impedes access to funding and exacerbates resource disparities and lack of Aboriginal evidence.	**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.	**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.	**Hinders the development of an Aboriginal-specific evidence base** due to a lack of support and funding for evaluating existing programs and practice.

***Solutions* raised:**		
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.	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.	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.

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 EIIF, 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 [EIIF] 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:		
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.	**Skill requirements for cost analysis:** EIIF bids can automatically exclude ACCOs given their inability to comply with stringent documentation and evidence requirements.	**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.

***Solutions* raised:**		
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.	Revise processes to enable Aboriginal led identification of outcomes and measures that include cultural determinants of health and wellbeing.	Provide information to ACCOs on development of financial costings and simplify these requirements.

"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:			
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.	**Perpetuation of systemic racism** and inadequate culturally appropriate service delivery.	**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.	**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.

***Solutions* raised:**		
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.	Encourage two-way capacity building between departments and ACCOs.	Development of comprehensive guidance and principles for collaboration, outlining expectations and responsibilities for both mainstream organisations and ACCOs in service delivery.

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 EIIF 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.

Appendix 2 – Summary of actions for departments to consider across the budget cycle

The below table provides a summary of actions for departments to consider that support the implementation of the EIIF Cultural Safety Framework.

While this is not an exhaustive list, it seeks to provide practical actions and examples that could be undertaken by departments at different phases of the budget cycle.

PHASE OF BUDGET CYCLE

Early engagement	Proposal development	Budget deliberations	Post-budget outcomes and implementation
Domain 1: Working in partnership			
Fostering engagement			
• Build in as much time as possible to start engaging with ACCOs • Provide time to answer questions, talk about process, and plan engagement • Consider opportunities for secondments or staff placements between ACCOs and departments in a culturally safe and planned way, e.g. Aboriginal mentorship for involved staff	• Organise workshops or meetings to facilitate two way capacity building • Have staff with relevant skillsets available to help with different queries • Provide seed funding to help ACCOs develop specific skills in house • Safe sharing of relevant aggregated VPS data that can inform ACCOs work and program designs	• Upon request, provide DTF with further information on how First Peoples were engaged as part of business case development	• Consider support for capacity building and data collection and/or evidence building • Consider what data and evaluations can be shared back with the sector
Transparency and information sharing			
• Consider where/how ACCOs can be brought along the budget journey to build understanding of government processes • Clearly communicate the purpose of engagement and how consultation is expected to be used • Manage expectations around involvement in engagement not representing any guarantee of a future Government funding decision	• Be clear on what information will be used and how • Consider what drafts or extracts from business cases can be shared	• Communicate timelines and what to expect at each stage of the budget process • Where appropriate and valuable, continue regular catchups to maintain relationships • Prioritise ACCOs for funding related to outcomes for Aboriginal people	• Debrief post budget announcement to ensure feedback loops • Organise a reflection session on the process and/or partnership • Consider how to prioritise ACCOs for delivering Aboriginal programs in request for tender processes

Time commitment

• Familiarise with existing departmental and government commitments, policies, and framework • Familiarise with agreements, needs and outcomes from groups or partnership forums between department, ACCOs and community members • Organise training for department staff to enhance understanding of Aboriginal perspectives and experiences, e.g. cultural safety training	• Plan and discuss where ACCOs can have the most input and where department should be taking the lead • Provide agenda/papers ahead of meetings • Draw on vast existing evidence base, e.g. Yoorrook Justice Commission lines of inquiry • Reimburse and/or appropriately resource ACCOs for their participation		

Consortia bids

	• Undertake due diligence and activities to assess the extent of ACCO/s engagement or involvement • Request a referee and contact details from the ACCO/s named in the consortium		• Debrief post budget announcement to manage expectations and highlight any differences between the funded and consortia bids • Engage directly with ACCOs in the consortia to ensure involvement and to keep the consortia accountable

Domain 2: Recognising the Aboriginal evidence base

Outcome measures

• Plan enough time for community-led consultations and co-design	• Negotiate and co-design outcome measures that are meaningful to both departments and ACCOs • Where more time is needed to co-design during implementation, develop consultation plan • Consider how cultural determinants of health and wellbeing can be incorporated into outcome measures	• Upon request, provide DTF with further information on how First Peoples were engaged in developing outcome measures	• Follow consultation plan, if outcome measures were agreed to be worked through during implementation

Quantification of benefits

• Discuss with the EIIF team about options for evidencing a programs benefits that supplement EIIF quantification requirements	• Provide any additional information in the business case that speak to a holistic view of a program's benefits • Look for other examples of evidence to supplement avoided costs quantification, e.g. yarning		

Domain 3: Supporting effective implementation

Planning for implementation

• Explore options for implementing flexible/ pooled funding models or outcomes-based contracts	• Plan for longer term funding arrangements and ensure resourcing requests account for this • Consider scope of work and needs of ACCOs and First Peoples staff and ensure resourcing request accounts for this, e.g. funding for cultural load		• Consider longer term service agreements where budget funding has been provided for multiple years • Where flexible funding/ pooled or outcomes-based contract is funded, ensure reporting and systems are updated accordingly

Monitoring and evaluation

• Understand ACCOs' current reporting obligations and where different lines of funding are coming from	• Request resources as part of budget bids to enable evaluation and/ or data collection		• Looking for opportunities to streamline or reduce reporting burden • Explore opportunities to automate data reporting from existing data sets and/or tailor data collection methods to reduce additional impost • Invest in Aboriginal-led approaches to data, monitoring and evaluation, with consideration to data sovereignty

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