

Submission to the Issues Paper

Statutory Review of the DAT Act

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Summary

[Seer Data & Analytics \(Seer Data\)](#) together with the [Greater Shepparton Lighthouse Project](#) and Maranguka is pleased to provide a submission to the Department of Finance Issues Paper for the Statutory Review of the DAT Act.

We acknowledge the DAT Act was introduced as a response to the recommendations of the Productivity Commission's Inquiry Report into Data Availability and Use (2017). The Inquiry into Data Availability and Use identified many potential benefits flowing from greater data availability and use, including supporting economic and research opportunities, and enabling streamlined and efficient service delivery. The report estimated the value of Australian public sector data could be between \$625 million per year up to \$64 billion per year. One goal of the DAT Act was to help realise that value.

We are well placed to contribute to the Issues Paper and Review because each organisation has participated, either jointly or independently, to enable the safe, effective and beneficial sharing of government data to local communities. This sharing of government data to local communities is utilised to improve service delivery and outcomes for the people in Australian communities in which we live and serve.

These data sharing initiatives occur primarily outside of the DAT Act and Scheme and involves sharing between federal and state custodians with not-for-profits and community organisations. Where Commonwealth data has been requested by Seer Data to share with not-for-profits and local communities, we have requested data through Data Place.

Our submission outlines the opportunities and challenges of sharing data between governments and not-for-profits primarily focused on improving local outcomes in communities. We are advocating for not-for-profits, First Nations led and owned organisations and intermediaries such as Seer Data to be included in the DAT Act and Scheme.



About the Partners

The **Seer Data** Platform is a data access, data sharing, and storytelling platform for people of all skillsets. Because of our reach at the local level, we work with hundreds of grassroots organisations and thousands of people around Australia.

These organisations are undertaking important work to address social inequalities and localised issues and have varying levels of sophistication and internal data capabilities. Seer Data provides these organisations with a secure (ISO 27001 Certified) data platform to store, access and safely share data insights in support of their initiatives. Our technology also allows for customised data sovereignty frameworks to be enabled, as evidenced by our long relationship with Maranguka and Wonnarua National Aboriginal Corporation.

In the last 12 months, Seer Data has helped 1,000 not-for-profits, community organisations, Government agencies, philanthropic grantmakers and businesses create 11,000 Insights and shared 280,000 data stories. We have empowered 35 communities with data sharing capabilities to make data-informed decisions to take actions for better outcomes.

The **Greater Shepparton Lighthouse Project (GSLP)** was established in 2014 as a place-based collective impact initiative that works to improve the outcomes of young people in the Greater Shepparton community from conception to career. GSLP works to ensure all children, young people and families in Greater Shepparton reach their full potential and thrive. GSLP taps into and aligns latent resources within the community and beyond to build capability and prevent issues such as social isolation, systemic disadvantage and poor educational engagement.

Maranguka is an Aboriginal-led community organisation working to improve outcomes and creating better coordinated support for vulnerable families and children through the true empowerment of the local Aboriginal community in Bourke. Maranguka's 12-year journey toward community-owned and led data collaboration is fuelling the systems-change vision for Bourke. Central to the work is data ownership, custodianship, access, sharing and community storytelling, guided by the principles of Aboriginal Data Sovereignty & Governance (ADS&G) and the leadership of Maranguka and the Bourke Tribal Council. In August 2024, Maranguka signed a landmark data sharing agreement with NSW Health aligned to PR4 for data access and sharing of government held data into perpetuity.

DAT Act Review and Reform

Seer Data, GSLP and Maranguka are calling for greater access and sharing of Government held data assets for public benefit to drive social outcomes, efficiencies in public sector spending, greater transparency in Government activity, and to unlock innovation and service delivery improvements at the community level.

We acknowledge the Australian Government's goals through the Australian Data Strategy and the Data Availability & Transparency Act and associated DAT Scheme are to improve the delivery of services for Australians and drive greater efficiencies through data access and sharing, and to address the trust deficit by the citizenry related to data use and reuse.

However, we see limitations in the current legislation that we believe prevent the realisation of the opportunity for public interest data sharing and collaboration envisioned by the Act. These exclusions to data use weaken the value of it as a public benefit asset.

Most importantly, the not-for-profit, Aboriginal Community Controlled Organisations (ACCOs) and private sector has been wholly precluded from participating in the data sharing scheme described in the Data Availability & Transparency Act (the Act), which is a missed opportunity based on our collective experience.

Whilst universities are included within the current legislation, not all communities, not-for-profits or ACCOs are in the position or have the desire to partner with a university. A common barrier to collaborating with universities includes the time and cost associated for the organisations, who are often already undertaking their work with stretched resources. Another important consideration for whether partnering with a university is appropriate relates to Aboriginal Data Governance & Sovereignty and Intellectual Property rights.

The DAT Act (and Scheme) should include the not-for-profit sector in decisions related to Government data access and sharing because the sector itself delivers an estimated \$80B+ in federal and state grants each year to improve outcomes in communities.

Through our work in local communities, we can collectively see Australia is on the cusp of a data revolution and we seek greater availability of access to Commonwealth data to support this shift.

Additionally, we acknowledge that state and territory data custodians are not included in the DAT Act, and we would welcome widening of the DAT Act to include the states and territories to streamline access to relevant data assets for all local communities irrespective of whether this data is generated and held by Commonwealth or state governments.

We seek for reform that includes not-for-profits and private sector data intermediaries, such as Seer Data, in sharing and access at a federal level and to effectively “loosen the data reins” to enable communities to take greater control of their local challenges.

Notwithstanding our conviction that private sector participation in the data sharing scheme is crucial to realising the benefits and productivity gains of community data sharing; we also recognise the need for appropriate standards and protocols to regulate the data sharing for Custodians to satisfy their obligations for protection of the data and of individuals represented in that data. We realise that robust standards and protocols are best developed on the basis of experience which takes time to accumulate.

Additionally, there are data assets that are held by other Government authorities for which an authorising sharing environment would provide improved access and unlock innovation.

Through a freer flow of this data and data collaboration with communities, including not-for-profits, First Nations organisations, and private sector data services intermediaries such as Seer Data, we will enable community-led solutions to thrive, and collaboration to lead to increased productivity, innovation and social outcomes for public benefit.

The amendment of the DAT Act would be a commitment to data sharing and collaboration from all federal and state governments to local communities and not-for-profits to enhance community-led decision making recognising the data sovereignty of citizens and the importance of the community data sovereignty movement to democracy.

Inclusion in the Act for not-for-profits and companies such as Seer Data to act as intermediaries to access the federal data assets available for communities is central to the data sovereignty movement.

We are calling for changes to make the entire DAT Act work for *all* Australians, in particular First Nations organisations and local communities represented by not-for-profits.

We believe policy makers, data stewards and data analytics teams need to be better informed about First Nations Data Sovereignty and the importance of sharing data with communities. We encourage stronger collaboration with First Nations and communities (including place-based initiatives and collective impact backbone teams and collaborations) to better understand the importance of data for shared learning to lead to systems change and ultimately better outcomes.

Case Study: Maranguka & Palimaa Data Platform

Earning Trust – a deeper understanding of First Nations Data Sovereignty and Community Data Governance

Maranguka is one of the lighthouse initiatives for data-driven, community-led decision making in Australia and has resulted in reduced crime, particularly among young people, increased safety, millions of dollars in justice savings, and new economic investment for Bourke.

Work being done on the ground is unified by Bourke's 'Growing our Kids Up Safe, Smart and Strong Strategy.' Central to this work is data access, sharing and storytelling guided by the principles of Indigenous Data Sovereignty and the leadership of Maranguka and the Bourke Tribal Council.

Seer Data & Analytics is working in partnership with Maranguka to support the initiative by automating data access and data sharing from 16 data custodians for data sharing.

Restricted data is shared from include NSW Health, NSW Education, NSW Communities & Justice, Department of Social Services as well as services and not-for-profits operating in Bourke. The data sharing agreements were time consuming to negotiate and completed directly with each custodian.

The result is the Palimaa Data Platform, a data infrastructure platform for access, analysis, collaboration, sharing and secure storage of data contributed to Maranguka in one place. 'Palimaa' meaning horizon 'Where the Sky Meets the Land', is allowing Bourke people to drive forward their community transformation vision of better outcomes & results for children, young people and families.

Maranguka's Palimaa Data Platform empowers the community of Bourke to respond rapidly to changing circumstances evidenced by data. Data is reviewed regularly in collaborative working group meetings attended by cross-service community leaders and stakeholders.

Actions taken as a result of the data collaboration include refinement of existing service delivery and programs, ideation and mobilisation of new initiatives, community member and stakeholder engagement and relationship building, and the development of new, sustainable funding models.

The format of regular community data collaboration also ensures that the narrative is controlled by the community and local knowledge is at the heart of the decision-making process.

Creating and maintaining an environment of trust and inclusion that supports the systems-change vision is at the heart of Maranguka's Palimaa Data Platform. Access to and sovereignty over community data underpins the powerful community collaborations and actions coming out of Maranguka's working groups and partnerships.

In harnessing the power of data, Maranguka has created a landmark example of community leadership and collaboration as they work towards their mission of ensuring no one gets left behind in Bourke.

Given that few First Nations led initiatives have the time and resources to establish the data sharing agreements required for self-determination and shared decision making with Governments, we see an opportunity to embed the principles and access to Government held data for First Nations people in a revised DAT Act.

Case Study: Greater Shepparton Lighthouse Project

Challenges and Opportunities of Local Data Access and Sharing for Collaborative Community-Led Decisions

The challenges and opportunities of working with and accessing data in place-based work in Shepparton has been experienced by the GSLP. In the last 18 months, GSLP and its collaborating partners developed the 2025 State of Shepparton's Children Report as a digital, live report.

A central concern for the development of the digital report was the lack of accessible, localised data. VCAMS published data in December, but it is not available by local government areas. It's regional and therefore required data was not published specifically for Greater Shepparton. This lack of granularity limits the effectiveness of local planning, eliminates place-based interpretation and makes it difficult for communities to track changes over time. This has meant GSLP together with Seer Data had to do many individual data requests from custodians that took many months to resolve.

Furthermore, even where data exists, its structure often undermines its utility. Participants noted how comparisons were across vastly different localities. "We're comparing places that are not the same – this isn't apples to apples," said one speaker, highlighting how such generalisations can lead to misguided decisions. These issues are compounded by inconsistencies in how data is gathered, with the latest rounds being "not comparable with the first round," thus impeding longitudinal analysis.

The importance of supporting First Nations data sovereignty and community-led decision making has been an important consideration in GSLP's data work. A serious and more

complex challenge discussed was the persistent exclusion of Aboriginal and Torres Strait Islander communities in data narratives and decision-making processes. This dynamic reinforces mistrust and leaves many communities feeling unheard, especially when systemic racism results in data that does not reflect lived realities.

Bureaucratic processes for access to relevant data and funding mechanisms are obstacles. Communities often face delays due to administrative bottlenecks, and the competitive nature of funding can pit regions against each other. This structure undermines collective action and contributes to fatigue among local advocates.

One of the most critical developments is the push for community-led data that can support collaboration and improved service delivery.

“We want to own our data. That’s the only way to tell the real story.” By giving communities control over how data is collected, interpreted, and shared, it becomes a tool for empowerment. There is also a growing appetite for cross-sector collaboration. “We’re stronger together – if we can align our work, we can have a bigger impact.”

Data storytelling is a powerful tool for improving outcomes. GSLP experience the significant response people in the community have to stories. By using community voice and local data to tell the truth of what’s happening, GSLP can place people at the centre of fundamental systems change, moving hearts and changing minds. Combined with an emerging political openness to equity and justice, these opportunities present a way forward, towards more inclusive and effective systems.

Case Study: Stronger Places Stronger People (SPSP)

Data Activation of Government Initiatives

In 2019, the National Leadership Group for the Stronger Places, Stronger People initiative (SPSP) was formed and \$35 million committed for the first phase. This phase covered a 5 year period up until June 2024 when a further \$64 million over 6 years, was committed. The commitment included the development of the Understanding Measuring Evaluating and Learning framework (UMEL), co-designed with community. Seer Data were contracted to data activate the UMEL and provide the data infrastructure to help communities make data-informed decisions.

To operationalise the UMEL, Seer Data mapped the best-fit data to each indicator, identifying key datasets that aligned with the project’s goals. Where Open data was insufficient, Seer Data proactively sourced restricted data to fill gaps. This involved negotiating with data

custodians, relying on already established trust with those stakeholders, as well as building new trusted relationships.

To facilitate Commonwealth data requests, Seer Data registered to use Dataplace. As mentioned above, as a private entity, Seer Data & Analytics is excluded from accessing data under the current DAT Act. This resulted in a challenging and time-consuming process. The Dataplace platform is designed to support requests that fall under the Commonwealth DATA scheme. As the requests submitted by Seer Data did not fall within this legislation, all custodians requested that Seer Data finalise requests through individual processes outside of Dataplace. A number of these processes required negotiating the payment of invoices, as part of the custodian's data request cost-recovery policies. These costs present a barrier to communities wanting to maintain the data accuracy and recency of their indicator frameworks.

Seer Data is supportive of the Dataplace platform and believes it has the potential to streamline the data request process. Unfortunately, the benefits of the platform are currently limited to accredited users and data service providers. This excludes communities who are leading initiatives designed for public good, and the organisations that are supporting them.

The SPSP Data Sharing Platform is an integrated data access, governance, and capacity building resource developed by Seer Data to empower communities to address complex challenges. As a non-accredited user, the best-fit data available for Seer Data to acquire on behalf of the SPSP initiative was aggregated, suppressed and often not available on a regular cadence. While this provides a baseline for communities who are in the early stages of their journey, more mature communities would benefit from a broader catalogue of data that enables deeper analysis.

The SPSP project has highlighted several realised and potential benefits of sharing data with communities:

- Supporting community members to start discussions on the same page, based on the evidence available, as opposed to long-held assumptions and bias.
- Data-informed decision making because of access to data at the local level
- The ability to access data on-going would enable communities to evaluate and learn from their initiatives to ensure that they can adjust as required.
- Opportunities to diversify funding sources through the development of evidence-based grant applications.

The learnings gained during this project highlight how data is central to community-led decision making. However, to truly realise systems change, more equitable and sustainable access to high-quality, granular data is essential.